



Our Local Plan

Housing and Economic Land Availability Assessment (HELAA) (2017- 2018)

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1. Introduction

Background

- 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 document that informs plan-making, but it does not in itself represent policy nor does it determine whether a site should be allocated for development in the future or influence the determination of any planning application. Land allocations can only be made by local authorities through a Development Plan Document, such as a Local Plan.
- 1.2 The preparation of the HELAA is a requirement of the National Planning Policy Framework (NPPF)¹. The HELAA assesses potential land and sites for their development potential focusing on their suitability (the physical ability of a site to be developed), availability (the willingness of a landowner to make a site available for development) and achievability (the ability of a site to be delivered).
- 1.3 The HELAA determines whether a site could be developed, not whether it should or would be. It does not represent policy or determine whether a site should be allocated or granted planning permission should an application be received.
- 1.4 The assessment of sites and locations set out in this HELAA follows the methodology approved at Tandridge Council's Planning Policy Committee in March 2015 for undertaking the process as well as the relevant sections of the NPPF and the Planning Practice Guidance (PPG).
- 1.5 This HELAA 2017/18 supersedes and combines earlier iterations of the document published in 2016 and the Interim HELAA on Broad Locations published in 2017. It is consequently split into two parts.

What is included in this Report?

- 1.6 The Council adopted a preferred strategy in March 2017, which is to be pursued in preparing the Plan. The strategy includes the need to identify and allocate suitable sites on the edge of urban and semi-rural service settlements. It also requires the identification of a broad location within which a strategic scale development that accords with the Town and Country Planning Associations 'Garden City' principles, can be delivered. The two

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

elements of the strategy require differing methods for the identification and assessment of sites. It is therefore appropriate for this HELAA review to be split into two parts.

Part 1 – Individual Sites

1.7 Part 1, covered in Chapters 3 – 9 of this HELAA, builds upon and updates the 2016 Report. It has assessed the development potential of sites submitted to the Council through the HELAA process. The report presents the following key outputs:

- Details, including maps, of sites submitted as part of the HELAA process;
- An assessment of the suitability of each site for development;
- A notional development capacity that could be delivered on each site assessed to be suitable;
- A calculation of the potential windfall delivery of housing for the district²; and
- An indicative trajectory of development that could come forward.

1.8 The indicative trajectory includes sites that are suitable as per the HELAA methodology, and therefore not just those which accord with the preferred strategy for the Local Plan. As such, not all of the sites included in the trajectory will be considered for inclusion in the Plan.

Part 2 – Broad Locations

1.9 Part 2, covered in Chapters 10 – 14, provides an update to, and supersedes, the Focused Interim HELAA- Broad Locations. (2017), which was published as part of the evidence base used to inform the Local Plan: Garden Villages Consultation 2017. Part 2 of the HELAA assesses the suitability and availability of a number of areas which meet the Councils criteria to be considered as a broad location.

1.10 It should be noted that the treatment and assessment of an individual site through the HELAA process, is different than a cluster of sites being treated as a broad location. Sites which are found to be unsuitable or unavailable as an individual site may not be considered in the same way when looking at a broad location. As part of the interim HELAA the Council has looked at clustered HELAA sites that when considered together could deliver large

² Windfall delivery relates to the delivery of housing which will come forward on unidentified sites or on sites that fall below the minimum HELAA threshold within the plan period.

scale development, as well as significant sized sites/ site parcels submitted in the context as a self-sustaining settlement.

- 1.11 As such, there may be sites that are considered positively as part of a broad location in interim HELAA document, which are not considered to be suitable or available in Part 1 of this iteration of the HELAA.
- 1.12 It is an important part of the HELAA and site assessment process that sites can be assessed in a number of ways to ensure they have been fully considered.
- 1.13 Please note, this HELAA reflects the information known to be correct to the Council at the time of writing and no site submitted after 31st December 2017 has been assessed, but will be considered in future iterations of the HELAA.

What the HELAA does and what it does not do

- 1.14 Whilst the HELAA is a key document, it is only one part of the evidence base used to inform the preparation of the Local Plan. It is important to understand what the HELAA does and does not do. This is presented in Table 1, below.

Table 1: Table showing summary of what the HELAA does and does not do

What it is	What it is not
A document that informs Local Plan preparation	A process that directly allocates land for development
A process for identifying and assessing any sites that may have a part to play in meeting the development needs of the area	A document that excludes the consideration of land in the Green Belt
A document that provides the Council with a general understanding of the development potential of sites	A document that grants planning permission for sites or suggests that planning permission would be granted
A process that allows a windfall allowance to be calculated	

Terminology clarification

- 1.15 Traditionally the land considered through the HELAA process is referred to as a 'site'. The HELAA 2017/18 refers to land in a number of ways and for clarity each of the following terminologies and their definitions are set out below:

- 1.16 **Site** – a single parcel of land that has been submitted to the Council for consideration through the HELAA process. An individual site will usually have one representative that may be the landowner or a developer. However, on larger sites, there may be a number of landowners. All sites will have a site boundary that distinguishes the extent of the site that has been submitted and which is usually the landownership boundary. This term is predominantly used in Part 1 of the HELAA 2017/18.
- 1.17 **Broad Location** – a broad location is a general area that has development potential. A broad location may cover a number of individual sites, only a few sites or none at all. Broad locations do not always have a defined boundary and it is the principal of development that is being considered. If a broad location is pursued by a local authority and subsequently allocated in a Local Plan, it is through the evidence gathering process and the preparation of local development policies that the precise extent of land will be determined. This term is predominantly used in Part 2 of the HELAA 2017/18.
- 1.18 **Garden Community** – A Garden Community refers to what is being sought for delivery through the Tandridge Local Plan and is referred to in this document for context in terms of how the HELAA Broad Location work feeds into the wider plan-making process. All information relating to a Garden Community and details etc will be set out in the development plan which once adopted, will include the Local Plan and an Area Action Plan. This term is predominantly used in Part 2 of the HELAA 2017/18.

2. Policy Context

National Policy and Guidance

- 2.1 The NPPF and the accompanying Planning Practice Guidance (PPG) identifies that the Government wants to use the planning system to significantly boost the supply of housing³ and support sustainable economic growth⁴. In order to facilitate this, assessing the development needs of the district and identifying specific and deliverable sites is a critical aspect of the Local Plan process.
- 2.2 Specifically, the requirement for local authorities to produce a land assessment which enables realistic assumptions about the **availability, suitability and achievability** of land to meet identified development needs for the duration of the plan period is set out in paragraphs 159 and 161 of the NPPF. The NPPF identifies the advantages of carrying out land assessments for housing and economic development in tandem, to ensure that sites can be considered for the most appropriate use.
- 2.3 The PPG provides advice on how to undertake HELAAs. Simply put, the advice states that a HELAA should:
- Identify sites and broad locations with potential for development;
 - Assess their development potential and suitability; and
 - Assess the likelihood of development coming forward (availability and achievability).
 - Assess whether the site and broad locations are deliverable, developable or non-developable.
- 2.4 This advice was taken on board when finalising the Tandridge HELAA methodology and undertaking the site assessments.
- 2.5 National planning policy is clear that the Green Belt should only be altered in 'exceptional circumstances'. However, as the HELAA is a 'policy-off' process, sites within the Green Belt are assessed but no recommendation about alterations to the Green Belt boundary, are made. Green Belt boundaries can only be altered through the preparation of a Local Plan and it is only through that process, and on reflection of the wider evidence base, that any decision regarding alterations to the Green Belt, can be made.

³ NPPF, Paragraph 47

⁴ NPPF, Paragraph 19

Local Policies

- 2.6 Tandridge District Council's local planning policies are set out in the Core Strategy (adopted in 2008) and the Detailed Policies Document (adopted in 2014). These documents continue to be used in determining planning applications.
- 2.7 The Council is preparing a Local Plan which, once adopted, will replace the Core Strategy and will be using the evidence base, including the HELAA, to inform the Plan preparation. As such, sites and the broad locations assessed as part of the HELAA process are done in a 'policy-off' manner in that they are not judged in detail against current local planning policies the way a planning application would be, although regard may be had to current policies to provide appropriate context.

Part 1 – Individual Sites

3. Methodology

Establishing a Methodology

- 3.1 The first part of the process was the establishment of an agreed methodology for undertaking the HELAA and this was developed whilst taking into account national policy and advice contained in the NPPF and PPG. The methodology (including a name change of the process from SHLAA to HELAA), was adopted on 19th March 2015 at Planning Policy Committee.

The Process

- 3.2 The adopted methodology sets out a 5 stage approach, based on the approach identified in the PPG, for undertaking the Tandridge HELAA, as set out below:

- 1) Site identification;
- 2) Site assessment;
- 3) Windfall assessment;
- 4) Assessment review; and
- 5) Final evidence base.

- 3.3 The above approach has been followed and the various stages have been addressed in the subsequent sections of this report.

Types of sites

- 3.4 This HELAA considers sites for housing, employment and Traveller uses. Accordingly, the subsequent sections of the HELAA relate to sites capable of accommodating the different types of land uses. If a site is considered capable of accommodating a mix of uses, generally it is assessed within the housing sites section.

PART 1 – HOUSING SITES

4. Potential Housing Sites

Background

- 4.1 A major reason for undertaking the HELAA process is to ensure that a variety of potential housing sites are assessed to understand potential land supply within an area. This information, along with other evidence, is subsequently utilised to inform the preparation of the Local Plan.
- 4.2 It should be remembered however, that a Local Plan is prepared on reflection of a great deal of information in addition to the HELAA. Whilst a HELAA must consider the development potential of all sites, a Local Plan will only select those that accord with the strategic direction of a plan and that perform sufficiently against the wider evidence base that underpins a Local Plan. As such, a site identified as suitable, available and achievable in the HELAA will not be automatically included within a Local Plan or allocated for development.

Site Identification

- 4.3 The Council has determined that the extent of the assessment area should be the entire district. This approach allows the Council to consider all sites from the outset and accords with the methodology set out in the PPG.
- 4.4 The sites assessed as part of the HELAA are identified from multiple sources, which include the following:
- Sites submitted by landowners/developers for the Council to consider;
 - Sites included in previous iterations of the HELAA process;
 - The Council's own land/assets as identified through any corporate review; and
 - Sites identified through the pre-application advice service or where planning permissions had lapsed or been refused but might be granted in future.

Call for Sites

- 4.5 The Council has a 'rolling' Call for Sites programme where a site/land can be submitted at any point. The Council will, however, put in place a deadline for submission to facilitate the management and assessment process, enabling the HELAA to be published.

4.6 This HELAA (2018) considers all individual sites entered into the process up until 31 December 2017.⁵ Any additional individual sites received after this period and up to the point of completing the report, are listed in Appendix 8 of the document and will be more fully considered through the next review of the HELAA.

Site Assessments

4.7 Information used in the assessment of sites is gathered from a variety of 'desktop' sources that include:

- The Council's in house GIS data which includes information on flooding, historic assets, landscape and environmental designations and other relevant information;
- The site promoter's site submission form;
- Meetings between council officers and site promoter's, where they took place⁶; and
- Relevant planning applications.

4.8 Regard is also had to any relevant information submitted by landowners/developers either as part of the HELAA process or through formal consultation on the Local Plan. This can include information pertaining to constraints on a site and/or its availability.

4.9 In addition, sites assessed are visited by Planning Policy Officers to verify information gathered through the 'desktop' process. Site visits enable officers to establish whether there are any additional uses and/or constraints present on the site which had not been identified through the desktop phase.

Suitability Assessment

4.10 Suitability is a high level assumption about whether a site could be developed, not whether a site should or will be developed or allocated. The suitability of a site is one, albeit crucial, aspect of the HELAA assessment. Determining a site's suitability is done by taking into account information available to the

⁵ The Council had intended to prepare and publish a HELAA in 2017 which would have included all sites submitted up until 31 December 2016. However, it was determined to be more effective to combine the 2017 and 2018 processes and publish an assessment which covered the both periods.

⁶ In accordance with the Council's HELAA methodology, a number of meetings between Council officers and site promoter's, landowners and developers took place during April to May 2016. These focussed on sites which had been identified as being suitable and available at that time and gave the Council the opportunity to clarify information which was then considered when preparing the HELAA 2016.

Council to help build up a picture and general understanding of the site area in relation to its development potential.

- 4.11 When assessing the suitability of sites, consideration was given to all sites submitted and only where no feasible development potential could be demonstrated were sites deemed to be unsuitable. This may have been due to certain constraints, for example flooding and where there was no information available to demonstrate how that constraint could be mitigated or overcome. However, mitigation may be possible and information can become available and therefore unsuitable sites will remain in the HELAA process and will be reassessed for their suitability in subsequent review periods and where further information becomes available.
- 4.12 Also considered when assessing suitability were physical problems or limitations of the site or immediate surroundings. These included, but were not limited to, the following:
- Whether the site could be accessed;
 - Whether topography or ground conditions would prevent development;
 - Locational suitability; and.
 - Whether a site was a suitable size or could deliver an appropriate yield.
- 4.13 In determining locational suitability, a judgement was made that if a site was not within or immediately adjacent to a sustainable settlement, then it would not be a suitable location for development at this point in time. The exception to this was if a HELAA site, when combined with another HELAA site, would be adjacent to a sustainable settlement. In this context, the Tandridge District Settlement Hierarchy 2015 and update 2018 (as shown in Figure 1) was used to define whether a settlement was sustainable or not. If a site was adjacent to a settlement categorised as a limited or unserved settlement, it was seen as being locationally unsuitable and would have been ruled out on such grounds.

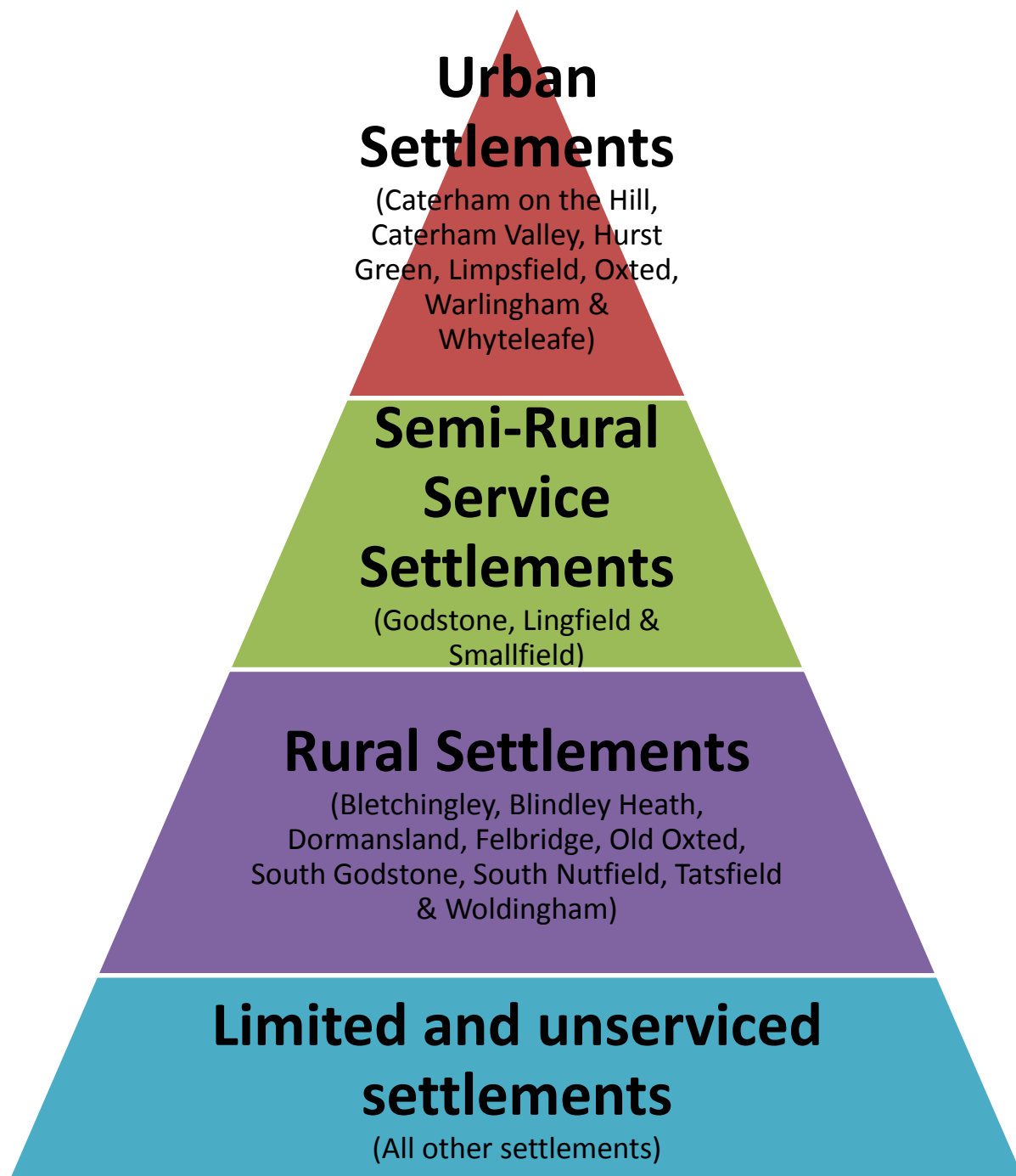


Figure 1: Tandridge District Settlement Hierarchy

4.14 If sites had no known constraints or limitations that would prevent development, then it was viewed as being suitable. It is important to note that existing policy constraints, such as the Green Belt, were not considered to prevent the site from being assessed to be suitable and it is for the Local Plan and the wider evidence base, to determine whether a site is to be allocated for development or not.

4.15 Finally, as part of the suitability assessment and in accordance with both the PPG and the adopted methodology, the HELAA only considers sites and broad locations capable of delivering five or more dwellings or economic development on sites of 0.25ha (or 500m² of floor space) and above. If it was apparent at the desktop stage that sites would not be able to satisfy these criteria, they would be considered 'non-qualifying' and no further consideration of them would take place. However, they have been kept on the file for the purposes of considering whether there is a potential supply of windfall development, and in case site sizes or circumstances change when the HELAA is reviewed in the future.

Availability Assessment

4.16 Availability is important in the HELAA process as it helps to establish whether a site is a valid option for consideration and relates to a landowner's willingness to see a site developed. Given the role of the HELAA in enabling the Council to establish a land supply for future development, if there is an element of doubt over whether a site will come forward or that certain constraints prevent it from being considered available (e.g. current long term occupation or a lack of commitment from all landowners where multiple parties are involved), then it cannot realistically be included as a potential option.

4.17 In addition, attention was given to the following questions in ascertaining whether the site could be judged as being 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 10 years' time?
- Are there any legal or ownership problems?
- What is preventing the site from being available and what measures could be taken to address this?

4.18 Officers have and will contact relevant landowners/developers where it is considered necessary to determine availability.

4.19 Sites which have been found unavailable will remain in the HELAA process but will not be seen as potential options for the allocation of land or be able to contribute to potential land supply in the shorter term. Should the Council receive information that the availability of sites has altered, this will be reflected in subsequent HELAA Reports.

Achievability Assessment

- 4.20 Section 3, Paragraph 21⁷ of the PPG explains 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.*” It continues by explaining that it “... *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.*”
- 4.21 Assessing achievability requires a specialist knowledge and understanding of the market factors, cost issues and delivery of development which is key to understanding and considering the development potential of a piece of land. To secure this knowledge and in the 2015 iteration of the HELAA, the Council commissioned BNP Paribas to carry out a high level and independent assessment of site viability, using a sample of sites being considered through the 2015 HELAA process. This work is included as Appendix 2 to this Report and was done in liaison with a selection of development professionals and council officers who are familiar with development in the district and who have an understanding of the local housing market. This ensured that the variables used in site testing were appropriate for the local context.
- 4.22 A key output of this study was to raise awareness of the elements that may be a factor in identifying viable and deliverable sites through the plan-making process and the barriers which the Council may need to consider when refining development options and drafting policies. The study represented the first stage in the assessment of site viability and reflects information gathered at that point in time.
- 4.23 As the Local Plan progresses towards its final state and as more information on individual sites becomes known, further work on site viability will be necessary. Such work will play a role in demonstrating that the Local Plan’s preferred strategy can be achieved and policies implemented. A whole plan viability assessment, also carried out by BNP Paribas in 2018, has been prepared to accompany the Local Plan and informed decisions on land allocations through that process. The updated viability work has not altered the consideration of any sites in the HELAA 2017/18.

Estimating Site Capacity

- 4.24 Calculating the approximate potential capacity of a site is a key aspect of the HELAA. This allows the Council to understand the development potential of sites.

⁷ Reference ID 3-021-20140306

Developable Areas

- 4.25 In order to arrive at a site capacity, it is important to establish the developable area as this is not always the same as the site area submitted. To this effect officers have considered the extent of the developable areas of sites and this is reflected in each of the site assessments.
- 4.26 The developable areas were drawn based on a number of factors. This included, but is not limited to, the following:
- Ancient Woodland (and 15m⁸ buffer);
 - Undeveloped land in Flood Zone 3⁹;
 - Areas of Outstanding Natural Beauty (AONB) (as well as areas recognised as candidates for AONB extension); and
 - Sites allocated for Minerals and Waste use.
- 4.27 Furthermore, in some instances there were other site specific reasons for reducing developable areas. This included issues such as the topography of the land, potential land contamination or any other demonstrable obstacles that would inhibit development on a particular site.

Potential yield

- 4.28 Yield relates to the net amount of housing that could be delivered on a particular site. When considering yields, consideration was given to developable areas of sites, potential housing densities on reflection of existing character areas and built form¹⁰ and estimates of site capacity provided by site promoters¹¹. Regard was also had to detailed work undertaken on sites that had been assessed as part of the previous iterations of the HELAA, any planning applications, where applicable and planning judgement.
- 4.29 An acknowledgement of local character is essential to successful planning and also understanding the realistic capacity of a site. It is essential that a balance between local character, meeting development needs and optimising the capacity of a site is important. As such, the use of local knowledge and common sense has often fed into the estimated yield, in instances where applying a blanket density would be inappropriate. For example, where the

⁸ At the point of writing, the Forestry Commission and Natural England had published information relating to the need to consider 50m buffers to Ancient Woodland. However, there is no clarity over the policy weight of this information and therefore current guidance/policy has been utilised to inform this HELAA. Should a requirement to consider 50m, become formal guidance/policy this will be reflected in future iterations of the HELAA.

⁹ Land at risk of flooding at least every 1 in 20 years

¹⁰ The Council's Urban Capacity Study

¹¹ Proposed yield is a question on the site submission proforma but the submitter may not always complete that question or know with any certainty. Submissions for the HELAA are made by both planning professionals and general members of the public; in other cases a range was submitted. As such a consistent consideration of capacity must take place meaning that officer judgement is used which may differ from what is.

proposed yield stated in the site submission differs substantially to the densities of the existing built form, the site has been assessed further to see what could realistically be accommodated and the yield could therefore be different to sites of a similar size elsewhere.

- 4.30 The 2017/18 Report provides yield estimates on every site identified as being deliverable or developable.

Site Categorisation

- 4.31 The determination of a site's suitability, availability and achievability combined with timeframe for development, directly informs the overall site assessment as either:

- Deliverable,
- Developable, or
- Non-developable

- 4.32 The NPPF explains in footnote 11 to Paragraph 47 that for a site to be considered deliverable, it *“should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that development will be delivered on site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years”*.

- 4.33 Paragraph 47 continues in footnote 12 by explaining that for a site to be considered developable, it *“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. A developable site is Suitable, Available and Achievable and has timeframe for development of 5-10 years or 10+ years”*.

- 4.34 In order to ensure that we abide by the above guidance, we have classified suitable, available and achievable sites as either being deliverable or developable. This is explained in the sub-headings below.

Deliverable

- 4.35 For the purposes of this report, deliverable sites are those that are: suitable, available and achievable and not currently located within the Green Belt. Based on information available, deliverable sites are considered capable of coming forward within 5 years and would likely be supported by the existing development plan.

- 4.36 Sites considered to be deliverable can be found in Appendix 3.

Developable

4.37 For the purposes of this report, we have classified sites as being developable if they are either:

- Suitable, available and achievable sites that are located within a defined settlement boundary, but specific information suggests that development could not come forward within 5 years; or
- Suitable, available and achievable but currently located within the Green Belt and would rely on a change in policy to guarantee their delivery.

4.38 The reason for classifying sites located within the Green Belt as developable is due to the fact that the HELAA assumes that such sites will, where justified, come forward through the plan-led system as allocation and will rely on an alteration to policy before realistically coming forward. The Local Plan is not envisaged to come into effect until 2020 and achieving planning permission and developing sites could take varying amounts of time to come forward and secure permission. As such, we have assumed that completions on such sites would not be until the 2024-2022 monitoring year at the earliest

Non-Developable

4.39 A site is non-developable where the prospect of development is unlikely as it does not meet the criteria of being suitable, available and achievable. As such, there are multiple reasons as to why a site would be considered non-developable. Lists of non-developable sites categorised as unavailable or unsuitable can be found in Appendix 4.

Future Updates

4.40 As the HELAA is an iterative process, any future reviews will look at additional information available for the Council to consider, including any new sites which are submitted to the Council for assessment through the HELAA. Additionally, further consideration of potential yields and determination of net developable areas will be considered in future versions of the report and in liaison with site owners and/or their promoters.

4.41 The HELAA is published alongside other evidence base studies which collectively inform the Local Plan, and as such it should not be considered in isolation and does not take account of those other evidence based documents, as their primary purpose is to inform the Local Plan and not to inform the HELAA.

5 Windfall Calculation

Background

- 5.1 The NPPF's glossary identifies windfall sites as "*sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available.*" The NPPF does not consider development on residential garden land to be windfall development, which is a change from earlier planning policies pre-dating the planning reforms which introduced the NPPF. As such, whilst the Council are still keen to understand small site development of all types, calculations¹² for windfall do not include garden development.
- 5.2 Paragraph 48 of the NPPF states that local planning authorities may make an allowance for windfall sites in the five-year supply based on the following criteria:
- a. They have compelling evidence that such sites have consistently become available in the local area; and
 - b. These sites will continue to provide a reliable source of supply.
- 5.3 An allowance for windfall development may also be made in Local Plans to assist local authorities in meeting their identified housing target. If doing so, the NPPF and Planning Practice Guidance is clear that any allowance should have regard to the Strategic Housing Land Availability Assessment (called the HELAA by Tandridge District Council), historic windfall delivery rates and expected future trends.

Approach

- 5.4 The delivery of unidentified small sites in the District has been and will continue to be an integral source of housing supply, and therefore the HELAA should include an estimation of future housing delivery through windfall sites. The Council proposes to only include a windfall allowance for sites capable of accommodating less than 5 net dwellings within its land supply. Sites capable of providing 5 units or more should be identified through the HELAA process and as such, will not be counted as windfall as it risks the prospect of sites being double counted.

Historic Windfall Delivery

¹² Historically, a significant contribution to the housing supply has come from residential garden land; however the Government has explicitly excluded this element from windfall calculations (NPPF para. 48).

5.5 The [2016 HELAA](#) set out the Councils approach to calculating a windfall allowance for sites capable of accommodating less than 5 dwellings. This work has since been updated to include the completions in the last two financial years 2016/2017 and 2017/2018, and is set out in table 3, below. It identifies that 2016/2017 saw a steep decline of windfall allowance, whereas the 2017/18 monitoring period showed a significant increase on the previous year's records.

Table 2: Table showing small site windfall completions between 2006 and 2018

Year	Total Small Site Windfall Completions	Total Small Site Windfall Completions on Residential Garden Land	Total Small Site Windfall Completions Excluding Residential Garden Land
2006/2007	53	19	34
2007/2008	51	26	25
2008/2009	40	17	23
2009/2010	46	21	25
2010/2011	37	16	21
2011/2012	39	12	27
2012/2013	64	31	33
2013/2014	82	41	41
2014/2015	38	20	18
2015/2016	66	33	33
2016/2017	18	10	8
2017/2018	78	18	60
Average	51	22	29

Future Trends & Estimating Windfall Allowance

5.6 When estimating a windfall allowance, the NPPF states that consideration should be given to future trends as well as to long-term historic delivery rates.

Changes to national planning legislation which allow offices to be converted to residential dwellings will inevitably result in a supply of windfall. That said, it is not easy to know or estimate the extent to which future trends for windfall supply will alter. As such, it is seen as more appropriate to use average historic delivery rates and project these forward at a rate of 29 dwellings per year. The Council will review the windfall calculation annually both through the Authorities Monitoring Report (AMR) and HELAA reviews.

6. Notional Housing Trajectory

Background

- 6.1 An important aspect of the HELAA is to use the results of the site assessments to produce a notional housing trajectory up to 2033, the end of the plan period for the Local Plan currently under preparation.

Assumptions Used

- 6.2 As well as utilising the results of the site assessments, the notional housing trajectory also includes a windfall allowance of 29 units per annum. It should be understood that the trajectory is based on general assumptions and is used for indicative purposes only. The Council's full housing trajectory setting out future anticipated land supply will be set out in the Local Plan and will be reflective of formal land allocations, fully considered phasing and up to date monitoring figures on completions and commitments.
- 6.3 It is not the purpose of the HELAA to suggest which sites should come forward for development or to allocate sites. It will be the Local Plan which ultimately makes such decisions. Instead, the HELAA identifies sites that could accommodate development and sets out whether sites are considered to be deliverable, developable or non-developable.
- 6.4 As the decision of which sites will be allocated is yet to be made, the trajectory includes all sites that have been assessed as being deliverable and developable in the HELAA. The trajectory is based on a number of other general assumptions with regards to completion dates, build out rates and use of a windfall allowance. These issues are explained below.

Completion Dates

- 6.5 The existing development plan would generally support development in locations that are not in the Green Belt, and as such, any site which would not require an alteration to Green belt policy could realistically be delivered within the first five years of the HELAA trajectory and is considered to be deliverable.
- 6.6 The trajectory also assumes that completions on sites assessed as being developable would begin in the 2024/25 monitoring year. This is as the Local Plan is not envisaged to come into effect until 2020 and developable sites are likely to rely on an alteration to Green Belt policy.

Build Out Rates

- 6.7 The trajectory has taken a pragmatic approach and made an assumption on build out rates which are largely dependent on the number of dwellings that the development of a site could yield, with larger sites generally having a higher build out rate. Such assumptions have been refined since earlier iterations of the HELAA based on additional information received and further work done.

6.8 The assumptions used are as follows:

- A site accommodating up to 20 dwellings would take a year to build out;
- A site accommodating between 21 and 60 dwellings would take 2 years to build out;
- A site accommodating between 61 and 99 dwellings would take 3 years to build out;
- A site accommodating between 100 and 399 dwellings would be built out at a rate of 65 dwellings per year (assumes a single developer);
- A site accommodating between 400 and 999 dwellings would be built out at a rate of 130 dwellings per year (assumes 2 developers); and
- A site accommodating 1000 or more dwellings would be built out at a rate of 200 dwellings per year (assumes 3 developers).

6.9 It is recognised that in the first year that completions are projected to come forward, the build rate may be slower as development may have only occurred for part of that year. Accordingly we have assumed that in the first year where completions are projected, the maximum build out rates would be the following:

- Up to 20 units on sites that could yield up to 60 dwellings;
- Up to 25 units on sites between 61 and 99 dwellings; and
- Up to 30 units per developer on sites that would yield 100 or more dwellings.

Indicative Housing Trajectory

6.10 This indicative housing trajectory reflects those sites which have been found suitable, available and achievable. This trajectory also only reflects that of the findings of the HELAA and will assist in determining the formal housing supply table for the Councils Local Plan which will take account of the HELAA, other evidence, the Councils strategic intentions for growth and existing supply through permissions and commitments¹³.

Table 3: A table that presents the Council's notional housing trajectory

	2019 - 2024	2024 - 2029	2029 – 2033+
Deliverable Sites	407		
Developable		8428	13625

¹³ Please note the notional trajectory only includes relevant information for individual suitable, achievable, deliverable and developable sites set out in Part 1 of the HELAA. Whilst development potential of broad locations is considered in Part 2 of the HELAA and could provide further suitable development land, the delivery of a broad location is insufficiently detailed at this stage in the HELAA process to attribute build-out trajectories. A formal allocation in the Local Plan and subsequent detailed assessment of a specific broad location would provide this detail. Any individual suitable and available sites which are also considered in the context of a broad location, are included in the above notional trajectory where relevant.

Sites			
Windfall	145	145	145
Cumulative(5yr)	552	8,573	13,770
Cumulative (total)	22,895		

Future Updates

6.11 This section will be revised when the HELAA is next updated to take into account additional information received by the Council in relation to site suitability, build out rates and yields and any new sites found to be suitable and available.

PART 1 - EMPLOYMENT

7. Potential Employment Sites

- 7.1 Paragraph 161 of the NPPF states that “*Local planning 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 the identified needs.*”
- 7.2 The Tandridge Economic Needs Assessment Update (ENA) was undertaken on the Council’s behalf by GL Hearn in 2017. This work superseded that of AECOM who carried out an Economic Needs Assessment in 2015. The ENA 2017, focusing on B-use class employment¹⁴, provides an assessment of the current commercial property dynamics in Tandridge, including a survey of existing businesses, an estimate of the District’s future need for employment land, an assessment of the development opportunities at existing sites in the District and any residual requirement. The findings of the ENA are used by the HELAA to inform the assessment of employment sites ensuring that sites in current employment use are a factor for the HELAA.
- 7.3 Chapter 6 of the ENA 2017 provides a review of existing and potential employment land within the District. The site surveys include an assessment of a site’s suitability and its development potential including its ability to be intensified and/or expanded. Reference is made to the information included within the ENA below, but the full assessment is not replicated here.

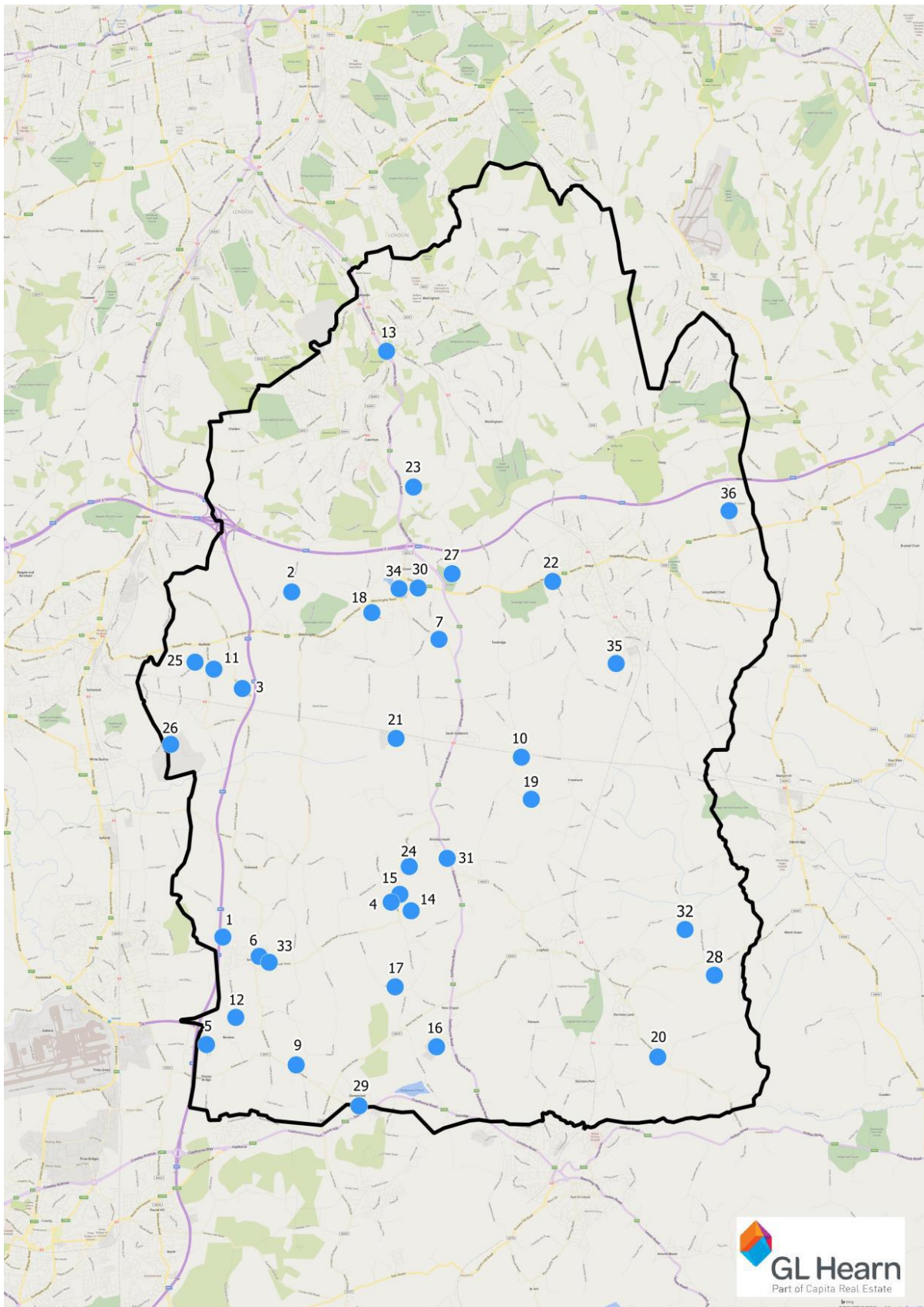
Table 4: taken from ENA Update 2017 (Table 16) - List of existing and potential employment sites reviewed.

No. on map	Site	Nearest Settlement	Size (ha)
1	Balfour Beatty Site	Smallfield	1.81
2	Brewer Street	Bletchingley	2.38
3	Brewing Research International	South Nutfield	0.74
4	Brickhouse Farm Trading Estate	Blindley Heath	1.63
5	Bridges Wood, Church Lane	Burstow	6.17
6	Brown Utilities	Smallfield	0.49
7	Builders Merchants	Godstone	1.37
8	Burstow & Shipley Bridge	Burstow	40.0
9	Cophall Farm	Burstow	8.0
10	Crow Hurst Lane	Crowhurst Lane End	0.34
11	Dickinson House (Mid Street)	South Nutfield	0.43
12	Flightpath Farm	Burstow	1.79
13	Godstone Road Business Centre	Warlingham	2.09
14	Hays Bridge Farm	Blindley Heath	1.86
15	Haysbridge Business Centre	Blindley Heath	1.02
16	Hobbs Industrial Estate	Felbridge-	22.0
17	Hoppings Bones Lane Timber Yard	Newchapel-	1.58
18	Ivy Mill Lane Workshops	Godstone	1.92
19	Kingswood Farm Business Park	Lingfield	1.03
20	Ladycross Business Park	Dormansland	1.00

¹⁴ B1 office, B2 industrial and B8 warehousing and distribution

21	Lambs Business Park	South Godstone	12.8
22	Oxted Colour Printers	Oxted	0.38
23	Paddock Barn Farm, Godstone Road	Caterham	3.45
24	Parkwood Industrial Estate	Blindley Heath	0.74
25	Priory Farm	South Nutfield	1.46
26	Redhill Aerodrome	South Nutfield	6.68
27	Rooks Nest Farm, Godstone Road	Godstone	0.82
28	Skitts Manor Farm	Dormansland	0.39
29	Snowhill Business Centre	Copthorne	0.35
30	Surrey County Council Depot	Godstone	2.22
31	Systems House	Blindley Heath	0.98
32	Telescope House	Lingfield	0.44
33	The Old Norton Site	Smallfield	0.49
34	Timber Merchant	Godstone	0.66
35	Warren Lane Depot	Oxted	0.9
36	Westerham Road Industrial Estate	Westerham	8.61

Map taken from ENA Update 2017 (Figure 26) - Location of existing and potential employment sites reviewed.



- 7.4 The sites have all been considered as suitable for continued employment use, apart from three sites. The Balfour Beatty site in Smallfield is not currently in employment use and is likely to remain in use as a depot for Highways England. The site therefore cannot be considered to contribute to the District's employment land supply at this time.
- 7.5 Similarly, the Surrey County Council Depot in Godstone and Warren Lane Depot, Oxted are not currently in B-class employment use and there is little prospect for the redevelopment/ intensification for such uses. The sites cannot therefore be considered as part of the Council's employment land supply. That said, the Council will keep these sites under review in future iterations of the HELAA to establish if there is any development potential on these sites for employment uses in the future.
- 7.6 It will be for the Local Plan document to determine which employment sites should be allocated and policy protected for economic uses and on balance of employment land needed.

Site Assessments

Assessing the suitability and achievability of sites

- 7.7 The ENA provided a qualitative assessment of each of the sites listed above. The assessments were based on criteria set by GL Hearn and agreed by the Council. The HELAA has not reassessed the sites' suitability and achievability and instead utilises the ENA's findings to determine suitability at this point in time. The Council will reassess such sites in future HELAA and/or ENA updates as necessary.

Assessing the availability of sites

- 7.8 The majority of sites considered for employment purposes by the ENA are in existing use and are considered available for the purposes of this HELAA period. Where development potential of sites was not considered possible at this time but a possibility for the future, i.e. Burstow and Shipley Bridge, Smallfield; availability was not considered to be demonstrated.
- 7.9 It will be particularly important for the Council to keep the prospect of availability under review due to the rules on permitted development rights, which could mean that employment sites could be lost to residential conversion. This matter will be considered through future HELAA reviews and the Authorities Monitoring Report (AMR).

Estimating Site Capacity

- 7.10 The ENA provides information on vacant land and potential intensification and expansion capacity. The potential site capacities listed in the ENA have been used to inform the HELAA. In preparing the Local Plan, other evidence may become available and alter the consideration of potential site capacity.

Findings

7.11 In total 19 sites were considered to have intensification opportunities amounting to over 26ha of potential employment land.

Table 5: Information extracted from ENA Update 2017 (Table 18) - Sites with Intensification Opportunities

Site Name	Type	Area (ha)	Use class
Key Strategic Employment Site		14.16	
Hobbs Industrial Estate	Vacant land	3.88	Mix B1/B2/B8
Lambs Business Park	Vacant land	7.44	Mix B1/B2/B8
Westerham Road Industrial Estate	Vacant land	2.84	B2/B8
Important Employment Sites		6.06	
Brewer Street	Vacant land / Dilapidated unit	1.22	Mix B1/B2/B8
Cophall Farm	Vacant land	4.15	B8
Ladycross Business Park	Vacant land	0.22	Mix B1/B2/B8
Paddock Barn Farm, Godstone Road	Vacant land	0.44	Mix B1/B2/B8
Snowhill Business Centre	Vacant land	0.03	B1
Local Employment Sites		2.10	
Brickhouse Farm Trading Estate	Vacant land	0.48	B2/B8
Flightpath Farm	Vacant land	0.30	B2/B8
Haysbridge Business Centre	Vacant land	0.18	Mix B1/B2/B8
Kingswood Farm Business Park	Dilapidated unit	0.10	B2/B8
Redhill Aerodrome	Redevelopment underway ¹⁵	0.43	B1/B8

¹⁵ Permission to replace fire damaged units.

Rooks Nest Farm, Godstone Rd	Redevelopment underway ¹⁶	0.56	B1/B8
Telescope House	Vacant land	0.05	B1/B8
Other sites		4.54	
Bridges Wood, Church Lane	Vacant land / Dilapidated unit	4.15	Mix B1/B2/B8
Brown Utilities	Vacant land	0.02	B1
Dickinson House (Mid Street)	Vacant land / Dilapidated unit	0.08	Mix B1/B2/B8
Hays Bridge Farm	Dilapidated units	0.29	Non B class
Total (All Sites)		26.86	

Future Updates

7.12 As the HELAA is an iterative process, any future reviews will look at additional information available for the Council to consider. This will include any additional sites submitted for assessment. The Council will reassess such sites in future HELAA and/or ENA updates as necessary.

¹⁶ Construction of employment land currently underway.

PART 1 - TRAVELLER SITES

8. Potential Traveller Sites

Background

- 8.1 The NPPF (2012) and its supplementary document, Planning Policy for Traveller Sites (PPTS) (2015), sets out the Government's policies and expectations in relation to planning for the needs of Gypsies, Travellers and Travelling Showpeople (where relevant, collectively termed as 'Travellers' in the remainder of this report).
- 8.2 The PPTS is clear that local planning authorities should identify accommodation need for Travellers, set pitch and plot targets (for Gypsies/Travellers and Travelling Showpeople, respectively) in Local Plans and identify sites to meet such targets.
- 8.3 Tandridge's need for Traveller sites was initially assessed in the Traveller Accommodation Assessment (TAA), undertaken in 2013. It identified a need for 63 pitches and 26 plots between 2013 and 2028.
- 8.4 The Council recognised that the changes to the PPTS had an impact upon the way in which needs are calculated, and commissioned a new TAA to inform the Local Plan. The new Gypsy and Traveller Accommodation Assessment was published in 2017 and found a current and future need of 5 pitches and 21 plots between 2016 and 2033.
- 8.5 The Local Plan will take into account the conclusions of the TAA 2017 and any subsequent updates, among other factors, when drafting policies for pitch and plot provision.

Site Identification

- 8.6 The Council is taking a proactive approach to identifying sites for assessment through the HELAA process and is primarily using two sources; sites submitted as part of a Call for Sites and sites where there is a current planning application for increased provision.

Call for Sites

- 8.7 In early 2014, the Council undertook a specific Call for Sites asking for potential Traveller sites to be submitted for consideration as part of a Traveller Sites Document that the Council were to prepare. Only a handful of sites were submitted as part of this process and the Council decided not to continue with a specific Traveller Site Document but to consider allocations as part of the Local Plan. Since then, sites have been able to be submitted to the Council via the rolling Call for Sites the Council employs as part of the wider HELAA process.

Live Planning Applications

8.8 As well as considering sites submitted specifically to the Council for assessment in the HELAA, the Council also considered it appropriate to assess sites where a planning application has been submitted for additional Traveller accommodation. It is important to note that the judgement reached when assessing such sites through the HELAA process has no impact on the consideration of the live planning applications.

Site Assessments

8.9 The suitability, availability and achievability of sites submitted to the Council for Gypsy, Traveller and Travelling Showpeople uses are assessed through the wider HELAA process.

8.10 To ensure that the assessment of sites was undertaken in a consistent manner, a template was developed; this is shown below. In developing the template, regard was had to relevant policies in the plan-making section of the Planning Policy for Traveller Sites.

1. Site Characteristics	
Aspect	Information to note
Location	Address
Current Land Use	Whether the site is greenfield/brownfield. If brownfield, what use is it and whether it is vacant or occupied.
Size	Hectarage and amount of plots/pitches that could be accommodated
Topography	Whether the site is level enough for traveller accommodation.
Availability	Whether the site has been made available for traveller use.
2. Environmental	
Aspect	Information to note
Flood Risk	Which flood risk zone(s) the site is located within. Whether there are known to be other sources of flooding (groundwater, drainage, etc.)
Environmental Health	Whether there is potential land contamination, noise or air quality issues associated with the site.
Environmental Designations	Whether the site lies in or adjacent to SSSIs, LNRs, Ancient Woodland, etc.
Landscape Designation	Whether the site lies in the AONB etc.
Green Belt	Whether the site lies within the Green Belt.
3. Social	
Aspect	Information to note
Accessibility/ Proximity to services	Whether the site benefits from access to services such as schools, doctors, shops, etc.
Accessibility to transport modes	Whether the site has safe vehicular, pedestrian and/or cycle access to the site. Whether the site can be accessed by public transport. Whether the site has good access to the primary highway network.
Relationship with settled communities	Whether the site, if developed for traveller use, would impact on the amenity of nearby residents by impacting on surrounding settlements or affecting local character or visual appearance.

- 8.11 The assessments were undertaken based on information gained from site submission forms, site visits, desktop assessments and, where applicable, information submitted as part of a planning application. In addition, information on sites was also gained following discussions with colleagues in Planning Enforcement, Development Management and Environmental Health. Should more information come from these or other sources, the conclusions in the assessments may alter in future reviews.

Assessing the suitability of sites

- 8.12 When assessing the suitability of sites, consideration was given to the aspects covered in the template above. For example, if a site was predominantly in an area of high flood risk (i.e. Flood Zone 3) then it would be assessed as being unsuitable.
- 8.13 In the above Flood Zone 3 example, the conclusion reached would be the same if the site was assessed for housing. However, in some circumstances, particularly from a location perspective, it is necessary to assess Traveller sites differently due to the nature of Traveller sites provision. Whilst it is important that Traveller sites are situated in locations that allow for access to services and infrastructure provision, it is generally accepted that Travellers reside in relatively remote locations. Therefore, if a site is in existing use for Travellers, or is adjacent to a site in existing use for Travellers, but is not adjacent to a sustainable settlement, then the Council has considered the site to be suitable, from a location perspective. If, however, a site is not currently in use as a Traveller site, then the Council will consider it to be unsuitable if it is not adjacent to an existing settlement, on the basis of it being in an unsustainable location.
- 8.14 Policy B of the PPTS requires that local planning authorities ensure that Traveller sites are in sustainable locations. Accessibility to services has therefore been considered through the assessment template. It should be remembered that due to the nature of the Traveller way of life, the consideration of what is 'sustainable' may vary from that of standard bricks and mortar housing.
- 8.15 Further, the AONB designation does not automatically restrict development of sites for Traveller uses as the relatively minor level of development is likely to have a lesser built effect than housing development.
- 8.16 As with the assessment of potential housing sites in this HELAA, potential Traveller sites that are located in the Green Belt are not instantly ruled out on that basis. Indeed it is recognised that all of the sites under consideration for Traveller uses are located in the Green Belt, which is not surprising given the character of the District and the nature of Traveller sites.

8.17 Policy E of the PPTS explains that where exceptional circumstances can be demonstrated, sites for Traveller use can be allocated by altering the Green Belt boundaries through the plan-making process to meet identified needs. Whether exceptional circumstances exist to justify Green Belt release for Traveller sites is not a consideration for the HELAA. As such, while the location of sites within the Green Belt is recognised, no potential Traveller site has been ruled out on Green Belt grounds but would be a consideration for the Local Plan process.

The sites have been assessed to be in one of the three following categories:

1. Sites that are suitable – Those sites that could be considered to be suitable for allocation and it is believed that any issues can be overcome.
2. Sites with issues to overcome – Those sites that have an issue(s) and it is not known at this point whether such issues can be addressed.
3. Sites that are not suitable – Those sites where an issue or issues prevent the site from being considered as suitable and are not capable of being overcome.

Assessing the availability of sites

8.18 As the sites have been submitted to the Council by or on behalf of landowners or are subject to a live planning application, it is assumed that all of the sites are available.

Assessing the achievability of sites

8.19 Consideration was given to the general achievability of sites as part of the assessment and any obvious constraints that could prevent a site from coming forward were noted. The potential financial implications of mitigating constraints and comprehensive viability testing will be undertaken on sites which are to be considered for allocation through the Local Plan.

Estimating Site Capacity

8.20 For the assessments, we have assumed a development density of 15 pitches per hectare, unless a different and realistic figure has been identified by those submitting the site. The sites have been assessed for being suitable for either Gypsy and Traveller pitches or Travelling Showpeople plots, depending on what was indicated by the landowner/agent.

8.21 On a number of the sites, mobile homes and pitches are already in existence. In such cases, the assessments have noted therefore both the gross and net amount of pitches that could be delivered.

Site Categorisation

8.22 The assessments for each site can be found in Appendix 7. A summary of the findings are presented in the table, below.

Table 6: Overall findings of the assessment of Traveller Sites

Overall			
Category	Suitable	Issues to overcome	Not suitable
Yield	4 sites – 35 pitches	9 sites – 41 pitches	4 sites – 19 pitches & 17 plots.

Future Updates

8.23 As the HELAA is an iterative process, any future reviews will look at additional information available for the Council to consider. This will include additional sites submitted to the Council for Traveller provision and consideration of potential pitch/plot yields based upon liaison with landowners and site promoters. As such, conclusions on the suitability, availability and achievability of sites can change.

PART 1 - CONCLUSIONS

9. Findings and Next Steps

Introduction

9.1 This section of the report summarises the main findings of the Housing and Economic Land Availability Assessment (HELAA) and indicates how the findings will be used to inform the development of the Local Plan.

Potential Housing Sites

9.2 **14** sites were considered to be deliverable, meaning that they could come forward in the next 5 years. Collectively these sites are estimated to be able to deliver 407 dwellings.

9.3 **109** sites were considered to be developable, meaning that they could come forward in 5 or more years' time, between 2024/25 and 2033 and beyond. Collectively, these sites are estimated to be able to deliver **22,053**. This figure excludes estimated windfall figures and only includes individual sites identified in the HELAA. As with the deliverable sites, maps and site assessment information for sites considered to be developable can be found in Appendix 3.

Potential Employment Sites

9.4 The Economic Needs Assessment Update 2017 (ENA) identified a number of suitable employment sites across the District that should be retained and/or intensified for increased use.

Potential Traveller Sites

9.5 **4** sites were considered suitable for Traveller accommodation. Collectively, such sites could deliver up to **35** pitches should they come forward through the Local Plan process.

9.6 **9** sites were identified as having issues that would need to be overcome before they could be considered suitable for Traveller accommodation. Collectively, it is thought that such sites could deliver up to **41** pitches should the issues be overcome.

Windfall Housing Delivery

9.7 The Council has estimated that it could make an allowance for **29** dwellings per year coming forward on small¹⁷ windfall sites. Such an allowance is considered appropriate given the strong history of housing delivery on such sites in Tandridge.

Indicative Housing Trajectory

9.8 Using the information collected on sites assessed as being deliverable and developable for housing, the Council has produced a notional housing

¹⁷ Sites that deliver between 1 and 4 net dwellings and are not built on residential garden land.

trajectory for the period 2019-2033+. **For the purposes of the trajectory only**, the Council has assumed that all sites assessed as being deliverable would come forward between 2019 and 2024 and all developable sites would come forward from 2024 – 2033+.

	2019 - 2024	2024 - 2029	2029 – 2033+
Deliverable Sites	407		
Developable Sites		8428	13625
Windfall	145	145	145
Cumulative(5yr)	552	8,573	13,770
Cumulative (total)	22,895		

- 9.10 The Council note that the cumulative total above significantly exceeds that of the identified housing need set out in the Strategic Housing Market Assessment of 9,400 units, up to 2033. However, the HELAA considers the development potential of a site only and as set out in the PPG¹⁸ should not be constrained by the need for development, but instead provide an audit of land which can inform the Local Plan. Therefore, it is therefore not constrained by an upper limit in terms of the number of sites it can assess.
- 9.11 As is appropriate and in recognition of the HELAA as a document that assesses the development potential of land and not one which has the policy remit to allocate land, the trajectory includes sites that are suitable as per the HELAA methodology, but which do not all accord with the preferred strategy for the Local Plan. As such, not all of the sites included in the HELAA and indicative trajectory will be considered for inclusion in the Plan. Where this applies, the proformas for each site set this out for clarity.
- 9.12 The Local Plan will be the document which determines the local housing delivery target to be set, as well as the locations of all other types of development on reflection of the HELAA and the wider evidence base.

¹⁸ Planning Practice Guidance Paragraph: 009 Reference ID: 3-009-20140306

PART 2 – BROAD LOCATIONS

10. Introduction

Background

- 10.1 Sites of all types, shapes and sizes have been submitted to the Council for consideration through the Housing and Economic Land Availability Assessment (HELAA) process. Each of the submissions has been assessed in accordance with the adopted HELAA methodology (2015) and the guidance set out on the National planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
- 10.2 Part 1 of this document has assessed a variety of individual sites for their development potential and further detail of the assessment process is set out accordingly.
- 10.3 Part 2 of this document considers larger areas of land known as broad locations. It assesses the development potential of land that could be considered for development in the longer term. Part 2 of this document has been prepared to further detail the methodology used in carrying out the assessment of broad locations. **The assumptions do, in some ways, differ from those used to assess individual sites and it is possible that the conclusion on it may differ between the assessment undertaken in Part 1 as an individual site and the assessment of the broad location in Part 2.**
- 10.4 Paragraph 47 of the NPPF, the PPG (Paragraph: 001 Reference ID: 3-001-20140306) and paragraphs 7.3 and 7.4 of the Council's adopted HELAA Methodology 2015, recognise the value of identifying broad locations for development where they are of benefit. The Interim HELAA: Broad Locations (2017) document first set out this assessment process and Part 2 of the HELAA 2017/18, updates and supersedes it.
- 10.5 The primary assessment output of Part 2 is whether an area is suitable as a broad location and whether it demonstrates development potential for the longer term. It does not, however, allocate any of these areas.
- 10.6 Areas being considered as a broad location can comprise a number of individual HELAA site submissions, one single site submission, or sites that have been identified through other means e.g. Council evidence gathering.

What is included in Part 2?

- 10.7 Part 2 of the HELAA 2017/18 assesses the suitability and availability of a number of areas which meet the Council's criteria to be considered as a broad location. This document sets out the basic criteria.
- 10.8 The broad locations considered in this document are predominantly within the administrative areas of Tandridge District. However, where locations which cross authority boundaries have arisen through the process (i.e. land submitted) and promoted to both Tandridge Council and the corresponding authority, these have also been considered, as far as is practicably possible. Any cross-boundary locations would be considered by the other relevant authority, in accordance with their own evidence base. It is through the Duty to Cooperate and respective Local Plan-making processes, that a comprehensive understanding of cross-boundary development potential will be understood.
- 10.9 The impacts and benefits of development of any broad location is a matter for the wider Local Plan process and this HELAA merely identifies broad locations where further evidence gathering and reflection will be needed.
- 10.10 Part 2 of the HELAA 2017/18, presents the following key outputs:
- Details, including maps, of locations being considered;
 - An assessment of the suitability of each broad location;
 - Identifies key constraints that would need to be overcome and which could present an obstacle to development;
 - A point in time assessment of availability of the land considered within the broad location being assessed; and
 - A notional development capacity that could be delivered at each location.

11 . Broad Locations Assessment Process and Methodology

11.1 This part of the HELAA document sets out the methodology for assessing broad locations and expands upon the adopted 2015 methodology, setting out how locations have been identified and the criteria for their assessment, and makes a judgement about their suitability and availability.

Information gathering/sources

11.2 Information used in the assessment of broad locations was gathered from a variety of 'desktop' sources that included:

- The Council's in house GIS data which includes information on flooding, historic assets, landscape and environmental designations and other relevant information;
- Developer/promoter submission forms;
- Information gained from meetings between council officers and site promoter's, where they took place;
- Information contained in representations on the Local Plan: Issues and Approaches document, Local Plan: Sites Consultation document and Local Plan: Garden Villages document;
- Any supplementary information that developer/promoters may have provided to the Council on sites within the location being considered; and
- A variety of evidentiary information prepared to inform this process including landscape assessment and relevant and up to date technical data.

Site visits

11.3 Site visits to the locations have been undertaken by officers for the purposes of verifying information on constraints and familiarisation with the locations being assessed. Additional site visits will be undertaken separately in the preparation of the Local Plan where necessary to do so.

Developer/promoter meetings

11.4 Meetings have taken place between the Council and land promoter/owners, where applicable, to discuss, challenge and understand any intentions for the location. These meetings have taken place at various points up to and including the early part of 2018.

Assessment process

Stage 1 - Location Identification/source

- 11.5 The remit of the HELAA process covers the entire District and as such no area of the District is automatically ruled out or excluded from consideration. All sites and locations are assessed in accordance with the adopted HELAA methodology.
- 11.6 To ensure that the Council has done its due diligence in considering all possible alternatives, the following locations were prioritised for assessment as a broad location:
- A. Physically unconstrained land identified through the Council's evidence gathering processes; more information on this is set out below under 'SWOT Analysis' and in the various iterations of the Council's Spatial Approaches topic papers.
 - B. Locations where sites submitted to the HELAA process existed and when cumulatively considered, could accommodate significant development.

A: SWOT Analysis

- 11.7 In exploring reasonable alternative ways to meet development needs through the Local Plan, the Council carried out a strengths and weaknesses, opportunity and threats (SWOT) analysis of the entire District to identify any areas that were notably unconstrained of absolute constraints such as Areas of Outstanding Natural Beauty, Flood Zone 3 and Ancient Woodland. Pragmatic planning judgment has been used to determine where mitigation can take place, and where the mitigation would be so extensive that development would be majority unlikely.
- 11.8 From this piece of work, 7 locations were identified and considered through the HELAA in terms of their suitability and availability as a potential broad location. These 7 locations were:
- Blindley Heath
 - North of Cophorne
 - Hobbs Industrial Estate
 - Horne
 - Lambs Business Park
 - Lingfield
 - South Godstone

11.9 The SWOT analysis did not take account of availability or deliverability of land in these locations and this is a consideration for the wider assessment process and subsequently, the Local Plan. As such the SWOT process was not influenced by sites or locations submitted to the Council.

11.10 Further information regarding the SWOT analysis is detailed in the Council's Spatial Approaches Topic Papers which were published in 2015 (Issues and Approaches), 2016 (Sites Consultation) and 2017 (Garden Villages Consultation), which available on the Council's website.

B: Site/location submissions

11.11 Since 2011 when the strategic housing land assessment process began, over 400 sites have been submitted to the Council, to be considered for their development potential. Sites in the process vary greatly in terms of their size, shape, location and development potential.

11.12 For the purposes of identifying and considering broad locations the Council has looked at:

- Clustered HELAA sites that when considered together could deliver large scale development (see section on minimum parameters); and
- Significantly sized sites/site parcels, submitted to be considered in the context as a self-sustaining settlement.

11.16 In addition to the 7 locations identified through 'Source A: SWOT Analysis', the following locations have been considered in their capacity as a broad location and were submitted to the Council for consideration of their development potential:

- Chaldon – Land at Alderstead and Tollsworth Farm
- Land West of Edenbridge
- Redhill Aerodrome

11.17 Each of these locations was submitted to the Council for consideration and each includes large areas of land which straddle the boundaries of both Tandridge district and neighbouring authority areas. The cross-boundary location of these areas is a key consideration for the Council in preparing its Local Plan when assessing deliverability and will be a key matter to be addressed through the Duty to Cooperate and to demonstrate to a Planning Inspector that all reasonable alternatives have been properly considered in arriving at the final Local Plan and all opportunities to meet needs, explored.

11.18 All three sites were submitted to each of the relevant neighbouring authorities for consideration through their own processes. Each authority will carry out their own assessments in accordance with their own policies and development strategies.

Stage 2 - Assessing the suitability of a broad location

11.19 Suitability is a high level judgement about whether development *could* take place, not whether it *should*, or *will*. The assessment of suitability is one, albeit crucial, aspect of the HELAA and determining suitability is done by taking into account information available to the Council to help build up a picture and general understanding of the location and its development potential.

11.20 For the purposes of assessing broad locations, 3 predominant suitability criteria were applied:

- Test 1 - Locational Suitability
- Test 2 - Minimum Parameters
- Test 3 - Wider landscape impact

11.21 Existing policy constraints including Green Belt have not been applied to the suitability assessment for broad locations and, along with infrastructure considerations, is a matter for the wider Local Plan process. This HELAA determines whether a broad location is suitable for further consideration only.

11.22 Further information relating to the assessments of each broad location is set out later in Part 2 of this HELAA.

Test 1 - Locational Suitability

11.23 The HELAA process considers all sites across the entire District. As such, locational suitability will always be achieved where land is located within the district boundaries, either in full or partially, i.e. where land is across administrative boundaries. Where land straddles boundaries, suitability will be determined based upon information available, but it is recognised that delivery of that location is a matter for the Local Plan and the Duty to Cooperate.

11.24 When assessing individual sites for development (Part 1) the HELAA would usually find sites which are not immediately adjacent to a sustainable settlement, unsuitable. Due to the nature of a broad location and its purpose being to provide a self-sustaining settlement in its own right, this restriction

does not apply and any location can be considered suitable, subject to the next test for suitability: minimum parameters.

Test 2 - Minimum Parameters

11.25 In order to establish what constitutes a broad location for the purposes of the assessment, minimum parameters have been set which must be met before proceeding to the next test of suitability. Fundamentally this meant determining:

- the minimum number of homes that would need to be accommodated within the broad location; and
- the minimum amount of employment land which would need to be accommodated within the broad location.

11.26 To arrive at minimum parameters, officers carried out a desktop review of academic papers, policy documents and comparable applications for strategic scale development and new settlements. The documents considered and information used, include:

- the Policy Exchange paper on Garden Villages¹⁹,
- the Government's Locally-led garden villages, towns and cities²⁰ and earlier Ecotowns prospectuses²¹; and
- live case examples²² from other authorities.

11.27 On reflection of this information the minimum parameters which must be met for an area to be eligible for consideration as a broad location are that the land within the broad location must have a reasonable prospect of accommodating²³:

- At least 2,000 units at 30 dwellings per hectare, and
- 2.5ha of employment land.

11.28 This threshold was cognisant of how many units the development would need to deliver to require the on-site provision of basic infrastructure such as a primary school. Any development with fewer units would be unlikely to do so.

¹⁹ <http://www.policyexchange.org.uk/publications/category/item/garden-villages-empowering-localism-to-solve-the-housing-crisis>

²⁰ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508205/Locally-led_garden_villages_towns_and_cities.pdf

²¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7773/pps-ecotowns.pdf

²² Applications, allocations and masterplans.

²³ Where reference is made to large-scale, or strategic scale development in this document, it should be considered in the context of meeting the minimum parameters.

The employment allowance is proportionate to the population generated by a 2,000 unit development and employment space densities.

Test 3 - Wider Landscape impact

- 11.29 Tandridge is a predominantly rural district with high quality landscape and includes two Areas of Outstanding Natural Beauty (AONB). The landscape in the District is highly valued and continues to act as a constraint to development where impact is difficult to mitigate.
- 11.30 In arriving at the Council's preferred strategy for the Local Plan, there has had to be an acceptance that the delivery of a Garden Community, which will be informed by this HELAA, will inevitably affect the immediate surrounding landscape. However, an understanding as to the extent of impact upon the wider landscape is a factor of suitability. As such, the Council commissioned landscape architects to carry out assessments of areas²⁴ being considered through the plan-making process and this evidence has been used to inform the suitability assessment of Part 2 of this HELAA.
- 11.31 Any location that was found to have a high impact on the wider landscape (low capacity to accommodate large scale development) was found to be unsuitable and will not be considered further as a broad location. Concurrently, any location found to have a medium or low impact upon the wider landscape (medium and high capacity to accommodate large scale development) was considered to be suitable in HELAA terms. This piece of work considered the ability to mitigate against impact and bore this in mind when arriving at its conclusions.
- 11.32 Based upon the three tests for suitability set out above, any locations found to be a suitable at each test is further considered in the Local Plan making process and against the wider suite of evidence that is compiled to inform and underpin the preparation.

Stage 3 - Assessing the availability of sites

- 11.33 Availability is an important consideration in the HELAA process as it helps to establish deliverability and whether there is a willingness of the landowner(s) to see their land developed. Given the role of the HELAA in enabling the Council to establish a land supply for future development, if there is an element of doubt over whether land will come forward then it cannot

²⁴ <https://www.tandridge.gov.uk/Planning-and-building/Planning-strategies-and-policies/Local-Plan-2033-emerging-planning-policies/Local-Plan-2033/Evidence-base-and-technical-studies>

realistically be included as a potential option. Important factors which contribute to determining availability include existing occupation of any buildings on land within the area, complex landownership issues e.g. probate or disputes; legal covenants and promotional/option agreements.

11.34 The nature of a development and the point at which development is intended to take place plays a key role in how detailed the understanding of availability is at a point in time. For example, if a site is expected to be delivered in the short-term, the Council would need clear guarantees that it would happen with clear willingness of landowners and developers committed to early delivery. For sites which would be intended to come forward in the latter part of a plan period, covenants could be resolved before its assumed delivery period, land vacated by tenants and legal agreements signed. The role of broad locations in the planning process is to ensure there is sufficient land for the latter part of the plan period.

11.35 Important questions to ask in determining availability include:

- Are there any available sites within the broad locations?
- Are the landowners willing to see their land developed?
- Are there multiple owners/ransom strips?
- What legal agreements and options are in place, or in progress?
- Is the site likely to be available at a point in the future? If so, when?
- Are there any legal or ownership problems?
- What is preventing any sites from being available and what measures could be taken to address this?
- Are there any significant constraints or requirements of the development that need to be overcome before development can take place? If so, how long will it be before the land is available for development?

11.36 The Council recognise that in a similar manner to individual sites (Part 1), there may be instances where land has been promoted to the Council, or which is included within a broad location, that may not have been agreed by the landowner. As such, the Council will take a pragmatic decision based on the information that is available to them and only where information exists to suggest that the majority of land is available will the broad location also be considered available.

11.37 The Council has consistently sought the most accurate data from landowners/site promoters to assist in making judgements on land availability and further investigation of land availability will take place through subsequent HELAA reviews and the preparation of the Local Plan, where it applies.

11.38 Only locations which are able to demonstrate a reasonable prospect of being commenced within the plan period and able to notably contribute to supply up to 2033, will be considered available. Whilst it is likely that development will go beyond 2033, the proportion of development that can come forward before 2033 will be key to any decision the Council may make on the location to be included in the Local Plan. This HELAA is a point in time assessment and should additional information come forward, it will be considered when carrying out the next review.

Additional Land Relative to a Broad Location

11.39 On reflection of the Councils preferred spatial strategy and the level of developer interest regarding broad locations, the boundaries of sites can alter and grow in response to information gathered by land promoters. The availability of land for the broad locations has been determined based on the information available to officers in late 2017.

11.40 Since that time and before the publication of the HELAA 2017/18, land promoters have made the Council aware of additional areas of land that they could consider if a specific location were to be identified through the Local Plan. In order to be transparent about land identified to the Council Appendix 8 of this HELAA includes our most up to date understanding of land within a broad location and also any additional individual sites that have been submitted to us since the closing date for individual site submissions.

Cross-Boundary Location Availability

11.41 Where a location straddles a boundary, the availability assessment must reflect upon any known position taken by a neighbouring authority in their own assessments and planning strategies, such as a Local Plan. Therefore, if the Council, through its liaison with its neighbours, is formally advised that the location is not reflective of the plans of the other authority, it may not be considered available for development through the HELAA process. In the same way that a lack of agreement between landowners can prevent a site from being considered available, the reluctance of a neighbouring authority to support a cross-boundary scheme effectively suggests that the land needed will not be made available for development at the strategic level.

11.42 In carrying out this HELAA, the Council has considered the most up to date position of its neighbours and used planning judgement to determine what effect, if any, this has on considering a location available for development.

Stage 4 - Assessing the achievability of sites

- 11.43 Paragraph 21²⁵ of the PPG explains 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.*” It continues by explaining that it “... *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.*”
- 11.44 The planning and development industry accepts that the larger a development, the more established financial viability becomes. Land capture and profit margins are easily secured by housebuilders on large-scale developments and the available funding for infrastructure and services are a significant opportunity and benefit to such developments. However, achievability will need to consider any significant infrastructure that may be needed or other constraints that could have an effect on the viability.
- 11.45 This HELAA does not look at detailed proposals for development only a broad location within which the principle of development could be established. The achievability of each location is assumed to exist due to the scale of development that could take place, but will be a matter for the wider Local Plan to explore and assess in detail when viability testing can be informed by the scale of development and on reflection of the level of infrastructure provision that would be needed to support that development.
- 11.46 Further, discussions with developers and master planning will be a fundamental factor in the Local Plan being able to establish deliverability. This information will be fed back into subsequent HELAA reviews as more information becomes available.
- 11.47 The viability of the Local Plan as a whole will be assessed and reported upon at the Regulation 19 stage. Such work will play a key role in demonstrating that the Local Plan can be achieved.

Site Capacity

- 11.48 Calculating the approximate potential capacity of a site is a key aspect of the HELAA. This allows the Council to understand the development potential of each site and location. However, when assessing a broad location, development capacity can only be indicative pending the gathering of further information gained through detailed development proposals and master planning. For the sake of this HELAA, land promoter information has been

²⁵ Reference ID 3-021-20140306

used to inform the understanding of site capacity and amount of developable land and is only altered where the Council disputes land promoter information. This information will be subject to change and reflected on through subsequent HELAA reviews, where needed.

- 11.49 Where a location straddles a district boundary, the cumulative figure for the entire site is used which is considered more representative of what each site could deliver.

12 Future Updates

- 12.1 The HELAA is an iterative process; any future reviews will look at additional information available for the Council to consider, including additional technical information. Further, land can be submitted to the HELAA process at any time, as such future reviews may also include the assessment of new broad locations. As such, **conclusions on the suitability, availability and achievability of sites can change.**

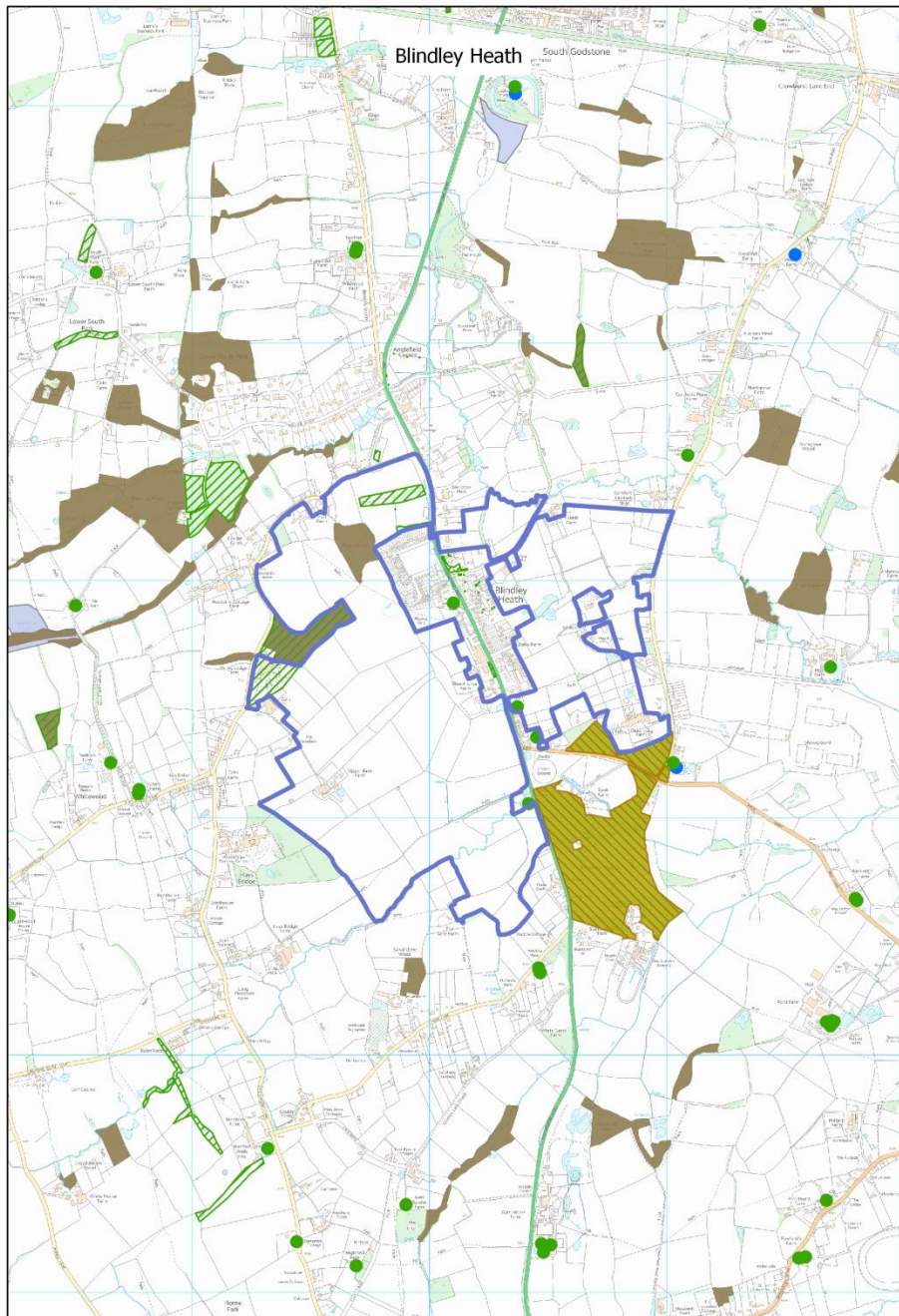
13 Suitable and Available Broad Locations

- 13.1 This section of HELAA (Part 2) assesses the sites that have been found to be suitable as a broad location at this point in time.
- 13.2 The proformas set out the geographical information of the location, how each meets the suitability tests as detailed earlier and also highlights additional and relevant information relating to constraints etc. The availability and potential timescales for delivery are also commented upon using information drawn from material provided by land promoters, the Council's evidence and professional judgement.
- 13.3 The maps presented show not only the broad location for assessment, in the form of a purple circle, but also any sites which fall within the broad location. The site boundary shown within the broad location circle is the boundary of the most up to date land availability that the Council is aware of.
- 13.4 Maps also contain some information on the constraints that exist in the vicinity of each broad location, to aid in the visualisation of nearby issues.
- 13.5 For the purposes of clarity, should the Council select any of these locations for development, the boundaries of the land to be developed would be determined separately through the Local Development Plan process and may be different to the land that has been submitted. For example, the Council may determine to use only part of a site submitted, none at all or a collaboration of other land.

- 13.6 At the bottom of each proforma is an overall suitability checklist. This provides a very concise summary from the landscape study and the SWOT to give an overall outcome of suitability.
- 13.7 Each of the broad locations below also highlights any significant obstacles or constraints that may hinder or prevent their delivery. However these are not currently utilised to find a location unsuitable, given that further work needs to be done through the Local Plan and could be overcome.

Blindley Heath

Predominant HELAA references ²⁶ within the location	BHE 007, BHE 013, BHE 017, BHE 010, BHE 002, BHE 015
Ward	Godstone
Parish	Godstone
Site Area	208ha
Current land use	Agricultural



²⁶ Reflecting the larger sites within the broad location and those upon which the delivery of the location would be reliant on coming forward.

Constraints

Listed Buildings

-  Grade II listed building
-  Grade II* listed building

-  Conservation Areas
-  Tree Preservation Orders
-  Ancient Woodland
-  Local Nature Reserve
-  Site of Special Scientific Interest (SSSI)
-  Site of Nature Conservation Interest (SNCI)

Information

Location

The broad location is situated towards the central south of the District and surrounds the existing rural settlement of Blindley Heath. The broad location is generally rural and is dissected by the A22 Eastbourne Road from north to south.

Physical description of the site

The location is predominantly arable farmland, which is relatively flat and made of a number of parcels of land, bounded by hedgerows and occasional tree belts.

Character of the area

The settlement of Blindley Heath is at the centre of the broad location, with approximately 1,100 residents. There is a modest amount of development of a linear style along the A22. There is a small commercial area in the middle of the village. Blindley Heath is identified as a Tier 3, rural settlement in the Council's Settlement Hierarchy, 2015 and 2018 update.

Relevant planning history

There is no relevant planning history.

Summary of land designations

- Green Belt
- Greenfield land
- Low Weald Farmland
- Gatwick Safeguarding Zone
- Flood Zone 2 and 3
- Tree Preservation Order
- Ancient Woodland
- Site of Special Scientific Interest
- Site of Nature Conservation Interest
- Common and village greens
- Biodiversity Opportunity Area
- Local Nature Reserve
- Grade 3 (good to moderate) and 4 (poor) agricultural land quality

Suitability

Physical limitations and considerations

Contamination, pollution and any hazardous risk

The broad location contains an area of land that has moderate risk of land contamination, but could be dealt with by condition. In terms of noise pollution, an acoustic report would be needed for dwellings within 10m of the A22. There are a number of historic landfill sites within and adjacent to the broad location, including a limited waste disposal and historic landfill site to its east. Air quality assessments would need to be undertaken to understand the effects of the current A22 and the impact of any development.

Agricultural land classification

The land is mainly in grade 3 agricultural land, with a small part to the south and north in grade 4.

Flood risk

The southern part of the broad location is within Flood Zones 2 and 3 (to the south and east). The risk of surface water flooding is limited, with an area at high risk running to the north through the centre of the area.

Access

Access is possible from the A22 and surrounding rural road network although the capacity of the A22 and the potential knock on effects to the wider A22 and M25 Junction 6 needs to be more fully understood. Mitigation to the A22 and M25 Junction would likely be needed and transport modelling would need to investigate this fully.

No direct rail access is located in Blindley Heath. Godstone (at South Godstone) and Lingfield stations are the closest rail access.

Environmental limitations and considerations

Landscape

The area to the west of Blindley Heath has been assessed as a location with a high potential to accommodate future large scale development. Settlement expansion could be accommodated within the well-defined landscape parameters where the existing landscape structure could be developed to define new robust boundaries to the area of new settlement. The wider rural setting to Blindley Heath would largely be unaffected by the potential development and there should not be the potential for coalescence with any surrounding settlements. The landscape assessment undertaken by the Council did not look in detail at land to the east of the settlement, although if further development were proposed between the A22 and Tandridge Lane it could provide additional capacity without undue visual impact on the wider landscape to the east of Blindley Heath.

Land in this area falls within the Low Weald Farmland.

Ecology

The area is considered to be **Majority Ecologically Suitable** for development, but in areas around retained woodlands and in the more closely-networked hedgerows, sensitive design of roads and residential parcels would be required. The Ray Brook corridor and

floodplain is undevelopable, but as it is currently of rather low ecological interest, a large-scale holistically-planned development offers the opportunity to restore natural environmental interests.

Heritage and conservation

There is a grade II* listed building to the south west of the location, as well as a number of other listed buildings scattered around the area.

Sites of Special Scientific Interest

Surface runoff from significant development in the broad location, is likely to pass through the SSSI to the south of the broad location and could be significant. The inclusion of SuDS and appropriate management of runoff could limit pollution risk and potentially improve the situation relative to rural runoff

Nature

Blindley Heath SSSI is to the south east, both within and adjacent to the broad location (to the south/south east). Axeland Croft Shaw, Bannister Shaw and Gayhouse Furzes SNCIs are to the west of the broad location. Blue Anchor Wood, which is an SNCI and an area of Ancient Woodland, is situated adjacent to the west of the broad location whilst the Byers Wood area of Ancient Woodland is within the northern section of the location. There are additional areas of Ancient Woodland to the north west of the broad location.

There are two area TPOs in the broad location and one woodland TPO adjacent to the west and one in the broad location area. The broad location is not within or adjacent to an AONB or candidate AONB. Potential SNCIs are scattered around the area, with greatest concentrations to the northwest. Blindley Heath Local Nature Reserve is situated to the south east, and is also designated as a common/village green.

Green infrastructure

The Eden Biodiversity Opportunity Area covers a large swathe of land to the south of the broad location. These are regionally identified priority areas of opportunity for restoration and creation of Priority Habitats and should be considered as areas of opportunity, not constraint.

Accordance with the Council's Preferred Strategy

The Council adopted the Preferred Strategy for the Local Plan in March 2017. It is the Council's view that by preparing a Local Plan which delivers development through a combination of a new Garden Community and some limited development of our urban and semi-rural areas can mean that there is the ability to provide much needed homes and services for people, whilst protecting the distinctive nature of the area.

General edge of settlement development that does not form part of a Garden Community would not be supported by the preferred spatial strategy of the Local Plan. Blindley Heath is not considered to be acceptably sustainable enough in its current state, to support development which does not generate a critical mass sufficient to delivering wider infrastructure improvements.

Availability

Land to the west of the existing settlement is considered to be available for development, with the majority of the land being under one ownership and promotional option. The availability of land to the east however, is not as well established and whilst information

made available to the Council suggests more of the land to the east has been secured since the HELAA: Broad Location 2017 assessment, there are still a number of questions surrounding some of the parcels of land, with some being categorically opposed by landowners. That said, given that the HELAA consideration of availability relies on an understanding that the majority of the land is available, this broad location can be considered as such. The amount of land available would meet the minimum parameters to be considered as a broad location within the HELAA, but it is for the Local Plan to determine whether there is sufficient land for it to meet the expectations and delivery of the spatial strategy.

Blindley Heath falls entirely within the Tandridge administrative area and the plans and strategies of neighbouring authorities have no bearing on this broad location being considered available.

Consideration of possible uses

The site has been submitted to the Council for consideration as a housing-led, mixed use development, including residential dwellings, community infrastructure and other associated infrastructure.

Anticipated commencement year

6-10 years from the adoption of the Local Plan.

Anticipated build out rate

150-300 dwellings per annum

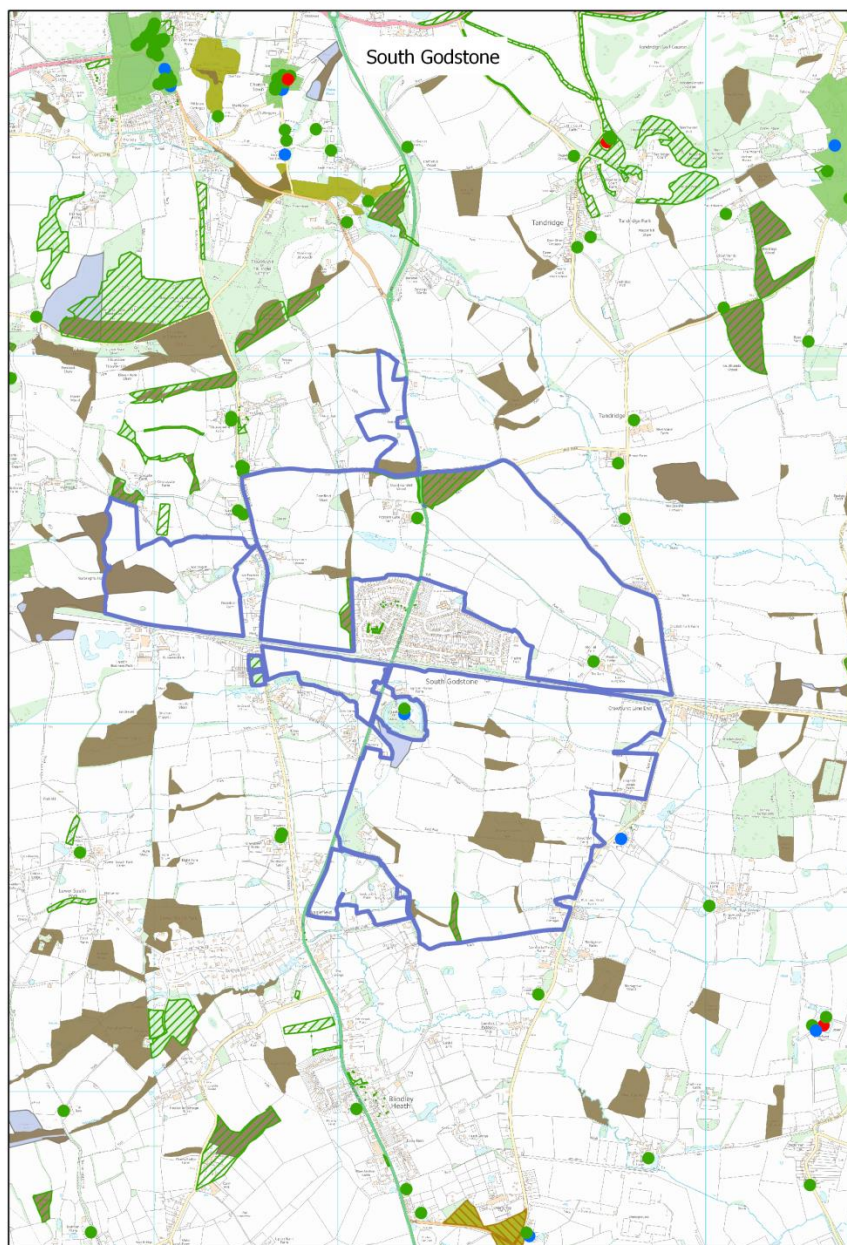
Overall conclusion for HELAA 2017/18

Landscape outcome	High Potential to the west, with some potential to the east, but more landscape evidence would be needed to better understand this.
SWOT Analysis outcome	Potential to be explored further
Duty to Cooperate outcome	Discussions have and continue to take place across administrative boundaries and on strategic matters. The entirety of Blindley Heath resides well within Tandridge District boundaries.

Suitable and Available

South Godstone




Predominant HELAA references ²⁷ within the location	South Godstone:SGOD 005, SGOD 009, SGOD 012, SGOD 014, SGOD 022, SGOD 006, SGOD 010, SGOD 013, SGOD 015, SGOD 016, SGOD 018, SGOD 019, SGOD 020, SGOD 021,
Ward	Godstone and Oxted North & Tandridge
Parish	Godstone and Tandridge
Site Area	420 ha
Current land use	Agricultural









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²⁷ Reflecting the larger sites within the broad location and those upon which the delivery of the location would be reliant on coming forward.

Constraints

-  Grade I listed building
-  Grade II listed building
-  Grade II* listed building

-  Conservation Areas
-  Tree Preservation Orders
-  Ancient Woodland
-  Local Nature Reserve
-  Site of Special Scientific Interest (SSSI)
-  Site of Nature Conservation Interest (SNCI)

Information

Location

The broad location is in the centre of the District and surrounds the existing rural settlement of South Godstone. The A22 (Eastbourne Road) dissects the broad location from north to south. The railway line provides a general demarcation of promotional interest between land to the north and land to the south. South Godstone is identified as a Tier 3, rural settlement in the Council's Settlement Hierarchy (2015).

Physical description of the site

The broad location is predominantly arable farming land with varied topography. It is made of a number of parcels of land, bounded by hedgerows and occasional tree belts.

Character of the area

South Godstone is a rural settlement within the District, with a railway line forming the current southern boundary. The far northern area is more sensitive in landscape terms and would need to be considered suitable if any development were to take place. Residents have access to the train station with access to Redhill, Edenbridge and Tonbridge and with connections to London, Guildford and Reading.

Relevant planning history

There is no relevant planning history.

Agricultural land classification

The broad location is mostly formed of grade 3 agricultural land, with areas to the north east containing land of grade 4 agricultural value.

Summary of land designations

- Green Belt
- Greenfield land
- Varying risk of contamination, with some areas having high and moderate risk
- Grade 3 (good to moderate) and 4 (poor) agricultural land quality
- Ancient Monument
- Area of High Archaeological Potential
- Biodiversity Opportunity Area
- Ancient Woodland
- Flood Zones 1, 2 and 3
- Gatwick Safeguarding Zone
- Historic landfill
- Listed buildings
- Site of Special Scientific Interest
- Site of Nature Conservation Interest
- Special Areas of Conservation buffer

- TPO
- High surface water flooding risk
- Waste disposal and land minerals site

Suitability

Physical limitations and considerations

Contamination, pollution and any hazardous risk

The broad location contains areas at varying of risk of contamination. Some parts of the broad location have moderate risk of contamination, which could be dealt with by condition. Parts of the broad location are at high risk of contamination and would require a risk assessment and site investigation. Other parts have an elevated risk for which a desk study and preliminary risk assessment would be needed.

There are historic landfill sites within close proximity of the site. There is also an area of land to the north that is identified as an area for waste disposal and minerals.

Air quality assessments would need to be undertaken to understand the effects of the current A22 and the impact of any development.

Agricultural land classification

The broad location is mainly in grade 3 agricultural land, with a small part to the south west in grade 4.

Flood risk

There is a channel of land which is in Flood Zone 3 which runs from north west to south east. There are parts of the broad location to the west which are at high risk of surface water flooding. There are sporadic and more common areas at low risk of surface water flooding.

Access

Access is possible from the A22 and surrounding rural road network although the capacity of the A22 and the potential knock on effects to the wider A22 and M25 Junction 6 needs to be more fully understood. Mitigation to the A22 and M25

Junction would likely be needed and transport modelling would need to investigate this fully.

The village of South Godstone contains direct access to the railway network.

Environmental limitations and considerations

Landscape

The area has been assessed as a location with medium potential to accommodate future development. The area could provide a potential settlement extension area contained by well-defined landscape boundary. Any development would need to be mindful of the sensitive landscape to the north and the ridge lines and woodlands to the south.

The land has been identified as being within the Low Weald Farmland.

Ecology

The area is regarded as **Majority Ecologically Suitable**. Most is of relatively low ecological value, but there are pockets of locally important and Ancient Woodland which impose constraints on access, and will require protection and buffering in the context of major new residential development.

The Ancient Woodland corridor in the north west quadrant running north from the railway line as far as Harts Lane imposes a constraint on east west road access and drainage infrastructure, including access from the existing settlement of South Godstone. However, this could be overcome if access can be taken from Tilburstow Hill Road and Harts Lane.

Heritage and conservation

There are listed buildings to the west of the broad location, along Tilburstow Hill Road. Lagham Manor is a scheduled monument and Grade II* listed building in the centre of the broad location, which is a medieval moated site. There is a ring of Area of High Archaeological Potential within the broad location at Park Pale, as well as a ring around Lagham Manor.

Nature

There are potential SNCIs to the south of the broad location at Bradford Wood and to the west of The Mount on the A22. An additional potential SNCI is to the west at Birchen Coppice. There are a number of SNCIs near the broad location, including Piper's Wood, Furze Wood and Cloverhouse Meadow.

There are a number of areas of Ancient Woodland at the broad location, including Bradford Wood, Paygate Wood, Steadmanshill Wood and an area to the west of Posterngate Farm.

There is a woodland designation of Tree Preservation Order to the southern part of the broad location, east of Oaktree Farm. There are a number of other Tree Preservation Orders within and nearby to the broad location. The area is not within or adjacent to an AONB or candidate AONB.

Green infrastructure

The Eden Biodiversity Opportunity Area runs through parts of the broad location, from north to south, along the A22. These are regionally identified priority areas of opportunity for restoration and creation of Priority Habitats and should be considered as areas of opportunity, not constraint.

Accordance with the Council's Preferred Strategy

The Council adopted the Preferred Strategy for the Local Plan in March 2017. It is the Council's view that by preparing a Local Plan which delivers development through a combination of a new Garden Community and some limited development of our urban and semi-rural areas can mean that there is the ability to provide much needed homes and services for people, whilst protecting the distinctive nature of the area.

General edge of settlement development that does not form part of a Garden Community would not be supported by the preferred spatial strategy of the Local Plan. South Godstone is not considered to be acceptably sustainable enough in its current state, to support development which does not generate a critical mass sufficient to delivering wider infrastructure improvements.

Availability

The majority of land parcels have been submitted to the Council for consideration through the HELAA process. Whilst the area, both north and south, has a number of individual landownerships, a willingness to see development is shown and there are multiple legal agreements in place with land promoters across the broad location. The Council is aware that a number of plots of land on the east of the area, south of the railway line, were purchased through a 'land-scam' a number of years ago and would need resolving if that area of land were necessary to any development. A number of the plot owners have been in touch with the Council on this matter and have advised that their land is available. Should this location be developed consideration of these plots would need to be explored further. The majority of the land at South Godstone is considered to be available. The amount of land available would meet the minimum parameters to be considered as a broad location within the HELAA, but it is for the Local Plan to determine whether there is sufficient land for it to meet the expectations and delivery of the spatial strategy.

South Godstone falls entirely within the Tandridge administrative area and the plans and strategies of neighbouring authorities have no bearing on this broad location being considered available.

Consideration of possible uses

Land in this location has been submitted to the Council for consideration by two land promoters alongside a number of individual landowners. The site has been submitted to the Council for consideration as housing led, mixed use development, including residential dwellings, community infrastructure and other associated infrastructure.

Anticipated commencement year

6-10 years from the adoption of the Local Plan

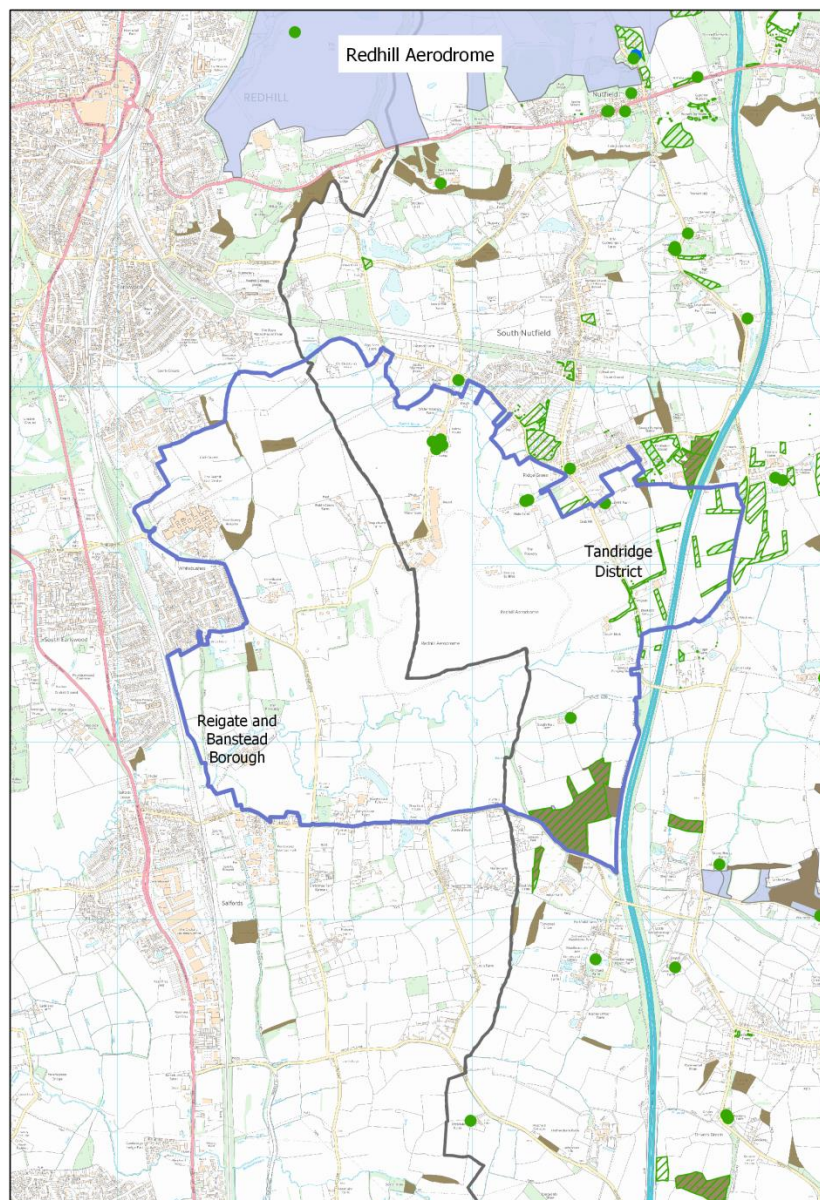
Anticipated build out rate

150-300 dwellings per annum

Overall conclusion for HELAA 2017/18	
Landscape outcome	Medium potential to accommodate future development with some sensitivity to the far north.
SWOT Analysis outcome	Potential to be explored further
Duty to Cooperate	Discussions have and continue to take place across administrative boundaries and on strategic matters. The entirety of South Godstone resides well within Tandridge District boundaries.
Suitable and Available	


Redhill Aerodrome



Predominant HELAA references ²⁸ within the location	NUT 017
Ward	Bletchingley and Nutfield (within TDC) and Earlswood & Whitebushes and Salfords & Sidlow (RBBC)
Parish	Nutfield (TDC) and Salfords & Sidlow (RBBC)
Site Area	623ha (325ha in RBBC and 298 ha in TDC)
Current land use	Operational aerodrome and surrounding agricultural farmland.



²⁸ Reflecting the larger sites within the broad location and those upon which the delivery of the location would be reliant on coming forward.

Constraints

-  Grade I listed building
-  Grade II listed building
-  Grade II* listed building

-  Conservation Areas
-  Tree Preservation Orders
-  Ancient Woodland
-  Local Nature Reserve
-  Site of Special Scientific Interest (SSSI)
-  Site of Nature Conservation Interest (SNCI)

Information

Location

The broad location is at the western edge of the District, crossing into the administrative area of Reigate and Banstead Borough Council. The surrounding areas are open to the south and east, with sparse development to the north and west. There are a number of settlements that are in close proximity to the broad location, most prominently South Nutfield in Tandridge District and Whitebushes and Salfords in Reigate and Banstead.

Physical description of the site

The broad location contains the currently functioning Redhill Aerodrome and employment area. A number of agricultural fields also exist within the boundary. The M23 largely forms the eastern boundary, with existing development including East Surrey Hospital, Earlswood, Salfords and Whitebushes in Reigate and Banstead forming the western boundary. The Salford Stream runs east to west through the southern part of the broad location. The location itself is relatively flat, although largely sits within a bowl shape with the surrounding landscape having views down into it. There is currently no strategic road access to the location, with a reliance on the rural road network. The closest strategic roads are the A25 and A23. Although the M23 runs to the west of the broad location, there is no access from it.

Character of the area

The broad location is predominantly rural and open. Whilst there is existing sporadic residential development across the area, the main built form is concentrated on the employment units which are mainly aviation related and the rest of land in the broad location is undeveloped.

Relevant planning history

There have been a number of recent planning applications in relation to the existing commercial uses. Of note, 2012/1027 was an application for the construction of a hard runway to replace the existing grass runway. This application was considered through appeal and by the High Court but was dismissed as not justifying the very

special circumstances necessary to build within the Green Belt. As such, whilst aerodromes are traditionally considered brownfield development, this does not apply to Redhill Aerodrome which has retained a grass runway and the appeal decisions relating to the above application confirm this. The brownfield element of the wider location is primarily confined to the existing employment buildings associated with the aerodrome.

Summary of land designations

- Green Belt
- Greenfield land
- Grade 3 (good to moderate) and 4 (poor) agricultural land quality
- Areas at high and elevated risk of contamination
- Ancient Woodland
- Biodiversity Opportunity Area
- Flood Zones 2 and 3
- Gatwick Safeguarding Zone
- Listed buildings
- Site of Nature Conservation Interest
- Special Areas of Conservation
- Tree Preservation Order
- Areas at high risk of surface water flooding

Suitability

Physical limitations and considerations

Contamination, pollution and any hazardous risk

The broad location contains areas of both high risk of contamination and elevated risk of contamination. The areas at high risk would require a risk assessment and site investigation. The area at elevated risk would require a desk based study and a preliminary risk assessment. An acoustic survey would also be needed for this site.

Air quality assessments would need to be undertaken to understand the effects of the current M23 and the impact of any development.

Agricultural land classification

The broad location is mostly formed of grade 4 agricultural land, with areas to the east containing land of grade 3 agricultural value.

Flood risk

There are a number of areas at high risk of surface water flooding throughout the broad location, with the main area of land at risk to the east, within the TDC boundary. Flood Zones 2 and 3 cover a fairly large part of the area that falls within the TDC boundary, extending then along Salfords Stream. However, it is considered that flooding may be exacerbated by the operations of the aerodrome which channel surface water run off through narrow culverts and may be able to be mitigated by large scale development.

Access

Current access to the area is reliant on a rural road network and there is no current

direct access to strategic road network with the A23 located to the west and A25 to the north but only accessed via rural feeder roads. It is accepted that development in this location could only be facilitated by a new junction from the M23 but the delivery of this is currently uncertain and would need the assurances of Highways England and Department for Transport. Neither the governments Road Investment Strategy 1 (RIS1), nor RIS2 make provision for a new junction off the M23 at this location before 2025.

Environmental limitations and considerations

Landscape

The area has been assessed as a location with medium potential to accommodate future development. New development would be prominent from the north, particularly from the Greensand Ridge and the candidate area for the AONB and the Greensand Way, but is otherwise well-contained in the wider landscape.

As part of the Landscape Character Assessment 2015, the land has been identified as being within the Low Weald Farmland.

Ecology

The site shown as NUT 017 is considered to be **Ecologically Suitable** for development. It is currently of relatively low ecological interest. The Redhill Brook and Salfords Stream corridors are undevelopable, but as they are currently of rather low ecological interest, a large-scale holistically-planned development offers the opportunity to restore natural environmental interests.

The wider area around NUT 017 is considered to be free from high-level ecological constraint. However, there are Biodiversity Opportunity Areas in the vicinity, particularly within the Reigate and Banstead area.

Heritage and conservation

There are listed buildings scattered within the broad location, including at Hamme House, South Hale Farm and Crab Hill Farm.

Nature

Furzefield Wood SNCI is to the south of the broad location, with Outwood Common SNCI being near the broad location to the south west. Thepps Shaw potential SNCI is to the north east of the site on Kings Cross Lane and a further two potential SNCIs are to the south west of the broad location. Furzefield Wood is also an area of Ancient Woodland to the south of the broad location. Other areas of Ancient Woodland are scattered in the Reigate and Banstead portion of the broad location and in close vicinity. There is a woodland TPO, an area TPO and a high number of individual TPOs, in the location. The location is not within the AONB although an area of candidate AONB is to the north.

Green infrastructure

The River Mole Biodiversity Opportunity Area is in the north eastern part of the broad location. This is a regionally identified priority area of opportunity for restoration and creation of Priority Habitats and should be considered as areas of opportunity, not constraint.

Accordance with the Council's Preferred Strategy

The Council adopted the Preferred Strategy for the Local Plan in March 2017. It is the Council's view that by preparing a Local Plan which delivers development through a combination of a new Garden Community and some limited development of our urban and semi-rural areas can mean that there is the ability to provide much needed homes and services for people, whilst protecting the distinctive nature of the area.

Whilst this broad location is primarily segregated from any existing settlement, South Nutfield is located in close proximity. However, general edge of settlement development that does not form part of a Garden Community would not be supported by the preferred spatial strategy of the Local Plan. South Nutfield is not considered to be acceptably sustainable enough in its current state, to support development which does not generate a critical mass sufficient to delivering wider infrastructure improvements.

Availability

The land is available for development, with the majority of the land being under one ownership and promotional option.

The area of land within Reigate and Banstead administrative area has been safeguarded for future development through their Development Management Plan, which was recently submitted to the Planning Inspectorate for examination. As such, if development were to be allocated here, the strategies and plans of the neighbouring authority would not prevent the broad location from being considered available.

Consideration of possible uses

The site has been submitted to the Council and the neighbouring Reigate and Banstead Borough Council for consideration as a housing led, mixed use development, including residential dwellings, community infrastructure and other associated infrastructure including a new junction off the M23 with associated link road.

Anticipated commencement year

15+ years from the adoption of the Local Plan

Anticipated build out rate

150-300 dwellings per annum

Overall conclusion for HELAA 2017/18

Landscape outcome	Medium potential to accommodate future development
SWOT Analysis outcome	Potential to be explored further
Duty to Cooperate outcome	This location crosses the strategic and administrative boundaries with Reigate and Banstead Borough Council. Discussions and liaison continue to take place with Reigate and Banstead who have safeguarded the land at Redhill Aerodrome within their area, for potential

	<p>future development. As such support for this location is shown by the neighbouring authority.</p> <p>Ongoing discussions with infrastructure providers, including Surrey Highways and Highways England, have been carried out primarily to discuss the possibility of an M23 junction and link road.</p>
Suitable and Available	

14 Unsuitable and/or Unavailable

This section highlights those locations that have been discounted from the process due to their unsuitability and/or unavailability:

Location	Location Source ²⁹	Suitability Assessment ³⁰	Availability Assessment
Land west of Edenbridge	HELAA Submission	SUITABLE	UNAVAILABLE: Sevenoaks DC who would be integral to the delivery of this location, do not support it and have formally stated that they will not be pursuing this as an option in their Local Plan.
Land at Alderstead and Tollsworth Farm, Chaldon	HELAA Submission	UNSUITABLE: Landscape impact.	AVAILABLE: Significant land parcel submitted by landowner. Land in single land ownership.
North of Copthorne	SWOT	UNSUITABLE: Landscape impact.	PARTIALLY AVAILABLE: A number of large sites submitted by multiple landowners.
Hobbs Industrial Estate	SWOT	UNSUITABLE: Landscape impact.	UNAVAILABLE: Whilst the employment area was initially submitted by the land owner for consideration as a mixed use development. Recent discussions with land agents suggest it is being considered for employment

²⁹ Information relating to the Council's SWOT process can be found in the Spatial Approaches Topic Paper of 2015, 2016 and 2017. These are published on the Council's website.

³⁰ For more information relating to the landscape assessment, please see the Council's website.

purposes only. Surrounding land did not form part of the HELAA process.

Horne	SWOT	UNSUITABLE: Landscape impact.	UNAVAILABLE: Land in the area has not been submitted as part of the HELAA process.
Lambs Business Park	SWOT	UNSUITABLE: Landscape impact.	UNAVAILABLE: Whilst some land in this area has been submitted through the HELAA, land is only available for employment expansion. Land to the east of the location is considered under the South Godstone broad location.
Lingfield	SWOT	UNSUITABLE: Landscape impact.	PARTIALLY AVAILABLE: A number of land parcels were submitted through the HELAA process.

