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1. **Introduction & Policy Context**

1.1 The Strategic Housing Land Availability Assessment (SHLAA) is a key component of the evidence base to support the delivery of sufficient land for housing in Tandridge. It provides information on the opportunities and choices that are available and is an important evidence source to inform plan-making, but does not in itself determine whether a site should be allocated for housing development.

1.2 The National Planning Policy Framework (NPPF) provides new guidance on how Local Authorities should identify and meet housing needs. Local authorities should assess housing requirements and develop an approach to manage and implement housing land supply through their Local Plans. The Government aims to significantly boost the supply of housing and requires an evidence based approach in assessing the needs of the district and the subsequent identification of specific deliverable sites for housing development.

1.3 In paragraph 47 the NPPF states that there is a requirement for Local Authorities to “use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period”. This differs from previous Government policy that allocated housing targets to Local Authorities. The Government now requires Local Authorities to identify and update on a yearly basis a specific supply of deliverable sites. These must provide 5 years worth of housing against the requirements for the district with an additional buffer of 5% to ensure choice and competition. Identifying developable sites or broad locations that can be delivered to accommodate further housing development in order to meet the needs of the district for years 6 to 10 and 11 to 15 of the plan period should also be included.

1.4 Paragraph 159 of the NPPF requires Local Planning Authorities to prepare a SHLAA to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet identified need for housing over the plan period.

1.5 The purpose of this Methodology is to set out the approach to be used by Tandridge Council in preparing a SHLAA that meets the requirements of the Government, by ensuring conformity with the National Planning Policy Framework and Planning Practice Guidance (PPG). It is important to note that whilst the SHLAA identifies potential housing sites, it does not allocate sites for development. The allocation of future sites for housing will take place
through the local plan process which will undergo full consultation and an examination in public before any decision is made.

**Tandridge Housing Context**

1.6 Tandridge is a predominantly rural district. There are three main urban areas: Caterham, Warlingham/Whyteleafe in the north and Oxted/Hurst Green/Limpsfield just south of the M25 motorway. There are two larger rural settlements that are excluded from the Green Belt: Lingfield in the south-east and Smallfield in the south-west. There are also a number of villages and some other smaller settlements with additional areas of sporadic development in the Green Belt. The central part of Woldingham is also excluded from the Green Belt and forms a “detached” built up area. Approximately 94% of Tandridge is Green Belt. Any new residential development proposal must demonstrate that it will be sustainable, in accordance with paragraph 14 of the NPPF.

2. **Methodology**

2.1 This section sets out the approach for preparing the SHLAA. The Government’s current guidance is detailed within the PPG. It states that an assessment should meet the following aims:

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

2.2 The methodology set out by the Government will be adopted by Tandridge Council in line with national planning policy to ensure the approach is robust and transparently prepared. This methodology is not a word for word repeat of the PPG as there are parts of this assessment that require specific local interpretation that deviates from the guidance laid out in the PPG. The reasons for doing so are set out as follows.

2.3 The majority of land within Tandridge is designated Green Belt. As national policy heavily restricts development in the Green Belt, a “two tier” approach is proposed for carrying out the SHLAA. This will involve first assessing sites within designated urban areas (Phase 1). Following surveying and consideration of potential sites received during a ‘call for sites’, it may then be necessary at stage 4 of the methodology to assess sites outside of the built up areas. This is subject to the number of sites received as well as their size and suitability and concurrent work on establishing the need for housing in the
District. By conducting the SHLAA in this way it is hoped that a more thorough and efficient assessment of the most desirable areas for housing development will follow. If it is determined that there are insufficient sites within the built up areas of Tandridge to meet the need for housing then another call for sites and assessment will be carried out (Phase 2), now taking into account a broader scope of sites from areas outside the district’s urban centres. This approach is visualised in the flow chart on the next page and is generally consistent with the advice in the PPG: -Methodology stage 4: Assessment Review.
In line with policy in the NPPF land that falls into Green Belt designation areas will not be considered suitable for housing development. The PPG provides additional guidance that "unmet housing need...is unlikely to outweigh the harm to the Green Belt and other harm to constitute the 'very special circumstances' justifying inappropriate development on a site within the Green Belt". It also states that sites and locations should be assessed against
national policies to establish which have reasonable potential for development. Because of the significant National and District policy weighted against development in the Green Belt, sites for housing in Green Belt areas will therefore not be considered suitable or achievable under Phase 1.

2.5 Any sites submitted under the initial call for sites within designated Green Belt areas will be held on a list by the Council. In the event that evidence within the SHMA suggests insufficient suitable sites within urban areas can be identified, sites within the Green Belt may then be assessed and if they are considered suitable under SHLAA criteria they will remain within the Green Belt and their final suitability will be determined through the allocations process as part of the Local Plan preparation. The extent of the Green Belt can only be amended through the adoption of a local plan. It is necessary for potential sites to be examined as a collective and not on an individual site by site basis.

2.6 Sites in remote areas away from settlements or built up areas are unlikely to be considered sustainable locations. The NPPF places heavy emphasis on sustainable development as the key principle behind planning and therefore sites that are unsustainable will be considered neither suitable nor achievable. These sites may be assessed as part of a subsequent Green Belt site assessment as listed above, but having regard to policy in the NPPF and PPG they may be excluded in favour of land in sustainable locations. Excluded sites may be listed in an appendix in the final SHLAA report purely for record purposes.

2.7 Although Woldingham and the Larger Rural Settlements of Lingfield and Smallfield are currently considered to be less sustainable locations than Caterham, Oxted/Hurst Green/Limpsfield or Warlingham/Whyteleafe, they will be included in the assessment as they may help to meet the needs of rural communities.

2.8 Green Belt settlements are now referred to as “Defined Villages in the Green Belt” in which limited infilling is permitted in accordance with the NPPF and Policy DP12 of Tandridge’s Detailed Policies Part 2. Therefore any sites that are identified within this classification may be considered in the SHLAA.

2.9 The need for a new free standing settlement will not be considered through the SHLAA process.

2.10 The SHLAA will aim to cover as many potential sources of housing land as possible within the district. Regard will be had when identifying sites to the potential sources set out in the Planning Practice Guidance, including:

1) Sites in the planning process:
   a. Land allocated (or with permission) for employment or other land uses which are no longer required for those uses
• Existing housing allocations and site development briefs
• Unimplemented/outstanding planning permissions for housing
• Sites with planning permission for housing that are under construction

2) Sites outside the Planning system:
• Vacant and derelict land and buildings
• Surplus public sector land
• Land in non-residential use which may be suitable for re-development for housing, such as commercial buildings or car parks, including as part of a mixed-use development
• Additional housing opportunities in established residential areas, such as under-used garage blocks
• Large scale redevelopment and re-design of existing residential areas
• Sites in rural settlements and rural exception sites
• Urban extensions (under Phase 2)
• Sites where planning permissions was granted but then lapsed without development being started

2.11 The PPG advises that effective planning for a SHLAA must involve cooperation with relevant bodies and other third parties in line with Duty to Cooperate. The more Tandridge Council can involve key stakeholders in the planning and preparation of the SHLAA the greater the potential for sites to come forward, increasing the effectiveness and thoroughness of the assessment. The Council already has a considerable list of contacts following the previous SHLAA in 2011; these will be contacted again as well as continued partnerships with Parish Councils and other Local Authorities wherever possible. The ‘Call for Sites’ will be sent to developers, landowners and agents on the Council’s local plan mailing list. This methodology will be circulated for comment and to encourage continued involvement in the preparation of the SHLAA. This engagement may require updates to be made to this methodology.
3. **Site location identification: Stage 1**

**Determining assessment area and site size**

3.1 The SHLAA will assess the potential for housing sites initially within Tandridge’s urban areas as set out in paragraph 2.3 above. Only sites with a potential development capacity of 5 housing units or over and a size of 0.25 hectares or over will be included in the assessment. This is consistent with Planning Practice Guidance (PPG). It is essential that a site size threshold is applied to allow for an additional windfall allowance (if justified). If there is no site size threshold there is a risk of double counting.

**Desktop review of existing information**

3.2 There is a range of existing data sources that may provide useful information for potential site allocations. A number of landowners have submitted sites for consideration over the years (which the Council has held on file but not assessed) and these will be reviewed along with any other Council records that may identify potential sites. Additional sites may also be drawn from:

- SHLAA 2011
- AMR
- 5 year housing supply
- Council owned land
- Sites subject to Section 106 Agreements
- Site development briefs
- Planning applications refused or lapsed
- Logged enquiries from prospective developers/land owners
- The Council’s Housing enabling section
- Other Council departments
- Commercial property databases e.g. estate agents and property agents
- Ordnance Survey maps and aerial photography
- Register of public sector land
- Parish Council’s and Neighbourhood Plan Forums
- Data from key statutory bodies, for example the County Council

3.3 This list is not exhaustive and any sites that are brought to the Council’s attention through other means may also be assessed. It is anticipated that the majority of sites will come forward via the call for sites but by drawing from as many potential sources as possible the Council aims for a comprehensive list.

3.4 The desktop review will explore potential site allocations based on the Council’s existing information before the call for sites and surveying is
undertaken. This approach will help to ensure that sites are not “double counted” as sites submitted previously may have been developed. Additionally, sites that were considered undeliverable in the 2011 SHLAA must be verified to see if this position still stands or if they could now provide a potential source of land for housing.

**Call for sites**

3.5 The “Call for sites” is a valuable source of information by which individuals and companies can put forward sites for consideration. The call for sites will be run from XX/XX/XXXX to XX/XX/XXXX. All that is required for a potential site submission is a clear site address and a location plan showing the site boundary in red, although other supporting information in regards to constraints, ownership, current use or any other relevant data may be useful in assessing a site’s potential.

3.6 A potential housing site form will be available for applicants to submit their sites. This is attached at Appendix 1. An on-line version is also available.

**Site Survey**

3.7 Guidance in the PPG states that submitted sites should be assessed against national policies and designations to establish whether they have a “reasonable potential for development” and therefore assess what their potential is to be surveyed in more detail. The purpose of a site survey is to:

- Ratify information gathered through the call for sites and desk assessment
- Get an up to date view on development progress (where sites have planning permission)
- A better understanding of what type and scale of development may be appropriate
- Gain a more detailed understanding of deliverability, identify any barriers that may exist and how they could be overcome
- Identify further sites with potential for development that were not identified through data sources or the call for sites.

3.8 All sites received within the district’s urban areas, Larger Rural Settlements or Defined Villages in the Green Belt will be surveyed to ensure a thorough assessment of their potential to be allocated for housing development. Sites submitted in the Green Belt will only be surveyed in Phase 2 if it is determined that there is insufficient land available in the urban areas / villages as evidenced by the SHMA. Sites in remote unsustainable areas are unlikely to be surveyed in detail.
3.9 The survey will record information regarding site characteristics and known constraints, including:

- Size
- Boundaries
- Current use
- Character of the area
- Any physical constraints such as access
- Any risk of flooding
- Development progress
- Surrounding land use
- Initial assessment as to whether the site may be suitable for housing or a mixed use development.
- Policy constraints (which will need testing for appropriateness)

3.10 A standard survey sheet (Appendix 2) will be used to gather information and those undertaking the survey work will be briefed to ensure consistency of approach. The PPG states that site surveys should be proportionate to the detail needed for a robust appraisal and sites that are considered to be more realistic for potential housing development should be surveyed in greater detail.

4. **Site assessment: Stage 2**

4.1 Assessing a site’s potential for development involves four main steps. At all stages the Council will seek to identify solutions in order to overcome constraints where appropriate to allow sites to be potentially designated for housing.

4.2 **Step 1**: Estimate the development potential of a site. The PPG advises that calculating housing potential should be guided by existing or emerging plans and locally determined policies on densities. Policy DP7 from Tandridge’s ‘Local Plan Part 2 - Detailed Policies’ advises that any proposal must be “in keeping with the prevailing landscape / streetscape, reflecting the variety of local building types by using complementary building materials and designs, and does not result in overdevelopment or unacceptable intensification by reason of scale, form, bulk, height, spacing, density and design.” Paragraph 47 of the NPPF states that housing densities should reflect local circumstances. Potential development densities for sites will therefore be calculated based on the nature of the area, comparable schemes within the locality and finally their accordance with the PPG, NPPF and DP7. It should be noted that if any Neighbourhood Plans are adopted before the SHLAA
process then any relevant policies will be taken into consideration in the calculation of densities.

4.3 **Step 2:** Assess the suitability of the site. The PPG advises that the suitability of the identified use for the site must consider the needs of the community and the broader housing market area, for example:

- market housing
- private rented
- affordable housing
- Self build schemes
- Housing for older people
- Economic development uses

4.4 The NPPF places heavy weight on the preservation and maintenance of areas with environmental constraints which severely restrict development. A site is likely to be considered unsuitable for development if any of the following constraints apply:

1) The site is wholly within an Environment Agency designated Flood Zone 2 or 3. Paragraph 99 of the NPPF directs Local Authorities to ensure that new developments are not at risk from flooding nor increase the risk of flooding elsewhere.

2) Other environmental or historical designations for example:

   - Sites of Special Scientific Interest (SSSI)
   - Areas of Outstanding Natural Beauty
   - Areas of Great Landscape Value
   - Ancient Woodlands
   - Local Nature Reserves
   - Ancient Monuments

4.5 There are other constraints which can restrict the potential suitability for development. These can include physical problems or limitations of the site or surroundings:

- There is no suitable access to the site
- The land is unsuitable for building due to topography or ground conditions
- Suitable drainage, water supply, power or other infrastructure is not available and there is no prospect that it can be made available.
4.6 Development potential can be limited if the development of a site would have a detrimental impact on the character of a conservation area, setting of a listed building, protected trees or other features worthy of protection.

4.7 Green Belt is a policy constraint. Unlike AONB for example, Green Belt designations are capable of amendment. As such sites within the Green Belt may be assessed under the SHLAA (phase 2), but the ultimate decision to release a site for development will be taken through the preparation of the Local Plan and in light of a District wide assessment of how specific areas contribute to the purposes of the Green Belt. It may also be considered that development of land adjacent to Green Belt areas may impact on the openness of the Green Belt and this may limit a site’s potential.

4.8 **Step 3:** Is the site available: A site assessment form will be used to establish the following:

- 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?

4.9 The PPG also advises that consideration should be given to the delivery records of developers or landowners and whether the planning background of a site shows a history of unimplemented permissions. It is important to remember that the existence of a planning permission does not necessarily guarantee the site is available; anyone can make a planning application on a site regardless of ownership.

4.10 **Step 4:** Is the site achievable; Market / Cost / Delivery Factors. The Council considers a site to be achievable for development where there is a reasonable prospect that housing will be developed on the site at a particular point in time. This requires a judgement on the economic viability of a site and the capacity of the developer to complete and sell the housing over a certain period. Where constraints have been identified the Council will aim to assess what measures could be taken and by whom to ensure development could be achieved.
5. **Windfall assessment: Stage 3**

5.1 The NPPF advises that Local Planning Authorities may make an allowance for non-residential windfall sites\(^1\) in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. The Council’s view is that the delivery of unidentified small sites in the district has been and will continue to be an integral source of housing supply, and that the SHLAA should include a calculation of potential housing delivery through windfall sites. 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:

1) They have compelling evidence that such sites have consistently become available in the local area; and
2) These sites will continue to provide a reliable source of supply.

5.2 Any allowance should be realistic and have regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.

5.3 The Council proposes to only include windfall estimates for small non-residential sites of between 1 and 9 net dwellings. Sites providing net dwellings above this figure will be included as part of the routine SHLAA process, as stated previously in the methodology.

5.4 Tandridge District Council believes it of fundamental importance to include windfall sites. All development proposals that may result from land allocations will be thoroughly integrated with the plans of the Council as well as programmes and budgets of infrastructure and service providers and other stakeholders so they are able to plan for the total number of dwellings expected to be delivered. To not include unidentified small sites (i.e. windfalls) when they are an integral component of land supply in the district would underestimate the total delivery of housing supply. This would be inconsistent with a thorough and effective approach and undermine the robustness of the SHLAA.

5.5 **Appendix 3** sets out how the windfall allowance has been calculated; it concludes that a rate of 37 dwellings is realistic. However given the improvements in the housing market nationally rates may improve. Therefore

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\(^1\) The Council has consistently had a contribution to the housing supply from residential windfall sites; however the Government has excluded this element from windfall calculations (NPPF para. 48). This is regrettable given the significance of this element in Tandridge. However the Council is bound by the Government guidance.
the actual windfall rates will need to be monitored and any noticeable increases taken into account.

6. **Assessment Review: Stage 4**

6.1 Once all the sites have been surveyed and assessed for the development potential an indicative trajectory can be produced to set out how much housing can be provided in the district during the set year periods.

6.2 Depending on the results the SHLAA may deviate at this point from the structure outlined in the PPG. If it is considered that identified sites within urban areas, as evidenced through the SHMA, cannot provide enough housing to meet the District’s requirements, the SHLAA will return to stage 1 with a call for sites that may now fall outside of the designated urban areas (Phase 2 of the SHLAA process). Sites received will again undergo a full survey and assessment to determine their development potential and suitability in accordance with stage 2 of the methodology, although remote unsustainable locations are unlikely to be subject to a detailed assessment.

6.3 If there still remains an insufficient supply of land suitable for housing the PPG advises that it may be necessary to plan how this shortfall should best be managed. The Council’s ongoing review of the Core Strategy will need to take this into consideration as well as continued work with neighbouring Local Authorities through duty to cooperate to identify and reach a solution.

7. **Final evidence base: Stage 5**

7.1 The SHLAA will aim to produce a full set of information to form the Council’s evidence base on the availability of housing land in the district. Following guidance from the PPG these will include:

1) A list of all sites considered, cross referenced to their locations on maps;
2) An assessment of each site or broad location, in terms of suitability for development, availability, and achievability including whether the site is viable, to determine whether a site is realistically expected to be developed and when;
3) Contain more detail for those sites which are considered to be realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons;
4) The potential type and quantity of development that could be delivered on each site, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when; and
5) An indicative trajectory of anticipated development and consideration of associated risks.

7.2 The assessment will be published on the Tandridge District Council website to ensure it is publicly available.
Appendix 1- Housing Site Proforma

Tandridge Strategic Housing Land Availability Assessment
Potential Housing Site Proforma

Please use this form to request that a site be included within the Strategic Housing Land Availability Assessment. Please use a separate form for each site.

Please enclose an Ordnance Survey based map indicating in red the boundaries of the site.

Contact details:

<table>
<thead>
<tr>
<th>Your details</th>
<th>Agent details (if applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name:</td>
<td>Name:</td>
</tr>
<tr>
<td>Address:</td>
<td>Address:</td>
</tr>
<tr>
<td>Postcode:</td>
<td>Postcode:</td>
</tr>
<tr>
<td>Tel No:</td>
<td>Tel No:</td>
</tr>
<tr>
<td>Email:</td>
<td>Email:</td>
</tr>
</tbody>
</table>

The Site:

<table>
<thead>
<tr>
<th>Site address:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Site area (hectares):</td>
<td></td>
</tr>
<tr>
<td>How much of the site is suitable for development (hectares)? If different from total site area please indicate the development area on the map.</td>
<td></td>
</tr>
<tr>
<td>What is the site currently used for?</td>
<td></td>
</tr>
<tr>
<td>Does the site have any current existing planning permission? If yes, please provide the application number(s)</td>
<td></td>
</tr>
</tbody>
</table>
**Availability:**

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are you the sole owner of the site? If no please provide owner contact details of all if there are multiple owners.</td>
<td>Yes / No</td>
</tr>
<tr>
<td>If there is an existing use on the site how long is this expected to continue?</td>
<td></td>
</tr>
<tr>
<td>If the existing use is being relocated please provide details.</td>
<td></td>
</tr>
<tr>
<td>Is the site for sale? If yes, how long has the site been for sale?</td>
<td>Yes / No</td>
</tr>
<tr>
<td>When, in your opinion, could the site be made available for development?</td>
<td></td>
</tr>
<tr>
<td>Possible constraints:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Constraint type</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy constraints</td>
<td>Yes / No</td>
</tr>
<tr>
<td>Flooding</td>
<td>Yes / No</td>
</tr>
<tr>
<td>Access difficulties</td>
<td>Yes / No</td>
</tr>
<tr>
<td>Tree cover</td>
<td>Yes / No</td>
</tr>
<tr>
<td>Biodiversity</td>
<td>Yes / No</td>
</tr>
<tr>
<td>Contaminated land</td>
<td>Yes / No</td>
</tr>
<tr>
<td>Adequate infrastructure not available</td>
<td>Yes / No</td>
</tr>
</tbody>
</table>

**What and when development might be achieved:**

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>How many dwellings do you think the site could accommodate?</td>
<td></td>
</tr>
<tr>
<td>Would you consider a mixed development would be appropriate / required?</td>
<td></td>
</tr>
<tr>
<td>Please give an indication of the timescale required to deliver the site (assuming subsequent granting of planning permission):</td>
<td></td>
</tr>
<tr>
<td>Land assembly/ownership issues</td>
<td>Yes / No</td>
</tr>
<tr>
<td>-------------------------------</td>
<td>---------</td>
</tr>
<tr>
<td>Market viability</td>
<td>Yes / No</td>
</tr>
<tr>
<td>Other constraints (please state)</td>
<td>Yes / No</td>
</tr>
</tbody>
</table>

Do you believe that any constraints you have identified can be overcome? If yes please explain.

**Survey Issues:**

In identifying a site you are giving permission for an officer of the Council to access the site in order to ascertain site suitability. In this context would there be any access issues to the site?  

Yes / No

If yes, please provide contact details of the person who should be contacted in case we need to arrange a site visit:
## Appendix 2 – Site Assessment form

### Tandridge SHLAA – Site assessment form

<table>
<thead>
<tr>
<th>Site reference:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site address:</td>
</tr>
<tr>
<td>Current use:</td>
</tr>
<tr>
<td>Site area:</td>
</tr>
<tr>
<td>Site location plan to be inserted here</td>
</tr>
</tbody>
</table>

### Policy constraints:

### Physical constraints/limitations:

### Environmental constraints:

### Other constraints:

### Site suitability:

### Site availability:

### Site achievability:

### Viability:

### Deliverability / Developability:

### Timescale of development:

### Measures required to bring site forward (if any):

<table>
<thead>
<tr>
<th>Number of units:</th>
<th>Approximate density:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Net:</td>
<td>Gross:</td>
</tr>
</tbody>
</table>
Appendix 3 – Windfall Calculation

1. The windfall calculation for Tandridge is based on the average net completions on sites with a total capacity of 9 or less dwellings in the years 2004 - 2014. The figures are shown below in the table. Although historically windfall calculations in the district have included residential land the NPPF states that residential land should be excluded from the overall calculation. This figure has been included purely as a reference but no longer forms part of the calculations for the projected windfall delivery of housing.

2. The average windfall delivery rate of dwellings on sites of 9 or less total net capacity between 2004 and 2014 is 72. This is demonstrated on the table below and excludes residential land.

<table>
<thead>
<tr>
<th>Year</th>
<th>Total Completions</th>
<th>Net gain from windfall sites 9 or less total net capacity</th>
<th>Net gain from windfall sites 9 or less total net capacity, excluding residential land</th>
<th>Net gain from windfall sites 10 or more total net capacity</th>
<th>Net gain from windfall sites 10 or more total net capacity, excluding residential land</th>
</tr>
</thead>
<tbody>
<tr>
<td>2004/2005</td>
<td>190</td>
<td>162</td>
<td>89</td>
<td>28</td>
<td>28</td>
</tr>
<tr>
<td>2006/2007</td>
<td>459</td>
<td>225</td>
<td>130</td>
<td>234</td>
<td>184</td>
</tr>
<tr>
<td>2007/2008</td>
<td>285</td>
<td>249</td>
<td>91</td>
<td>36</td>
<td>36</td>
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<tr>
<td>2008/2009</td>
<td>297</td>
<td>194</td>
<td>32</td>
<td>103</td>
<td>0</td>
</tr>
<tr>
<td>2009/2010</td>
<td>172</td>
<td>172</td>
<td>46</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>2010/2011</td>
<td>132</td>
<td>122</td>
<td>31</td>
<td>10</td>
<td>10</td>
</tr>
<tr>
<td>2011/2012</td>
<td>261</td>
<td>128</td>
<td>30</td>
<td>133</td>
<td>29</td>
</tr>
<tr>
<td>2012/2013</td>
<td>221</td>
<td>72</td>
<td>31</td>
<td>149</td>
<td>58</td>
</tr>
<tr>
<td>2013/2014</td>
<td>257</td>
<td>78</td>
<td>57</td>
<td>179</td>
<td>126</td>
</tr>
<tr>
<td>Average</td>
<td>257</td>
<td>167</td>
<td>72</td>
<td>90</td>
<td>50</td>
</tr>
</tbody>
</table>

3. Recent trends have been considerably lower than 2004 – 2008. Paragraph 48 of the NPPF advises that projecting windfall allowances should consider expected future trends. Because it is unlikely that windfall delivery rates will reach the levels of 2004 – 2008 a lower estimate should be used, taking into account more recent trends. The average number of dwellings delivered on windfall sites between the monitoring years 2008 / 2009 to 2013 / 2014 is 38. This should be used as an alternative figure recognizing that delivery rates prior to 2008 are unlikely to be repeated due to increasingly limited space within the district. This is shown below in the graph.
4. Since the adoption of the Local Plan Part 2: Detailed Policies limited infilling within a number of defined villages within the Green Belt is no longer permitted and Green Belt policy applies. It is not considered that these locations will provide any housing windfalls in the future. Previous windfall figures from these locations should be removed from the calculation. Although the contribution from this source was limited amounting to an average of 1 dwelling a year over the period 2004 – 2014, it is considered thorough to take it into consideration to ensure the windfall calculation is as accurate as possible. This is demonstrated in the table below.

<table>
<thead>
<tr>
<th>Year</th>
<th>Dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td>2004 / 2005</td>
<td>0</td>
</tr>
<tr>
<td>2005 / 2006</td>
<td>0</td>
</tr>
<tr>
<td>2006 / 2007</td>
<td>0</td>
</tr>
<tr>
<td>2007 / 2008</td>
<td>0</td>
</tr>
<tr>
<td>2008 / 2009</td>
<td>0</td>
</tr>
<tr>
<td>2009 / 2010</td>
<td>0</td>
</tr>
<tr>
<td>2010 / 2011</td>
<td>0</td>
</tr>
<tr>
<td>2011 / 2012</td>
<td>4</td>
</tr>
<tr>
<td>2012 / 2013</td>
<td>0</td>
</tr>
<tr>
<td>2013 / 2014</td>
<td>3</td>
</tr>
<tr>
<td><strong>Average 2014</strong></td>
<td><strong>1</strong></td>
</tr>
</tbody>
</table>

5. This brings the windfall calculation down to an average of 37 homes per monitoring year.

6. There are a number of other factors to consider when estimating future trends. Firstly, figures from the Office of National Statistics show that seasonally-adjusted housing starts in the June quarter 2014 increased by 18
per cent on the same quarter a year earlier while completions estimated at 29,540 in the June quarter 2014 were six per cent higher than the previous quarter. This could indicate an improvement in the housing market at a national level that may result in a higher windfall delivery rate in the district.

7. This is further supported by a marked increase in the number of planning applications granted permission for small dwellings in the last three years. This is shown in the graph below.

![Graph showing small dwelling sites granted permission 2004 - 2014](image)

8. Although the figures vary between 2007/2008 – 2011/2012 reflecting the economic downturn in the market, there has been an increase since 2011/2012. It should be noted that although these figures do not distinguish between dwellings on garden land or previously developed land they remain an indication of the trends in the housing market. This could therefore indicate that the future windfall figure may increase over the years.

9. Secondly, changing policy can influence the delivery rates of windfall sites. District Policy has remained unchanged aside from the changes made through the adoption of the Local Plan Part 2: Detailed Policies as discussed previously. At a national level, however, since May 2013 premises in B1 (a) office use can change to C3 residential use, subject to prior approval covering flooding, highways and transport issues and contamination. This may contribute to an increase in the delivery of windfall sites.

10. The graph below is an indicative representation of the possible future direction windfall delivery rates could take as shown through the various different factors that could influence them.
11. **Summary of potential future Trends**

Evidence that could contribute to an increased windfall delivery:

- Housing market picking up – increased starts and increasing completions
- Restrictions removed on change of use from B1(a) premises to C3
- Recent trends indicate greater number of planning applications for sites with total net capacity 9 or less

Evidence that could contribute to a reduced windfall delivery rate:

- Limited supply of land within the district
- Increased demand for small commercial premises reducing availability of sites for housing