

Tandridge District Council

Housing & Economic Land Availability Assessment – Interim Report (2021)

(September 2021)

Contents

1. Introduction	4
Background	4
What is included in this Report?.....	4
Individual Sites	5
2. Policy Context	6
National Policy and Guidance	6
Local Policies	7
Individual Sites	8
3. Methodology.....	8
Call for Sites	8
4. Potential Housing Sites	8
New and Amended Sites.....	8
Table 1: New sites	8
Table 2: Amended sites.....	8
5. Notional Housing Trajectory	9
Background	9
Indicative Housing Trajectory	9
Table 3: Council's notional housing trajectory.....	9
Table 4: Sites no longer suitable, available and achievable.....	9
6. Conclusions	9
Introduction	9
Potential Housing Sites	9
Windfall Housing Delivery.....	10
Indicative Housing Trajectory	10
Future Updates	11
Appendix 1: Deliverable and Developable Sites	12
New Sites.....	13
Amended Sites	16
Appendix 2: Unsuitable and Unavailable Sites	18
New Sites.....	19
New Sites.....	21
Amended sites	26
Appendix 3: Additional Sites for consideration in the next HELAA review.....	29

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 Interim 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 Interim HELAA report (2021) should be viewed as an addition to the HELAA 2017/18, which was split into two parts to cover individual sites and broad locations submitted prior to 31 December 2017. It should also be viewed in addition to the HELAA Interim Reports for 2019 and the HELAA Interim Report 2020, which provided an update for sites submitted between 31 December 2017 and 31 January 2020, all of which are available to view on the Council's website.
- 1.6 All references to the National Planning Policy Framework (NPPF) in this document are to the NPPF 2021.

What is included in this Report?

- 1.7 This HELAA reflects the information known to be correct to the Council at the time of writing. No site submitted after 30 April 2021 has been assessed. Such sites will be considered and assessed in future iterations of the HELAA.
- 1.8 The Council adopted a preferred strategy in March 2017, which is to be pursued in preparing Our Local Plan 2033, currently undergoing public examination with the Planning Inspectorate. The strategy includes the need to

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

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 elements of the strategy require differing methods for the identification and assessment of sites. There have been no changes to the broad locations since the previous interim report from January 2019 and therefore this report will focus only on the individual sites.

Individual Sites

- 1.9 The individual sites, covered in Sections 3-6 of this Interim HELAA 2021 should be viewed in addition to the 2017/18 HELAA Report, HELAA Interim Report 2019 and HELAA Interim Report 2020. It assesses the development potential of new sites submitted to the Council through the HELAA process in the period from 31 January 2020 until 30 April 2021. The report also includes amendments to existing HELAA sites following notifications from landowners/agents. 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; and
 - An indicative trajectory of development that could come forward.
- 1.10 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.

2. Policy Context

National Policy and Guidance

- 2.1 The NPPF (2021) and the accompanying Planning Practice Guidance (PPG) identifies that the Government wants to use the planning system to significantly boost the supply of housing² and support sustainable economic growth³. 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 availability assessment which enables realistic assumptions about the availability, suitability and likely economic viability of land to meet identified development needs for the duration of the plan period is set out in paragraph 68 of the NPPF (2021). 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;
 - Assess the likelihood of development coming forward (availability and achievability); and
 - Assess whether the site and broad locations are deliverable, developable or non-developable.
- 2.4 This advice has determined the Tandridge HELAA methodology (2015) and undertaking the site assessments. It should however be noted that the NPPF 2019 and subsequent NPPF 2021 'Glossary' updates the definition for 'deliverable' sites, which are sites which 'should be available now, offer a suitable location for development, and be achievable with a realistic prospect that housing will be delivered on the site within five years'. The NPPF 2019, and subsequently 2021, definition now also states that:
- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example, because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans);
 - b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable

² NPPF, Paragraph 60

³ NPPF, Paragraph 81

where there is clear evidence that housing completions will begin on site within five years.

- 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.

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 has prepared a Local Plan which is currently undergoing public examination. Once adopted, the Local Plan: 2033 will replace the Core Strategy. 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.

Individual Sites

3. Methodology

3.1 This interim report follows the HELAA Methodology (2015).

Call for Sites

3.2 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. The deadline for site submissions for this Interim Report was 30 April 2021. Any additional individual sites received after this period and up to the point of completing the report, are listed in Appendix 3 of the document and will be considered through the next review of the HELAA.

4. Potential Housing Sites

New and Amended Sites

4.1 There were a total of 13 new sites submitted during the period of consideration for this Interim HELAA. Two of these have been assessed as being deliverable and developable and are outlined in Table 1 below. One site submitted for Interlet House, Chapel Road, Smallfield is considered to be deliverable but has been amalgamated with existing deliverable site SMA 015 and is set out in Table 2 as an amendment to this site. All other sites are detailed in Appendix 2 of this report, having been considered either unsuitable or unavailable.

4.2 In addition to the new sites this report also provides updates to sites which were included in the HELAA 2017/18. Appendix 2 therefore also includes three amended sites where the site remains unconnected to the boundaries of a sustainable settlement. As such, the original conclusions of these sites remain unchanged and maintain their status as unsuitable.

Table 1: New sites

CAT 091	1 Coulsdon Road, Caterham
CAT 093	Land to the rear of Grove House, 140 Salmons Lane, Whyteleafe

Table 2: Amended sites

SMA 015	Chapel Road, Smallfield (to include Interlet House)
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4.3 The sites listed in the table above should be viewed in conjunction with Appendices 3 of the HELAA 2017/18, and the Interim HELAA 2019 and Interim HELAA 2020, and only supersede these documents in terms of the amended site listed in Table 2. In all other respects the HELAA 2017/18 and its appendices are considered current, other than the updates outlined in the Interim HELAA 2019 and Interim HELAA 2020.

5. Notional Housing Trajectory

Background

- 5.1 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 being examined. The same assumptions have been made as outlined in Section 6 of the HELAA 2017/18, other than windfall, which has been updated as further outlined below.

Indicative Housing Trajectory

- 5.2 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. Table 3 below updates the trajectory to include the new sites identified through the Interim HELAA 2021 and Table 4 list those sites that have been removed as they are no longer suitable, available and achievable. The windfall calculation has also been updated to reflect the most up-to-date situation as calculated as part of the Council's Annual Monitoring Report (AMR) 2020-2021

Table 3: Council's notional housing trajectory

	2021-2026	2026-2031	2031-2033+
Deliverable Sites	452		
Developable Sites		8,665	13,625
Windfall	165	165	165
Cumulative (5yr)	617	8,830	13,790
Cumulative (total)		23,237	

Table 4: Sites no longer suitable, available and achievable

HELAA Reference	Site Address
CAT 041	Maybrook House, Godstone Road, Caterham
GOD 021	William Way Builders Merchants, 38-42 High Street, Godstone
NUT 003	Land at Kings Cross Lane, South Nutfield

6. Conclusions

Introduction

- 6.1 This section of the report summarises the main findings of the Interim HELAA 2021.

Potential Housing Sites

- 6.2 154 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 452 dwellings.
- 6.3 114 sites were considered to be developable, meaning that they could come forward in 5 or more years' time, between 2026/27 and 2033 and beyond. Collectively, these sites were estimated to be able to deliver 22,742 dwellings.

This figure excludes estimated windfall figures and only includes individual sites identified in the HELAA.

- 6.4 Maps and site assessment information for sites considered to be deliverable and developable can be found in Appendix 1. It should be remembered that the assessment of sites as part of the HELAA process are done in a 'policy off' manner. The assessment of suitability has not been determined outside of other technical assessments that are otherwise utilised to inform sites to be allocated through a Development Plan. Therefore, the sites outlined in Appendix 1 have not been judged in detail against current local planning policies.

Windfall Housing Delivery

- 6.5 This report provides an update to the estimated windfall housing delivery and reflects the most up-to-date situation as calculated in the Council's Authority's Monitoring Report (AMR). The Council's most up-to-date estimate is that it could make an allowance for 33 dwellings per year coming forward on small windfall sites. This calculation is based on an average of the completions on small sites of 1-4 units per year since 2006, excluding those for residential back gardens which the NPPF 2019 is clear should not be included within this figure. Such an allowance is considered appropriate given the strong history of housing delivery on such sites in Tandridge.

Indicative Housing Trajectory

- 6.6 Using the information collected on sites assessed as being deliverable and developable for housing, the Council has produced a notional housing trajectory for the period 2021-2033+. **For the purposes of the trajectory only**, the Council has assumed that all sites assessed as being deliverable would come forward between 2021 and 2026 and all developable sites would come forward from 2026 – 2033+.
- 6.7 The Council note that the cumulative total above significantly exceeds that of the identified housing need set out in the Strategic Housing Market Assessment 2015 of 9,400 units, up to 2033 (or that of the updated 2018 assessment – 7960 units). However, the HELAA considers the development potential of a site only and as set out in the PPG should not be constrained by the need for development, but instead provide an audit of land availability that 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.
- 6.8 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.

6.9 The Local Plan will be the document which determines the local housing delivery target to be set, as well as the locations of development of all types, taking account of the HELAA and the wider evidence base.

Future Updates

6.10 Any further changes to Part 1: Individual Sites and Part 2: Broad Locations, will be revised when the HELAA is next updated as needed.

Appendix 1: Deliverable and Developable Sites

New Sites

HELAA Reference Number	CAT 091
Address	1 Coulsdon Road, Caterham
Site Size (Hectares)	0.09
Approximate Developable Area (Hectares)	0.09
Site Description	The site comprises a car showroom and MOT service garage within the built-up area of Caterham. The rear gardens of residential properties border the site to the east with flatted accommodation to the south.
Suitability	Access would be possible from Coulsdon Road and there are no topographical constraints. The site is considered to be able to accommodate residential development. The land was previously used as a petrol station which could pose potential contamination issues with the site, as such there would be a requirement for a risk assessment and site investigation.
Availability	The site has been submitted on behalf of the landowners and is considered immediately available.
Achievability	The land is considered to have potential contamination issues which could include costs in decontaminating the land however this is not considered to render the site financially unviable at this time.
Status	Deliverable - For the purposes of the HELAA, the site is considered to be deliverable and capable of coming forward within 5 years, should the site be allocated in the Local Plan.
Estimated Site Yield	5

Strategy compliance	The site is in accordance with the Preferred Strategy.
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HELAA Reference Number	CAT 093
Address	Land to the rear of Grove House, 140 Salmons Lane, Whyteleafe



Land to the rear of Grove House 140 Salmons Lane Whyteleafe CR3 0HA

Site Size (Hectares)	1.21
Approximate Developable Area (Hectares)	1.21
Site Description	The site forms the rear garden to Grove House which is adjacent to the built-up area of Whyteleafe. The land is a mown lawn with a row of established trees down the centre. The ground slopes down gently from south to north and bounded by established trees and hedgerows to all sides. Proposals would consist of establishing access onto Whyteleafe Hill which is currently accessed via permission from landowner of Grove House. To the north-east and east of the site is Kenley Aerodrome and the Grade II listed NAAFI building. Land adjacent to this site is within a Conservation Area. The site is directly adjacent to existing HELAA sites CAT 004 and CAT 060.
Suitability	The topography is not considered to prevent development. However the site is bounded by trees and hedgerows on all sides and the presence of trees are noted along the centre of the site. Access would also need to be established via Whyteleafe Hill. Although these factors would not prevent development, they would need to be considered through the development management process.

	The site is considered able to accommodate development although as the site is within the Green Belt, this designation would have to change in order for it to be developed.
Availability	The site has been submitted to the HELAA process on behalf of the landowner and is therefore considered available.
Achievability	No constraints that could render the site financially unviable are identified at this time.
Status	Developable - For the purposes of the HELAA, the site is considered to be developable and capable of coming forward after 5 years, should the site be allocated in the Local Plan.
Estimated Site Yield	30
Strategy compliance	Site is in accordance with the Preferred Strategy.

Amended Sites

HELAA Reference Number	SMA 015
Address	Chapel Road, Smallfield
<p>HELAA: SMA 015</p> <p>© Crown copyright and database rights 2021 OS 100018265</p> <p>Tandrige District Council Chapel Road</p>	
Site Size (Hectares)	0.60
Approximate Developable Area (Hectares)	0.27
Site Description	<p>This is a commercial site within the built up area of Smallfield. The site is accessed from the existing entrance on Chapel Road and is surrounded by residential development. The site is currently a scaffolding yard and contains a number of storage sheds as well as an office building that is believed to be vacant. The boundary of this site has been amended from the HELAA 2016 submission following the inclusion of the occupied office building at Interlet House to the south of the site.</p>
Suitability	<p>The site is locationally suitable and benefits from existing access and suitable topography. The site is within Flood Zone 2 and 3. Though this does not completely rule out development, it would have to be shown through the development management process that mitigation measures could be put in place and that the development of the site would not increase flood risk elsewhere. The site is seen as able to accommodate development should flooding issues be overcome. Therefore, for this reason the estimated yield of the site remains unchanged for the purposes of the HELAA despite the small increase to the overall size of the site.</p>
Availability	<p>The site has been submitted on behalf of the landowner and is considered available.</p>

Achievability	The site would likely need to provide for flood mitigation. At this stage it is not thought that this would impact on the achievability of development on site.
Status	Deliverable - For the purposes of the HELAA, the site is considered to be deliverable and would be capable of coming forward within 5 years, should the site be allocated in the Local Plan.
Estimated Site Yield	15
Strategy compliance	Site is in accordance with the Preferred Strategy.

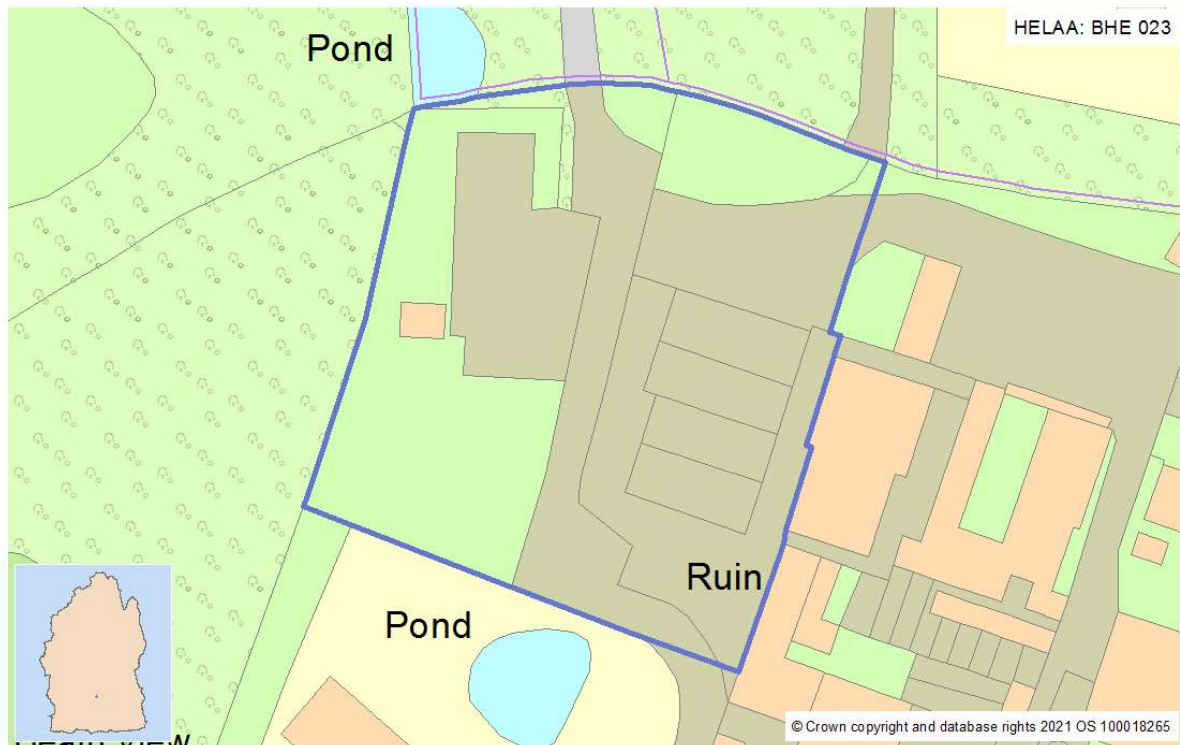
Appendix 2: Unsuitable and Unavailable Sites

New Sites

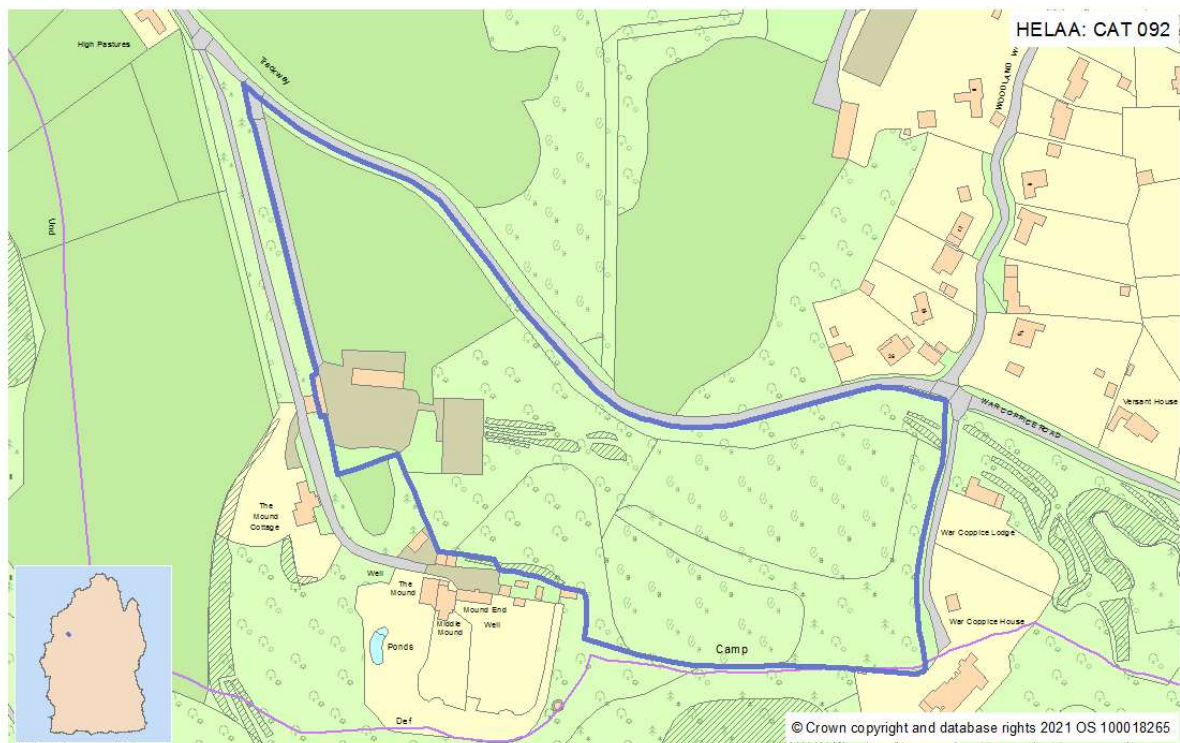
HELAA Reference	Site Name	Status	Reason
BHE023	Nestledown Kennels, Blindley Heath, Lingfield	Unsuitable	The site is unconnected to the boundaries of a sustainable settlement and is therefore not considered suitable.
CAT092	Barnfield, War Coppice Road, Caterham	Unsuitable	The site is unconnected to the boundaries of a sustainable settlement and is therefore not considered suitable.
DPA014	Cromlech, Felcourt Road, East Grinstead	Unsuitable	The site is unconnected to the boundaries of a sustainable settlement and is therefore not considered suitable.
DPA015	Land at Frith Manor Farm	Unsuitable	<p>Whilst the boundary of the site is technically immediately adjacent to a sustainable settlement, part of the link area is designated as Ancient Woodland. In addition, the topography along this boundary, being steeply sloped and wooded, creates a physical separation between the site and the settlement. Paragraph 49 of the Inspector's appeal decision for planning application 2017/888 confirms this, as follows:</p> <p><i>"However, in my view the presence of East Grinstead to the south does not urbanise the existing character of this site. The site is separated from East Grinstead by steep slopes covered in trees and when on the site the fact that there is a densely populated urban area some hundreds of metres to the south is not apparent."</i> (Appeal decision 2017/888, paragraph 49).</p> <p>As such the site is not considered to be suitable location for development at this point in time.</p>
FEL018	Land north east of Woodcock Hill, Eastbourne Road, Felbridge	Unsuitable	The site is unconnected to the boundaries of a sustainable settlement and is therefore not considered suitable.
NUT022	Land north of Kings Cross Lane, Nutfield Farm, Nutfield	Unsuitable	The site is unconnected to the boundaries of a sustainable settlement and is therefore not considered suitable.
WAR042	Plot O and P, Church Lane, Chelsham, Warlingham	Unsuitable	The site is unconnected to the boundaries of a sustainable settlement and is therefore not considered suitable. The site is also not of a size capable of delivering five or more dwellings in this location.

WAR043	Plot D, Church Lane, Chelsham, Warlingham	Unsuitable	The site is unconnected to the boundaries of a sustainable settlement and is therefore not considered suitable. The site is also not of a size capable of delivering five or more dwellings in this location.
WAR044	Forever Green, Chelsham Common Road, Chelsham, Warlingham	Unsuitable	The site is unconnected to the boundaries of a sustainable settlement and is therefore not considered suitable.
WHY012	Joysons Hill, Church Road, Whyteleafe, CR3 0AR	Unsuitable	Whilst the boundary of the site is technically immediately adjacent to a sustainable settlement, the topography of the majority of this site which includes the boundary, being steeply sloped and wooded, creates a physical separation between the developable area of the site and the settlement. As such the site is not considered to be suitable location for development at this point in time.

New Sites



Nestledown Kennels, Blindley Heath

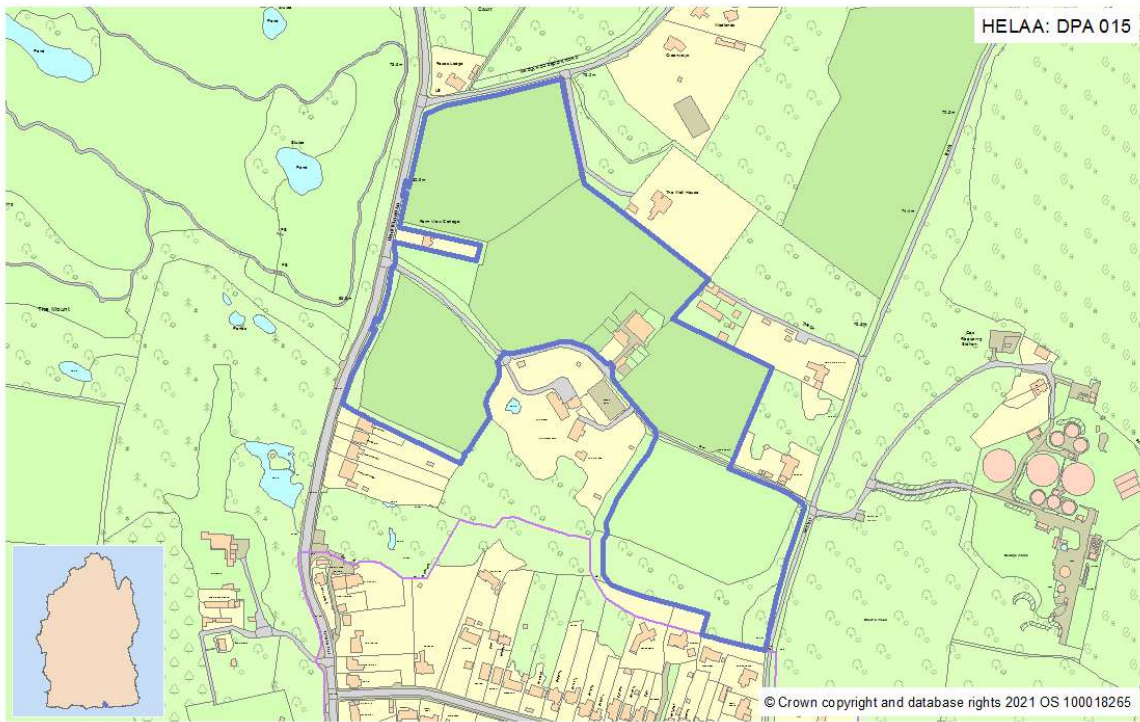


Barnfield War Coppice Road Caterham



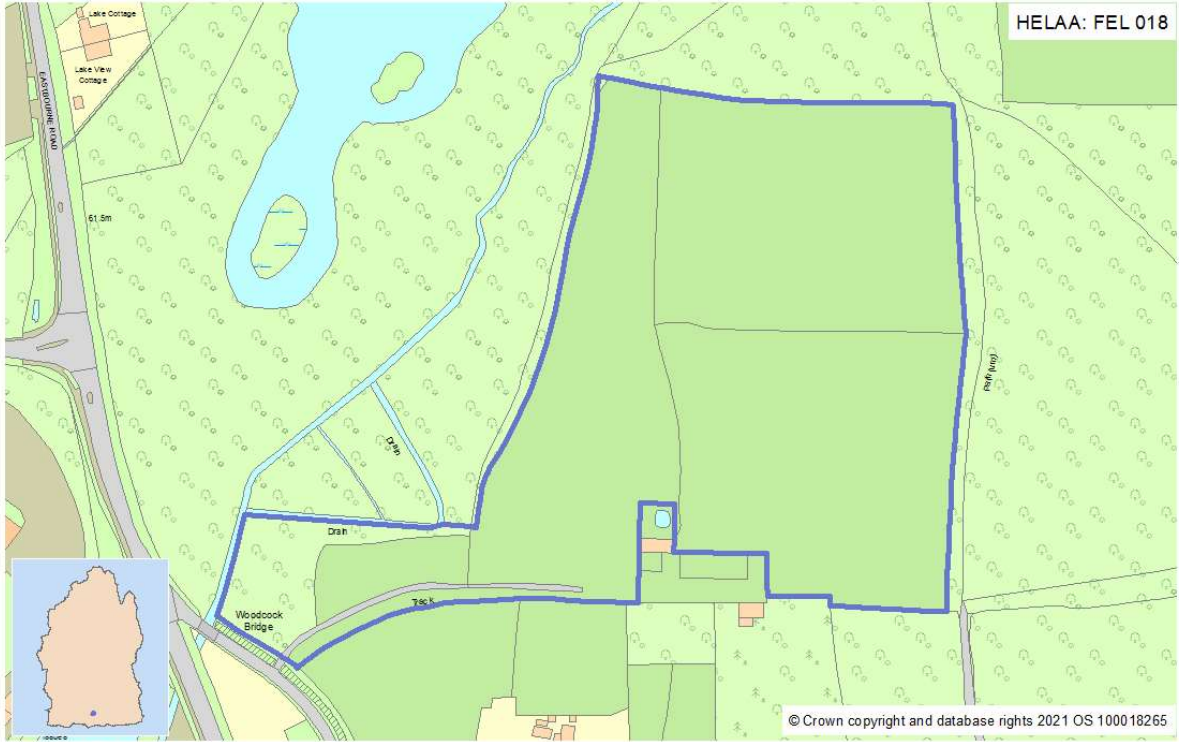
Tandridge
District Council

Cromlech Felcourt Road East Grinstead RH19 2JR



Tandridge
District Council

Land at Frith Manor Farm



Land north east of Woodcock Hill Eastbourne Road RH19 2RE



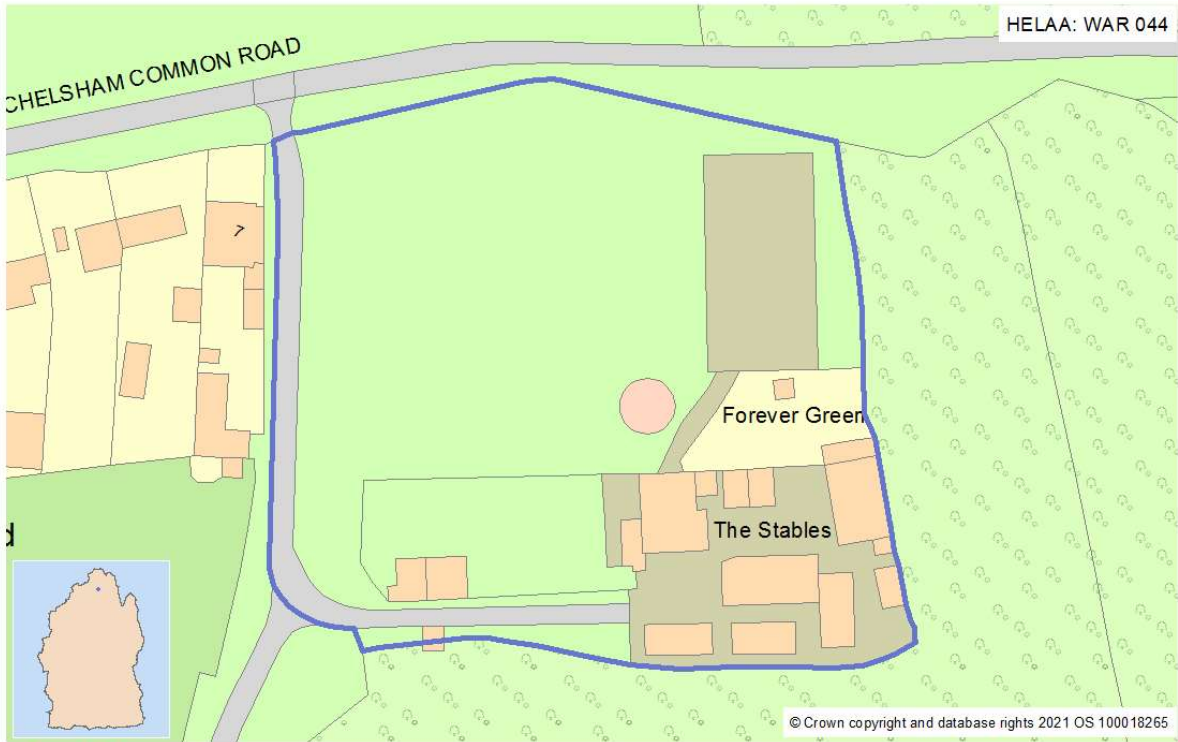
Land north of Kings Cross Lane Nutfield RH1 5NY



Plot O and P, Church Lane, Chelsham



Plot D, Church Lane, Chelsham



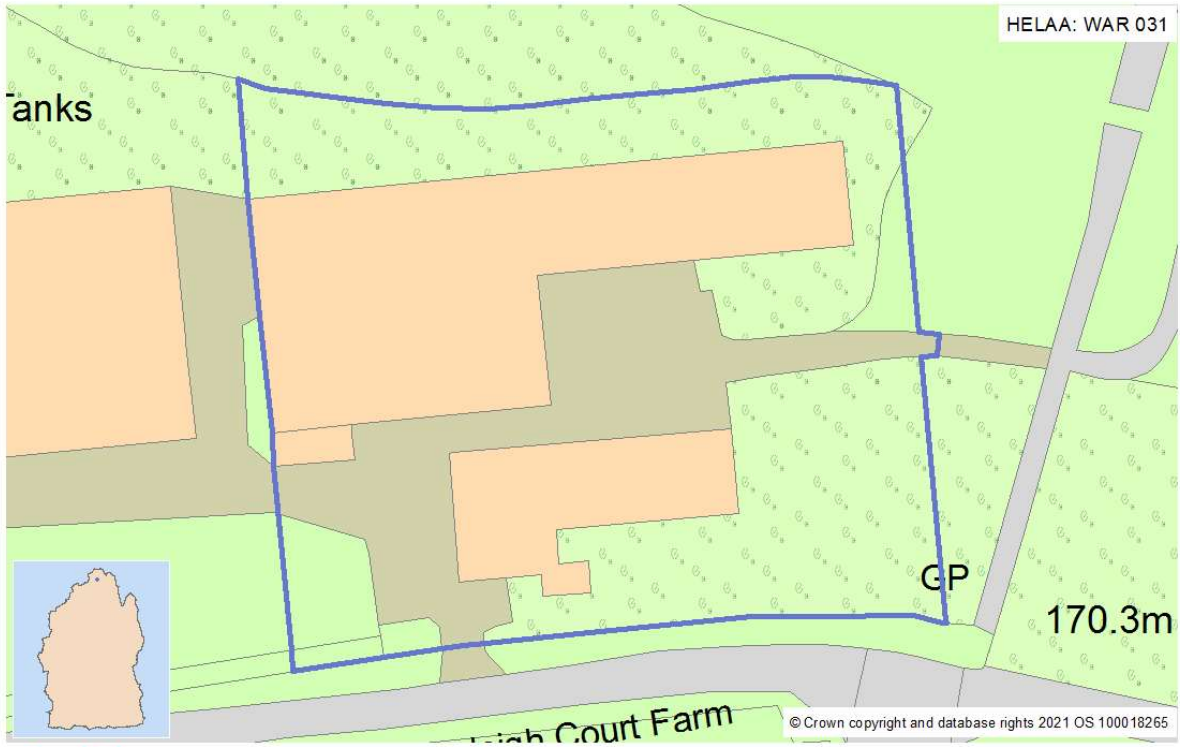
Forever Green, Chelsham Common Road, Chelsham



Joysons Hill, Church Road, Whyteleafe

Amended sites

HELAA Reference	Site Name	Site Status	Reason
CAT 008	Land at Stanstead Road and Willey Lane	Unsuitable	Minor boundary change to include land south-west of site. The site remains unconnected to the boundaries of a sustainable settlement.
NUT 009	Robert Denholm House, Bletchingley Road, Nutfield	Unsuitable	Significant boundary change that includes land to the south east of the site. The site remains unconnected to the boundaries of a sustainable settlement.
SMA 015	Chapel Road	Suitable	
WAR 031	Farleigh Court Golf Club, Old Farleigh Road, Farleigh	Unsuitable	Significant reduction in original site boundary to the east of the site. The site remains unconnected to the boundaries of a sustainable settlement.



Land adjacent to Farleigh Court Farm, Farleigh Court Road, Farleigh

Appendix 3: Additional Sites for consideration in the next HELAA review

In accordance with the Council's HELAA Methodology, new sites can be submitted to the process at any time; however, there is a closing date for any new submissions each year to allow for a review of the HELAA to take place. This year the date was 30 April 2021. During the intervening period between the closing date and the point of writing, two sites have been submitted. The basic details of these additional sites are set out below and they have not been assessed in any detail. The Council will continue to accept sites but they will not be considered until the next review of the HELAA.

Site name	Ward	Site size (hectares)	Proposed use	Estimated potential yield	Comments
Green Lane, Shipley Bridge, RH6 9TJ	Burstow, Horne and Outwood	0.28	Housing	2-3 units	No detailed assessment has been undertaken however the site is not of a size capable of delivering five or more dwellings. The site is also unconnected to the boundaries of a sustainable settlement and is therefore not considered suitable.



Green Lane, Shipley Bridge