# **Appendix 1**

Adopted SHLAA Methodology (2010)

# Strategic Housing Land Availability Assessment (SHLAA)

Methodology

August 2010



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# **1.0 Introduction**

This document sets out the proposed methodology for producing a Strategic Housing Land Availability Assessment (SHLAA). The Assessment will provide critical evidence for the Core Strategy.

The SHLAA is a comprehensive assessment of all potential housing sites in the whole of the Borough. Its aim is to identify as many sites with housing potential in and around as many settlements as possible in the study area.

This assessment is not a Site Allocations Development Planning Document, nor does it determine which sites will be allocated or supported by the Council in developing its Local Development Framework (LDF). Potential housing sites obtained through this assessment process will be used to identify a deliverable supply over the Plan period.

Furthermore, the identification of a site in this study as having potential for housing will not prejudice the determination of any subsequent planning application for that site. Such applications will continue to be determined in accordance with relevant policies of the Council's Borough Local Plan.

# 2.0 Policy Context

Planning Policy Statement 3: Housing (PPS3<sup>1</sup>) directs Local Planning Authorities (LPAs) to assess and demonstrate adequate housing supply in accordance with Regional Spatial Strategies. However, as they have now been revoked<sup>2</sup> the Council is not guided by its Regional Strategy, the South East Plan (2009).

The South East Plan required the delivery of 10,000 houses in the period 2006-2026 – an average of 500 houses per annum over the plan period. The Plan divided the housing requirement to be delivered in two sub-regional areas: the London Fringe and the Gatwick.

The Council will now determine the right level of local housing provision in the Borough, and identify a long-term supply of housing land. The SHLAA will be a key component in identifying the amount of land availability and help to inform a housing target.

<sup>&</sup>lt;sup>1</sup> Planning Policy Statement 3: Housing (Communities and Local Government, 2006)

<sup>&</sup>lt;sup>2</sup> Communities and Local Government Chief Planning Officer Letter: Revocation of Regional Strategies, 6 July 2010

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PPS3 directs a more responsive approach to planning and requires LPAs to:

- Identify specific, deliverable sites for the first five years of a plan that are ready for development.
- Identify specific, developable sites for years 6-10 and ideally years 11-15.
- Indicate broad locations for future growth, where sites for years 11-15 cannot be identified.
- Not include an allowance for windfalls<sup>3</sup> in the first 10 years of the plan.

PPS3 requires that Local Development Document (e.g. Core Strategy) policies should be informed by a robust, shared evidence base through a SHLAA. The Communities and Local Government SHLAA Practice Guidance<sup>4</sup> (hereby referred to as the 'Practice Guidance') states that the purpose of a SHLAA is to:

- Identify sites with potential for housing.
- Assess their housing potential.
- Assess when they are likely to be developed.

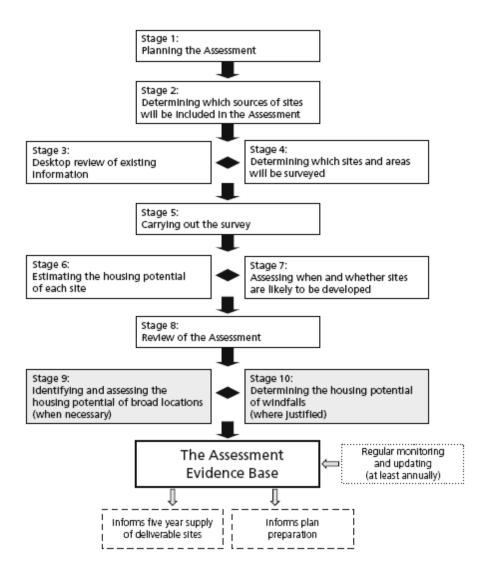
The Practice Guidance is used to guide the development of the SHLAA in a staged process and the following methodology reflects this process.

<sup>&</sup>lt;sup>3</sup> Windfall sites are those which have not been specifically identified as available in the local plan process. They comprise previously-developed sites that have unexpectedly become available.

<sup>&</sup>lt;sup>4</sup> Strategic Housing Land Availability Assessments: Practice Guidance (Communities and Local Government, 2007)

# 3.0 Proposed Methodology

#### Figure 1 - SHLAA Process and Outputs (Practice Guidance - CLG, 2007)



### 3.1 Stage 1: Planning the Assessment

This methodology is an overview of how the 2010 SHLAA will be undertaken. It has been produced to allow stakeholders and partners to gain an understanding of the process, to allow for comments on the proposed methodology, and, as a 'call for sites' to allow for sites to be submitted for inclusion in the SHLAA Assessment (the Site Identification Form is attached to this document at Appendix A).

The Practice Guidance recommends that stakeholders to be involved in the SHLAA should be identified from the outset. The consultation process will help to identify sites and ensure the deliverability and developability of sites; it will also help to provide the Council with the best possible position to deliver its housing requirements.

#### 3.1.1 Resources

PPS3 suggests that Local Planning Authorities prepare joint SHLAAs. However, the adjoining East Surrey authorities adjoining Reigate & Banstead have different timescales for SHLAA development. Therefore, this Assessment is confined to Reigate & Banstead but does not prejudice joint working arrangements in the future. Every effort will be made to ensure that the methodology and SHLAA findings are shared with the adjoining authorities of Tandridge, Mole Valley and Epsom & Ewell.

A Partnership Panel will be developed to guide the SHLAA. The Panel will consist of stakeholders who are representatives of house builders, property agents, registered social landlords as well as county and regional bodies, and inhouse Council departments. The representatives will provide expertise and knowledge to help the partnership to establish the deliverability and developability of sites, and how market conditions may affect economic viability.

#### 3.1.2 Project Management

The SHLAA will be undertaken in-house by Council officers. A project team has been established in order to carry out the Assessment effectively. The Project Team consists of:

- Policy Development Manager.
- Policy Development Officers.
- Monitoring Officer.
- Development Management Officers.
- Property Officers.
- Housing Officers.
- Environmental Protection Officers.

# 3.2 Stage 2: Determining which sources of sites will be included in the Assessment

The Practice Guidance advises that sources for sites with potential for housing can be found from sites in the planning process and sites not currently in the planning process.

#### Table 1 - Sources of sites with potential for housing

Sites in the planning process				
Land allocated for employment/other land uses which can be used for housing				
Land with permission				
Existing Local Plan housing designations (Horley North East/North West sectors)				
Unimplemented/outstanding planning permissions for housing				
Planning permissions for housing under construction				

Sites not currently in the planning process - examples:					
Land in non-residential use which could be suitable for housing -					
Brownfield/Greenfield land in the built-up area					
Surplus public sector land					
Vacant/derelict land and buildings					
Additional housing opportunities in residential areas, e.g. under-used garage					
blocks					
Sustainable urban extensions					

The Practice Guidance states that particular types of land or areas may be excluded from the Assessment. In the case that a type of land is excluded from the Assessment, the reasons for doing so will need to be justified and agreed by the members of the partnership. Appendix D sets out the proposed approach for constraints; these are relevant to Stage 7.

## 3.3 Stage 3: Desktop review of existing information

Table 2 lists available data sources that will be explored in the desktop review. Additional sites will be added through a 'call for sites' consultation process, which will run over a 4-week period in August/September 2010. This process will involve the public and stakeholders submitting sites that could be suitable for development or redevelopment. Where the public/stakeholders identify sites already on Council's database, these sites will be checked carefully to avoid double counting. Any sites that are submitted after the consultation will be noted and considered at the next review of the SHLAA.

Source	Purpose
RBBC Local Plan 2005	To review sites allocated for housing and to review
	employment allocations and its potential for housing
RBBC Local Plan Revised	To review sites that were previously considered as
Deposit Draft 2000	allocations but were rejected at the Public Inquiry of
	the Local Plan
RBBC Redhill Area	To review sites put forward for allocation in the Area
Action Plan Preferred	Action Plan
Options	
SHLAA 2009	To review sites and work closely with stakeholders to
	understand the latest situation with sites already
	included
Open Space Assessment	To review categories and assess sources that can be
	used for housing, e.g. Urban Open Land
Sites with planning	To review sites suitable for housing development that
permission	have not been implemented or completed
Sites under construction	To review sites that are already being developed. For

	example, Horley North East which will provide 710
	dwellings
Sites with planning	To review housing potential of sites that have been
permission refused	refused permission
Sites pending a decision	To review sites that are awaiting planning permission
Empty/Vacant Property	To identify vacant buildings that may have to
Register	potential to deliver a significant number of dwellings
National Land Use	For information on previously developed land and
Database	buildings in England that may be available for
	development
Register of Surplus	For information about surplus land owned by central
Public Sector Land	government bodies and their agencies
Ordnance Survey maps	To help identify land for housing from desktop
	sources
Aerial photography	To help identify land for housing from desktop
	sources
Surrey Estates Review	To review sites put forward in the Surrey Estates
	Review project
Employment Sites	To review employment sites from the Local Plan and
	the Council's Industrial Estates Monitor

#### 3.3.1 Site threshold

Between 1 April 2005 and 31 March 2010, 85% of residential completions within the Borough were on sites comprising 10 or more units, and 75% of completions were on developments of 15 or more units. Therefore, as a basis for this assessment, the Council only intends to include sites that are potentially capable of accommodating 10 or more residential units. Following this approach will help to keep the number of sites assessed at a manageable level.

Furthermore, if a site is submitted that is composed of several small sites which collectively meet the threshold then this will be included in the SHLAA as a single large site.

In the event that an appropriate source of sites does not come forward from the 10 plus threshold, the Council will revise the threshold to allow for smaller sites to be submitted and considered.

## 3.4 Stage 4: Determining which sites and areas will be surveyed

This stage will identify further sites with potential for housing development which were not identified at Stage 3. The Project Team will undertake a detailed survey of broad locations in the Borough that are considered likely to contain development opportunities.

The Practice Guidance recommends mapping the following areas to help identify geographic areas that could be covered by the survey (Stage 5):

- Development hotspots i.e. the focus of recent planning permissions.
- Town and district centres areas of frequent land change will therefore contain development opportunities. Centres will also be sustainable locations in relation to transport infrastructure.
- Principal public transport corridors for sustainable locations.
- Specific locations within settlements i.e. where regeneration, redevelopment strategies are being pursued.
- Specific locations outside settlements sites for further investigation i.e. those areas where significant infrastructure already exists or is planned.

Therefore, with the above in mind, the Council will undertake a street-by-street survey of the following areas:

- The town and village centres of Redhill, Reigate, Horley, Banstead.
- The regeneration areas of Preston and Merstham.
- The pedestrian catchments of Redhill, Reigate, Horley and Merstham railway stations (the 4 highest used train stations<sup>5</sup>).

In the event that these sources do not supply an appropriate number of sites, the pedestrian catchments of the Borough's lesser used train stations and public transport corridors will be surveyed.

Planning Policy Guidance Note 13: Transport<sup>6</sup> identifies walking as the most important mode of travel at the local level, as it offers the greatest potential to replace short car trips, particularly under 2 kilometres. Furthermore, the Department for Transport's 'Manual for Streets'<sup>7</sup> states that walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' walking distance of residential areas which residents may access comfortably on foot.

Therefore, to highlight the most sustainable housing locations, Geographic Information System (GIS) 'pedestrian catchment' buffers of 1250m (approximately a 15-minute walk) will be mapped for railway stations and 800m (approximately a 10-minute walk) will be mapped for town centres/regeneration area centres. Policy designations, such as flood zones, will also be layered over the maps to help visualise where more suitable potential housing land can be found. The sites identified in this process will be then visited at Stage 5.

<sup>7</sup> Manual for Streets (Department for Transport, 2007)

<sup>&</sup>lt;sup>5</sup> Transport Statement (Reigate & Banstead Borough Council, 2009)

<sup>&</sup>lt;sup>6</sup> Planning Policy Guidance 13: Transport (Communities and Local Government, 2001)

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# 3.5 Stage 5: Carrying out the survey

The sites identified at Stage 3 and 4 will be visited wherever possible by the Project Team. The following characteristics will be recorded on a site assessment form (Appendix C) for each site:

- Site size.
- Site boundaries.
- Current use(s).
- Surrounding land use(s).
- Character of surrounding area.
- Physical constraints (e.g. access, topography, location of pylons etc).
- Development progress (e.g. any ground work completed, number of homes started and completed).
- Sustainability attributes (e.g. proximity of site to services, transport etc).

The survey work will be carried out by members of the Project Team. Officers will be briefed prior to site visits to ensure that surveying and recording of information is consistent.

# 3.6 Stage 6: Estimating the housing potential of each site

The Practice Guidance recommends that the potential of each identified site should be guided by existing or emerging plan policy. The Borough Local Plan 2005<sup>8</sup> Policy Ho 9A states that residential development should only be permitted if a density of 30 dwellings per hectare (dph) net is achieved, except where lower density proposals are necessary to respect the character of the surrounding area. The policy also states that a density of at least 50 dph net should be achieved at locations with good public transport accessibility, such as town centres. However, the Local Plan policy contrasts with the latest amendment to PPS3 where the national indicative minimum density of 30 dph has been removed.

Policy Ho 13 also requires that maintenance of character is taken into account when residential development is contemplated. Only those proposals which conform to the pattern of development in the surrounding area and will not unreasonably affect the amenities of adjoining properties will be permitted.

Estimating housing potential should also consider national guidance: Planning Policy Statement 1: Delivering Sustainable Development (PPS1<sup>9</sup>) promotes the more efficient use of land through higher density, mixed-use development. In addition, PPS3 states that well designed and well located intensive development can enhance the character and quality of an area.

<sup>&</sup>lt;sup>8</sup> Borough Local Plan 2005 (Reigate & Banstead Borough Council, 2005)

<sup>&</sup>lt;sup>9</sup> Planning Policy Statement 1: Delivering Sustainable Development (Communities and Local Government, 2005)

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Therefore, the SHLAA will take a view of local and national guidance in respect of estimating density. It must be stressed, however, that the SHLAA only purports to estimate potential and does not prejudge the particular planning merits of any particular site or development proposed.

# 3.7 Stage 7: Assessing when and whether sites are likely to be developed

At this stage, each site will be assessed in relation to suitability, availability and achievability in order to understand whether a site can be considered deliverable, developable or not currently developable for housing development.

Deliverable	<ul> <li>Site is available now.</li> <li>Offers a suitable location for housing development.</li> <li>Offers a reasonable prospect of delivery within 5 years, from 2011 to 2016.</li> </ul>
Developable	<ul> <li>Site should be in a suitable location for development.</li> <li>Offers a reasonable prospect that it will be available for delivery in years 6-10 (2017-2021) or years 11-15 (2022-2026).</li> </ul>

The Practice Guidance divides Stage 7 into 4 separate stages in order to assess the likelihood of sites being developed.

Stage 7a	Assessing suitability – a site is suitable if it is in a suitable location
	and will contribute to the creation of sustainable, mixed communities
Stage 7b	Assessing availability – a site is considered available when there is
	confidence that there are no legal or ownership problems and where
	the owner/housing developer has expressed the intention to
	sell/develop
Stage 7c	Assessing achievability – a site is considered achievable where there
	is a reasonable prospect that housing will be developed on the site at
	a particular point in time. This stage is based on the economic
	viability of the site and the capacity of the developer to complete and
	sell the housing over a certain period
Stage 7d	<b>Overcoming constraints</b> – the Assessment will outline how
	constraints can be overcome. This may be by dealing with land
	ownership or a need for infrastructure

The Council will be undertaking an independent assessment for the viability of suitable sites, to allow for conclusions to be made on availability and achievability. This will ensure that a robust approach is achieved.

## 3.8 Stage 8: Review of the Assessment

After the initial survey and the assessment of deliverability/developability, information can then be collated to produce an indicative housing trajectory. The trajectory will set out how much housing can be provided and at what point in the future. Essentially, it will show whether there is a shortfall or oversupply of housing over the plan period. The Practice Guidance states that where there is a housing shortfall sites need to be reviewed.

In reviewing sites, those sites previously considered not viable at Stage 7 will need to be re-examined before they can be brought forward. This will entail reviewing sites' constraints and reviewing how they can be overcome in order for them to be included in the trajectory. If, after the review, there is still a shortfall of potential housing sites, then broad locations and windfalls will be identified.

# 3.9 Stage 9: Identifying and assessing the potential of broad locations

Broad locations are areas where housing development is considered feasible and will be encouraged, but where specific sites cannot yet be identified. Paragraph 53 of PPS3 requires that LPAs should set out in Local Development Documents their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption.

In order to inform the Core Strategy, the 2010 SHLAA will be an important piece of evidence providing information on the availability and suitability of housing. Its findings will also identify broad locations and specific sites that will enable the continuous delivery of housing for at least 15 years from the date of adoption.

In identifying broad locations, it will be necessary to follow the sustainability agenda and look to develop in areas where there is already infrastructure. For example, there may be sites that are not in the built-up area but are nonetheless relatively sustainable in terms of location. Furthermore, the site survey will allow for the identification of certain areas that have potential for development but may not yield specific sites.

The Practice Guidance suggests the following types of broad locations:

Areas within and adjoining settlements

The latest evidence from the Core Strategy directs development into the following locations in sequence:

- Redhill Town Centre.
- Horley Town Centre.

- Horley North East/North West sectors.
- Preston Regeneration Area.
- Merstham Regeneration Area.

Following these locations, the built-up areas of Redhill, Reigate, Horley and Banstead will be pursued (town centre locations first, followed by edge-of-centre locations within walking distance to town centres); and finally, other sustainable sites in the existing urban area. The areas within and adjoining the above locations will be appropriate for identifying broad locations of development.

#### Areas outside settlements

The Practice Guidance recommends a variety of options for areas outside settlement boundaries, for example, urban extensions, growth points, new free-standing settlements etc.

In light of the revocation of Regional Strategies, the Government has signalled that it is committed to the protection of the Green Belt and that LPAs are still guided by policies in Planning Policy Guidance 2: Green Belts<sup>10</sup>.

# 3.10 Stage 10: Determining the housing potential of windfalls

PPS3 sets a clear expectation that the supply of land for housing should be based upon specific sites, and where necessary, broad locations. However, it recognises that there may be genuine local circumstances where a windfall allowance is justified.

In the event that the SHLAA housing trajectory does not meet the housing requirement after identifying and assessing the potential of broad locations, and does not satisfy the demands for years 11-15 of the Plan, it will be necessary to explore windfalls.

The justification for using windfalls will be based on an estimate of the amount of housing that could be delivered in the area on land that has not been identified in the list of deliverable/developable sites, or as part of broad locations for housing development.

<sup>&</sup>lt;sup>10</sup> Planning Policy Guidance 2: Green Belts (Communities and Local Government, 1995)

### APPENDICES

- Appendix A Site Identification Form
- Appendix B Example of Site Location Plan
- Appendix C Site Assessment Form
- Appendix D Approach for constraints

#### **Appendix A – Site Identification Form**

#### Strategic Housing Land Availability Assessment (SHLAA)

#### Site Identification Form 2010

If you would like to make the Council aware of a potential housing site please complete this form. Please submit sites of 10 or more dwellings, with a view to development occurring by 2027. A separate form should be filled in for <u>each</u> site and a map provided at a scale of 1: 1250 showing the boundaries of each site (an example is included at Appendix B). If you need help producing a map please contact Robert Hayward (<u>Robert.hayward@reigate-banstead.gov.uk</u>).

Please do not submit sites that already have planning permission for residential development, unless a new and different proposal is likely in the future.

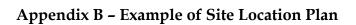
Completed forms and site location maps can be emailed to <u>LDF@reigate-banstead.gov.uk</u> or posted to the **Policy Team, Reigate & Banstead Borough Council, Town Hall, Castlefield Road, Reigate, Surrey RH2 0SH** and need to be received by Council no later than **10/09/2010**.

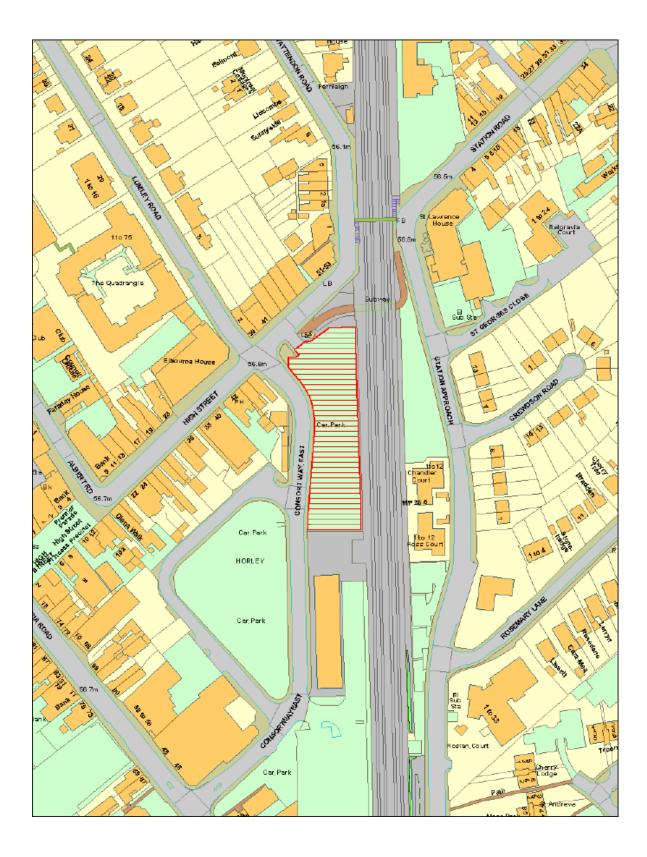
Your Details	
Name	
Company	
Address	
Postcode	Telephone number
E-mail address	
Landowner (provide	
contact details)	
Your interest in the Land	(please tick the relevant box)
Land Agent	
Registered Social	
Landlord	
Planning Consultant	
Developer	
Land Owner	
Other	
Site Address	
Address	
Postcode	

Site Details						
Site Area (Hectares)						
Current Land Use						
Sustainability Assessment						
Please provide details of proximity of site to infrastructure, services, community facilities and public transport What is planning history of the site?						
Please provide details of previous planning applications						
Surrounding Details						
Land Uses						
Character of Surrounding Area						
<b>Proposed Development</b>						
Uses & Floor space						
Please state your intentions for the site, i.e. residential only or mixed- use						
Housing types	1 Bed	2 Bed	3 Bed	4	1 Bed	Other
Number of units proposed						
Indicate the number of	2011-2016	2017 - 2021	2022 - 202	26	2027+	
units proposed to be built in timeframe						
When do you estimate being in a position to submit a planning application?						
When do you think you will be able to begin building work should permission be granted?						

<b>Constraints</b> <i>please provide</i>	information on constraints to development – refer to Appendix 4 for reference
Physical (e.g. access,	
steep slopes, potential,	
location of pylons,	
protected trees,	
contaminated land etc)	
Natural conservation	
(e.g. Green Belt, SSSIs,	
SACs, SNCIs, LNRs,	
AGLV, AONB etc)	
Built conservation (e.g.	
Conservation Areas,	
Listed buildings)	
0 /	
Planning Policy (e.g.	
Local Plan 2005 policies)	
Flood arrang (o a flood	
Flood areas (e.g. flood zone 1, 2, 3a or 3b)	
zone 1, 2, 3a or 3b)	
Any additional	
constraints	
If you have provided	
details of constraints,	
what measures do you	
propose to overcome them?	
<b>Other Information</b> for add	litional information not already included in this form

# PLEASE NOTE THAT ANY INFORMATION INCLUDED IN THIS FORM COULD BE USED IN THE SHLAA AND MAY BE PUBLISHED AND AVAILABLE ON THE COUNCIL'S WEB SITE.





# Appendix C – Site Assessment Form

Site Details			
Site Ref No.			
		RN (Unique	
	Pro	perty Ref No.)	
Address			
Ward			
Site Area (Hectares)			
Current Land Use			
Land Owner			
Surrounding Details			
Land Use			
Character of Area			
Assessing Suitability			
- second g calconity	Locations of:		Distance
Sustainable location?	Bus stop		
	Train		
Closest Bus, train cycle	Cycle route		
route?	Name of Centre		Distance
Closest town or local centre	Name of Centre		Distance
Contributes to			
sustainable / mixed			
communities			
If allocated land, is it still			
suitable?			
If there is a previous			
Planning Permission, is			
it still suitable?			
Policy Restrictions:			
- Designations			
- Protected Areas			
- Existing Planning			
Physical Problems:			
- Access			
- Steep Slopes			
- Flooding			
- Hazardous risk			
- Pollution			
- Contamination			
- Pylons			
Potential environment			
constraints:			
- Landscape features			
- Heritage features			
Natural features			
1	1		

Assessing Availability				
Legal Problems				
- Ransom strips	Number of owners			
Ownership Problems - Number of owners	Number of own	ers		
Other problems with				
ownership i.e.				
tenancies, operational				
requirements				
Assessing Achievability				
Market Factors:				
- Adjacent uses				
- Economic viability				
- Proposed & Alternative				
uses in terms of land				
values - Attractiveness				
of locality - Potential market				
demand				
Cost Factors:				
- Site preparation costs				
- Exceptional works				
necessary				
- Planning standards &				
obligations				
<ul> <li>Prospect of funding or</li> </ul>				
investment to address				
identified constraints				
Delivery Factors:				
- Developer's own				
phasing				
- Build out rates on				
larger sites				
- Single or several				
developer(s) - Size & Capacity of the				
Developer				
•	0044 0040	0047 0004	0000 0000	0007
How many units are assessed to be	2011-2016	2017 -2021	2022 - 2026	2027+
developed in				
timeframes?				
Based on Suitability / Availability / Achievability is the site likely to be deliverable / developable				
Site Deliverability				
(available now; suitable				
location for housing &				
housing delivered within				
5 years – 2011-2016)				

Site Developability (suitable location for housing; suitable for housing or housing / mixed use & good prospect of housing occurring after 2016 – 2017-2021)			
Recommended ways to overcome constraints that could achieve deliverability within 5 years			
E.g. - The need for new infrastructure - Overcoming fragmented land ownership - Environmental improvement - Amending policy			

#### **Appendix D - Approach for constraints**

#### Areas of Ancient Woodland

Ancient woodland is a non-statutory designation relating to areas which have been continuously wooded for at least 400 years. PPS9<sup>11</sup> requires Local Planning Authorities to identify areas of Ancient Woodland. Within the Borough there are a considerable number of ancient woodlands, and further smaller areas are currently being identified under a County-wide project. It is highly unlikely that these areas will yield housing sites. Therefore, unless there is a need to revisit sites to meet the housing allocation, it has been decided not to spend time or resources on looking for sites in these locations.

#### Areas of Great Landscape Value (AGLV)

AGLV are areas designated by the County Council as being of high visual quality and worthy of protection. For sites within or adjoining AGLV, each site will be assessed to consider whether the AGLV policy constraint would prevent development.

#### Area of Outstanding Natural Beauty (AONB)

AONB is a statutory national landscape designation. The primary purpose of AONBs is to conserve and enhance natural beauty. Part of the Borough area is located within the Surrey Hills AONB.

For sites within the AONB, each site will be assessed to consider whether the AONB policy constraint will prevent development of the site. Given that all AONB designations fall within the Green Belt designation, it has been decided not to spend time or resources on looking for sites in these locations. However, submitted sites may need to be revisited in order to meet the housing allocation.

#### Flooding areas

The Council will assess sites in regard to the Reigate & Banstead Strategic Flood Risk Assessment (SFRA). The SFRA divided the Borough into the following zones:

- Zone 1: Low Probability land assessed as having a less than 1 in 1,000 annual probability of river flooding in any year. Future development must first be sought within this area.
- Zone 2: Medium Probability land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding in any year. A considerable number of properties in Horley are Zone 2. Only if it can be demonstrated that, for logical planning reasons, there are no suitable sites within Zone 1, sites will then be sought within Zone 2.

<sup>&</sup>lt;sup>11</sup> Planning Policy Statement 9: Biodiversity and Geological Conservation (Communities and Local Government, 2005)

- Zone 3a: High Probability land assessed as having a 1 in 100 or greater annual probability of flooding in any year. A number of properties in Horley and Redhill are Zone 3a. Therefore, in accordance with the Sequential Test, if the SHLAA assessment finds that there are insufficient suitable sites for Highly Vulnerable Developments and/or there are wider sustainability benefits to a previously developed land, sites in this zone may be considered.
- Zone 3b: Functional Floodplain areas susceptible to flooding with a 1 in 20 or greater annual probability of flooding in any year. Areas immediately adjoining Redhill Brook and River Mole are Zone 3b. As with Zone 3a, if the SHLAA finds that there are insufficient suitable sites for Highly Vulnerable Developments and/or there are wider sustainability benefits to a previously developed land, sites in this zone may be considered.

#### Green Belt/Greenfield

All Green Belt sites will be considered in the SHLAA, and will be assessed in line with the housing requirement to check whether there is the need to potentially develop the proposed sites.

If there is the need, the SHLAA may then recommend further analysis of individual sites to see whether the site is still performing its original purpose of the Green Belt designation and to assess whether the strategic importance of the site may no longer outweigh the sustainable benefits of developing the site.

#### Land contamination and remediation

For sites proposed on former commercial or industrial land, or a site proposed in proximity to former landfill sites, the Council's Contaminated Land Officer will be consulted to assess viability.

#### Listed Buildings, Ancient Monuments, Conservation Areas, Archaeological Sites

For sites that come forward within or adjacent to Listed Buildings, Ancient Monuments and Conservation Areas, the Council's Conservation Officer will be consulted to assess actual development potential.

Sites within or adjacent to Archaeological Sites or Sites of High Archaeological potential may be referred to the County Archaeologist for comment.

#### Local Nature Reserves

Local Nature Reserve (LNR) is a statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949 by principal local authorities. LNRs are places with wildlife or geological features that are of special interest locally. The Council will consult with the Council's Green Infrastructure Officer on sites within LNRs to assess their development potential.

#### Open Space

The Council's Open Space Assessment (2008) for the Borough found that there is adequate access to parks and countryside in the Borough. It would be unlikely that a designated park would be considered appropriate for development.

However, the study is being reviewed and some areas of informal open space which do not contribute significantly towards the recreational needs of the residents of the Borough may be considered for development. Any areas of open space that are identified as potential residential development sites will be assessed against the findings of the PPG17 (update) Study.

#### Previously Developed Land (PDL)

In accordance with PPS3, development should be considered on PDL in order to ensure the effective use of land. Some land is not considered as previously developed land such as residential gardens, parks, recreation ground and allotments, which, although may feature paths, pavilions and other buildings, have not been previously developed. Sites identified for development will need to be assessed to assess whether they are PDL. The SHLAA will seek to ensure that there are sufficient sites identified on PDL to ensure that the national target of achieving 60% is reached.

#### Regionally Important Geological or Geomorphological Sites (RIGGS)

RIGGS are geological or geomorphological sites in the County area that are considered worthy of protection for their educational, research, historical or aesthetic importance. RIGGS are broadly analogous to Sites of Nature Conservation. The Council does not intend to consider any sites that fall within RIGGS. It is highly unlikely that these areas will yield housing sites. Therefore, unless there is a need to revisit sites to meet the housing allocation, it has been decided not to spend time or resources on looking for sites in these locations.

#### Residential Areas of Special Character (RASC)

RASCs are areas that have been selected for their attractive character and is dependent on the relationship between the buildings and their surroundings. It is highly unlikely that these areas will yield housing sites. Therefore, unless there is a need to revisit sites to meet the housing allocation, it has been decided not to spend time or resources on looking for sites in these locations.

#### Sites of Nature Conservation Importance (SNCI)

There are approximately 40 SNCIs and approximately 40 potential SNCIs in the Borough. As part of a rolling programme, Surrey Wildlife Trust is actively

surveying potential SNCIs – to be identified by the Council – and re-surveying current SNCIs in order to assess their County level status.

It is highly unlikely that these areas will yield housing sites. Therefore, unless there is a need to revisit sites to meet the housing allocation, it has been decided not to spend time or resources on looking for sites in these locations.

#### Sites of Special Scientific Interest (SSSI)

SSSIs are legally protected under the Wildlife and Countryside Act 1981 and, therefore, are an important national and ecological designation. There are 4 in the Borough. It is highly unlikely that these areas will yield housing sites. Therefore, unless there is a need to revisit sites to meet the housing allocation, it has been decided not to spend time or resources on looking for sites in these locations.

#### Special Areas of Conservation (SAC)

SACs are areas which have been given special protection under the European Union's Habitats Directive. They provide increased protection to a variety of wild animals, plants and habitats and are a vital part of global efforts to conserve the world's biodiversity. The Borough's only SAC is the Mole Gap to Reigate Escarpment, which is designated because of its variety of natural features, such as, being the only known locality in the UK that features stable communities of Box woodland on rock slopes.

It is unlikely that sites in this location will be appropriate development sites. Therefore, time and resources will not be spent looking for sites in these locations. If a site is proposed from an independent source, the constraints due to the SAC designation will be assessed by the Council's Green Infrastructure Officer.

Furthermore, the Appropriate Assessment of the Core Strategy identified certain constraints that would need to be addressed to deliver the strategy. Although individual development outside the SAC would not directly impact the designation, policies would need to be developed to ensure that overall future development in the Borough would not have a detrimental effect on the SAC. This involves ensuring that adequate recreation space is available in the Borough to ensure that the recreation areas in the SAC are not used to such an extent that they would result in damage to the protected flora and fauna. This overall consideration will be given to all sites in the SHLAA.