

# Appendix 1

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## Methodology

**Guildford Borough Council**

**2021**

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## **Methodology Overview**

- 1.1 As noted in the Land Availability Assessment ('LAA'), national Planning Practice Guidance ('PPG') outlines a five stage process which, when followed, leads to the robust assessment of land availability. This advice has been followed when implementing the LAA methodology and undertaking the site assessments.
- 1.2 Briefly, the Council's application of this five stage approach was carried out in 7 broad steps, which are discussed in detail below:
  1. Determine assessment area and site size,
  2. Desktop review of existing information,
  3. Call for sites,
  4. Site survey,
  5. Site assessment,
  6. Windfall assessment, and
  7. Assessment review.

The distinct stages outlined above were conducted sequentially where possible. However, the implementation of the stages often overlapped in practice.

- 1.3 This appendix outlines the stages of the LAA methodology process respectively in detail below.

## **Detailed LAA Methodology Review**

### **Stage 1 – Site Assessment Area and Site Size**

- 2.1 The extent of the assessment area is the Borough Council boundary. Although the Housing Market Area ('HMA') extends to include both Waverley and Woking Borough Council areas, keeping the assessment to the Borough boundaries represents the most pragmatic approach. Both Waverley and Woking Borough Councils have undertaken their own Land Availability Assessments. The three documents can be used together to understand the overall potential supply of land within the HMA.
- 2.2 Regarding site size, the PPG recommends that "*the assessment should consider all sites and broad locations capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares (or 500sqm of floorspace) and above*"<sup>1</sup>. The Council has adopted this approach.

### **Stage 2 – Review of Existing Information**

- 2.3 In accordance with the PPG guidance<sup>2</sup>, the Council considered a comprehensive range of sources in order to establish the best available information to identify and assess potential development sites. Sources used in the desktop review of existing information include, but are not limited to, previous iterations of the LAA, information submitted through the 'Call for Sites' process, recently refused or withdrawn planning applications, allocated sites in other Plans, and the Brownfield Land Register.

<sup>1</sup> Paragraph: 010. Reference ID: 3-010-20140306.

<sup>2</sup> Paragraph: 012. Reference ID: 3-012-20140306.

2.4 The Council has explored the following primary sources of potential supply, amongst others, in order to identify a sufficient supply and mix of housing sites in accordance with the PPG guidance. These sources of information and their review are set out below:

### **1. Previous Guildford Borough LAA (2020)**

The site appraisals presented in the previous LAA (2020) have been reappraised in light of updated evidence regarding the potential deliverability of each site that has been made available following the publication of the LAA (2020).

In conducting appraisal, the Council has contacted all landowners and/or site promoters of sites included in the previous LAA to request updated information regarding the deliverability of the relevant site.

The evidence provided has then been appraised in light of the definitions of *deliverable* and *developable* sites in the NPPF. This review informed the estimation of the sites' delivery timescales and their estimated delivery trajectory. Due to this reappraisal, some sites in the previous LAA have been removed, or their estimated delivery trajectory has been amended.

Table 2 in Appendix 7: Deliverability Evidence outline a summary of the deliverability evidence that has supported the inclusion of each site within the LAA at its particular estimated delivery trajectory. Further detail for each site is provided in the site appraisals that form Appendix 2: Realistic Candidates for Development. The Council cannot directly publish the evidence obtained to justify each site, but may be able to provide redacted copies, which do not include personal information, of the evidence on request.

### **2. Recently refused or withdrawn planning applications**

The review of recently refused or withdrawn planning applications can identify new sites with the potential to deliver homes within the Plan period, provided that an appropriate planning application is made. Sites identified through this review were appraised in light of relevant information regarding the *suitability*, *availability* and *achievability* of the site, as elaborated below, which is set out in Appendix 2: Realistic Candidates for Development, and Appendix 3: Discounted Sites.

### **3. Review of current planning applications**

The review of planning applications that are currently awaiting determination can identify sites with the potential to deliver homes within the Plan period. Sites identified through this review were appraised in light of relevant information regarding the *suitability*, *availability* and *achievability* of the site, as elaborated below, which is set out in Appendix 2: Realistic Candidates for Development, and Appendix 3: Discounted Sites.

#### **4. Review of site allocations**

Sites allocated in the recently adopted Local Plan: strategy and sites (2019 – 2034) have been reviewed in light of new information provided through the LAA review. Updated evidence was requested from the site owners or promoters as per point 1 above. The updated information helped to re-appraise the assessment of deliverability on these sites where appropriate. Additionally, site allocations provided in adopted and emerging Neighbourhood Plans within the borough have been appraised accordingly.

- 2.5 During the review of planning application information, LAA sites have been checked against planning application approval records in order to avoid double counting of any sites. Sites previously assessed to have the potential to deliver homes within the plan period that have since gained planning permission have been removed from Appendix 2: Realistic Candidates for Development and the permission has instead been counted in the 'Outstanding Capacity' section of the housing trajectory.

#### **Stage 3 – Call for Sites**

- 2.6 A call for sites has been advertised on the Council's website throughout the year in order to establish initial land availability for all types of development, including housing, employment and retail. Local landowners, developers, businesses and other interested parties were invited to submit sites to the Council for appraisal. The advertised call for sites requested that submissions be entered by 1<sup>st</sup> September 2021, which is the cut-off date for site evidence for this assessment.

#### **Stage 4 – Site Survey**

- 3.1 Site surveys have been conducted on all sites submitted to the Council through the call for sites. The site surveys incorporated information and constraint data from the Council's Geographic Information System (GIS), information provided on the submission form, information available from previous planning applications, and information gathered through other desk-based research. The surveys set out the key issues and potential constraints for each site and what further consideration may be required as part of any subsequent planning application.
- 3.2 Where appropriate, sites have been visited by planning officers in order to verify the assessment of the site. These site visits also enabled officers to establish whether there were any additional uses and/or constraints present on the site that had not been picked up during the desktop-research exercise.

## Stage 5 – Site Assessment

### Suitability Assessment

- 4.1 The assessment of site suitability for development is a high-level assumption about whether the site *could* be developed, rather than whether the site *should* or *would* be developed. The suitability of a site is only one aspect of the LAA assessment, though it is a critical test.
- 4.2 In determining the site's suitability, the Council has taken into account available information to help construct an understanding of the site in relation to its development potential. To assess suitability, aspects including the location of the site, current planning designations relevant to the site, and other evidence documents (such as the Local Plan) have been considered.
- 4.3 PPG advises that assessing the suitability of sites for development should be guided by:
- the existing development plan, emerging plan policy and national policy, and
  - market and industry requirements in that housing market or functional economic market area.

PPG also advises that the following criteria should be considered; physical limitations, potential impacts, contribution to regeneration priority areas, environmental/amenity impacts, and the site's appropriateness and likely market attractiveness for the type of development proposed.

- 4.4 In order to make an accurate assessment, both environmental and physical constraints have also been considered in addition to relevant policy considerations. Some sites have therefore been found unsuitable due to issues such as flooding, unsuitable access or location, and policy designations such as impact on the Area of Outstanding Natural Beauty ('AONB'). However, if the Council considered that these constraints could reasonably be overcome, the site may be considered suitable for development. This assessment is outlined in the site proforma where appropriate.
- 4.5 Some areas of Guildford borough are considered not suitable for development.
- The northern part of Guildford borough contains areas of the Thames Basin Heaths Special Protection Area ('TBHSPA'). This heathland is home to three species of rare, endangered birds, whose habitat is protected by European law. The SPA designation protects the heaths from development, including new homes nearby that could harm the SPA due to increased recreational pressure on these habitats. New homes (including traveller accommodation) are not suitable within 400 metres of the TBH SPA. However, there may be exceptions for student housing, older persons housing and employment land, which will be reviewed on a case-by-case basis.
  - Within 400m – 5km of the SPA, housing development may only be allowed providing that potential harm to the SPA is avoided, usually in the form of Suitable Alternative Natural Greenspace ('SANG'). Further detail of our SANG strategy can be found in the Infrastructure Delivery Plan and the SPA Avoidance Strategy 2017.
  - Development is also not suitable on Sites of Special Scientific Interest (SSSI) or Special Areas of Conservation (SAC).

- Other than water-compatible uses, and in some cases essential infrastructure, development is not suitable in the undeveloped or previously developed land with no building footprint (e.g. a surface car park), in the functional flood plain (Flood Zone 3b) due to high flood risk.
- A significant portion of the borough to the south is designated part of the Surrey Hills Area of Outstanding Natural Beauty (AONB). National planning policy requires that great weight is given to conserving landscape and scenic beauty in the Area of Outstanding Natural Beauty, which (along with National Parks and the Broads) have the highest status of protection in relation to landscape. The AONB is generally not suitable for major development.

### **Availability Assessment**

- 4.6 The assessment of availability helps to establish whether a site should be considered a valid option for development, relating to the landowner's willingness to see the site developed and the current use of the site. Given the role of the LAA in enabling the Council to establish a robust land supply for future development, if there is no reasonable prospect that the site will become available over the lifetime of the plan, then it has not been included as a realistic option for development.
- 4.7 In submitting sites to the Council, site promoters were asked to indicate the following on the submission form:
- Details of land ownership/land interests,
  - What the current and proposed land uses are for the site,
  - The reason that the site promoter is proposing the site for development,
  - Details of when the site is expected to become available for development, and
  - Whether there are any known constraints that could restrict the development of the land.

A judgement was then made based on the information submitted by the applicant as to whether the site was available, and when it is likely to deliver the proposed development. Further communication with the site promoter and other stakeholders has supplemented the information provided on the submission form where appropriate.

- 4.8 Sites may be considered *available* where the best information presented to the Council indicates that the site is likely to be promoted for development and that there are no constraints, or other legal or ownership complications, that could stop development happening within the Plan period. The assessment is set out clearly in the individual site proformas.

## **Achievability Assessment**

4.9 PPG advises 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. This 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”<sup>3</sup>.*

4.10 In the assessment of site achievability, officers have considered the Local Plan Viability Update (2017) and the Local Plan and CIL Viability Study (2016), in addition to other sources of information. These studies assess the policy requirements of the Local Plan, considering the broad viability for a range of theoretical sites across various sizes and uses, in addition to specifically assessing each strategic site.

4.11 The Viability studies concluded that the Local Plan would not unduly burden the delivery of residential and non-residential development in Guildford borough<sup>4</sup>. As such, sites have been considered *achievable* unless evidence suggests otherwise.

4.12 There are some sites within the borough that have planning permission, but have been discounted from the supply, in accordance with paragraph 73 of the NPPF, on the basis that the Council considers that there is evidence that they are unlikely to be delivered within the next five years, or at all. These sites are identified in the main LAA document at paragraphs 4.5 and 4.6 (see footnotes 5 and 6).

<sup>3</sup> Paragraph: 021. Reference ID: 3-021-20140306.

<sup>4</sup> Based on the assessment of the policy requirements within the Guildford Borough Proposed Submission Local Plan (2016),



## Deliverability Assessment

- 4.13 Information gathered in the assessments of site suitability, availability and achievability has been applied to inform judgements about the likely time-frame for development to be delivered on-site. The advice of developers, local agents and other site promoters has supplemented this evidence where appropriate to inform judgements about lead-in times and annualised build-out rates, particularly for larger sites.

### Deliverable Sites

- 4.14 The NPPF requires that local authorities identify a supply of:  
*specific, deliverable sites for years one to five of the plan period*<sup>5</sup>.
- 4.15 As defined in the NPPF Annex 2: Glossary:  
*To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and 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 (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*
- 4.16 Sites are therefore considered *deliverable* if they were found suitable, achievable and available in accordance with the tests above, and if there was evidence that demonstrated that the proposed development could be delivered within the first five years of the plan period.
- Sites that have an outstanding *Outline* planning permission have been considered *deliverable* where there is clear evidence to demonstrate that homes will be delivered on site within the first five years of the plan period.
  - Sites that have outstanding *detailed* planning permission have been assessed in order to determine whether there is evidence to suggest that the permission will not be delivered within the first five years.
- 4.17 The definition of a *deliverable* site in the NPPF, as outlined in paragraphs 4.15 and 4.16 of this appendix, requires that any site must meet strict tests of evidence in order to be considered *deliverable* within the assessment. The Council has contacted the relevant agent or site promoter for each outstanding planning permission and commenced scheme within the borough that provides a net contribution of 50 or more units, to request updated evidence on the anticipated timescales for the delivery of each scheme. Where expected delivery timescales have been provided, these have been taken forward within the LAA.

<sup>5</sup> NPPF Paragraph 68.

- 4.18 However, in order to account for permissions that no not get built-out, the Council have applied a lapse-rate to the total number of existing planning permissions that have not yet commenced. Over the period covering 1<sup>st</sup> April 2011 – 31<sup>st</sup> March 2018<sup>6</sup>, 6% of the total units on sites granted planning permission were not built-out and the permission expired. Therefore, a 6% reduction has been applied to all outstanding planning permissions that have not yet commenced in order to account for this.
- 4.19 The Council has also contacted the site promoter for any site that has previously been identified as being a realistic candidate for development (sites in Appendix 2) within plan period, in order to request updated evidence on the anticipated delivery of the site. The request for evidence included questions regarding the status of any pre-application engagement, expected planning application timescales, whether a housebuilder had been engaged, and the expected delivery trajectory. As a result of the responses, the expected timeframe for delivery of some sites has changed depending on the evidence provided. This represents the best available and most up to date evidence at the time the LAA was prepared.
- 4.20 Sites that are currently in uses protected by Local Plan policies (for example community or employment uses) have not been considered *deliverable*. The loss of these uses, and therefore the suitability for redevelopment as housing, will need to be demonstrated through the planning application process.

#### Developable Sites

- 4.21 The NPPF also requires that local authorities identify a supply of “*specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan*”<sup>7</sup>.
- 4.22 As defined in the NPPF Annex 2: Glossary:  
*To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.*
- 4.23 Sites have been considered developable if they were found suitable, achievable, and if the site promoter or other evidence indicated that the site could reasonably come forward for development during years 6 – 10 or 11 – 15 of the plan period.

### **Site Capacity Assessment**

#### Housing

- 4.24 The LAA does not establish an appropriate mix of homes for a particular site. Rather, the Strategic Housing Market Assessment (‘SHMA’), other policy requirements, and information regarding potential site constraints, has informed the determination of the appropriate capacity of development for sites. The identified site capacities represent an approximate estimate of an appropriate amount of development based on the best available information.

<sup>6</sup> Planning permissions granted after 1<sup>st</sup> April 2017 and not currently commenced would be considered extant at the base-date of the LAA and therefore would not have expired.

<sup>7</sup> NPPF Paragraph 68.

- 4.25 The estimated quantum of development has been informed by the following considerations:
- Potential land constraints,
  - The planning history of the site,
  - Site assessment/initial masterplanning undertaken by site promoters,
  - The character of the area, and
  - Consideration of the site by planning officers.
- 4.26 The corresponding potential density of development for sites that are considered to be realistic candidates for residential development is set out on the site information sheets in Appendix 2: Realistic Candidates for Development. The density listed represents the gross density figure (number of homes divided by total site area).

#### Economic Development

- 4.27 In the assessment of economic development, information regarding standard ratios of development per employee, as identified in the Employment Land Needs Assessment ('ELNA'), has informed the identification of how much, and what type of employment use, each site could realistically be expected to accommodate.
- 4.28 In the assessment, the estimated quantum of development has been informed by the following considerations:
- Potential land constraints,
  - The planning history of the site,
  - Site assessment/initial masterplanning undertaken by site promoters,
  - The character of the area, and
  - Consideration of the site by planning officers.

The site information sheets (see Appendix 2: Realistic Candidates for Development) show the potential capacity of development.

#### Developable Areas

- 4.29 The developable area of a site does not necessarily represent the gross area of the site as identified by the site boundary. Differences could be caused by issues such as, but not limited to, constraints that cannot be overcome, including the presence of ancient woodland or flooding, the requirement for new infrastructure on the site, the topography or potential contamination of the land. The site assessment proforma in Appendix 2: Realistic Candidates for Development identifies where there are constraints that might impact upon the developable area.

## Stage 6 – Windfall Assessment

### Background

5.1 NPPF Annex 2: Glossary defines ‘windfall sites’ as *sites not specifically identified in the development plan*.

5.2 The NPPF provides that local authorities may include an allowance for windfall sites as part of the anticipated housing supply where justified, as follows:

*Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends<sup>8</sup>.*

5.3 PPG confirms that the windfall allowance may be justified in the five-year supply if the local authority has compelling evidence that they will provide a reliable source of supply, as set out in paragraph 71 of the NPPF<sup>9</sup>.

### Approach

5.4 The delivery of housing on unidentified small sites has been and will continue to be an integral source of housing supply within the borough. The LAA therefore includes an assessment of potential housing supply from windfall sites as outlined below.

5.5 In accordance with PPG advice, the LAA applies a site size threshold of five or more homes (gross). Therefore, the LAA does not identify suitable, available and achievable development sites capable of delivering homes below this threshold. Development on these sites has historically been integral to housing delivery in the borough and will continue to be throughout the plan period. To avoid potential double counting the LAA includes an allowance for windfall sites accommodating fewer than 5 dwellings (gross) only.

### Historic Windfall Delivery

5.6 In calculating an estimated windfall figure, the average net permissions for residential developments on sites of fewer than 5 dwellings (gross) has been determined between the 2010/11 to 2019/20 monitoring periods, as shown in Table 1 below.

Table 1: Approvals (net) on sites fewer than five homes (gross)

Monitoring Year	11 - 12	12 - 13	13 - 14	14 - 15	15 - 16	16 - 17	17 - 18	18 - 19	19 - 20	20 - 21
Permissions	91	87	121	120	81	105	104	117	70	100

5.7 Between the 2010/2011 and 2019/2020 monitoring periods (totalling 10 years), permissions granted for sites on fewer than five homes (gross) totals 996. Over the 10-year period, this provides an average of 100 dwellings per annum.

<sup>8</sup> NPPF Paragraph 71.

<sup>9</sup> Reference ID: 3-24-20140306.

## Future Trends

- 5.8 The NPPF is clear that, where estimating an appropriate windfall allowance, consideration should be given to future trends as well as long-term historic rates.
- 5.9 Changes introduced to the planning system in recent years, such as the expansion of permitted development rights, which allow offices, light industrial and other uses to be converted in to residential use without the need for planning permission, have and will continue to stimulate increased delivery on small windfall sites. Although, for example, office-space is a finite resource that is likely to become relatively scarce as a resource for permitted development to residential, the LAA cannot identify some sites as suitable, available and achievable, which could be converted to residential through permitted development rights, such as office sites in high-risk flood zones. Therefore, there is likely to be additional homes delivered from office sites in these locations, which have not been identified in the LAA.
- 5.10 Further extensions to permitted development rights were introduced on 31 August 2020, in order to stimulate housing development from smaller sites, including;
- the right to extend certain existing buildings upwards to provide new homes<sup>10</sup>,
  - a new right to allow for the demolition of existing commercial buildings and their redevelopment as residential<sup>11</sup>.
- 5.11 Further permitted development rights were introduced on 1 August 2021 which allows certain unused commercial buildings to be converted into residential use. These changes should further stimulate the delivery of windfall sites.
- 5.12 Policy changes were also introduced on the adoption of the Local Plan in April 2019, which could affect the supply of housing likely to come forward on windfall sites. For example, the Local Plan inset some villages from the Green Belt, which provides that additional land may become available for development<sup>12</sup>. Where these sites have met the tests of the LAA outlined above, they have been included. However, there are likely to be some sites in this category that fall under the site size threshold, which could be delivered as windfall.
- 5.13 The LAA identifies a number of suitable sites for development, in addition to many discounted sites. Through the production of the LAA, many sites have been promoted to the Council that fall below the minimum site threshold of 5 units (gross). Many of these are likely to come forward for development in the future, as will many that the LAA process has not been able to identify. There also remains potential for large windfall sites to come forward, as has been the case historically, as circumstances change. Given the uncertainty regarding the scale and timing of any large windfall sites, no allowance has been made from this potential source of supply. However, given the changing policy context set out above, the rationale for including a large site (5+ units) windfall assumption may be appropriate in future LAAs. The

<sup>10</sup> See The Town and Country Planning (General Permitted Development) (England) (Amendment) (No. 2) Order 2020. Available at: <https://www.legislation.gov.uk/ukxi/2020/755/article/1/made>.

<sup>11</sup> See The Town and Country Planning (General Permitted Development) (England) (Amendment) (No. 3) Order 2020. Available at: <https://www.legislation.gov.uk/ukxi/2020/756/contents/made>.

<sup>12</sup> In particular, sites located between the previous settlement boundary and the proposed Green Belt inset boundary.

Council will continue to monitor the delivery of homes on windfall sites to assess whether this approach would be justified in the future.

- 5.14 It is also possible that small site windfall delivery rates could rise above historic rates of delivery. However, the Council's approach of projecting forward historic delivery rates is considered more robust and less open to challenge. Although the sources of windfall sites are likely to change over time, as circumstances, policies and permitted development rights change, windfall sites are likely to continue to provide an integral source of housing supply in Guildford borough over the plan period.

### **Conclusion**

- 5.15 The evidence set out above demonstrates that there is a clear case for the inclusion of a reasonable windfall allowance within the housing supply trajectory. The LAA therefore includes an allowance for 100 homes per year from windfall sites, in accordance with the historic trend, for each year in the 6 – 10 and 11 – 15 year plan periods.
- 5.16 Small sites under the LAA threshold are likely to continue to provide development, in addition to other sources of supply, within the first five years of the plan period. It is therefore appropriate to include the windfall allowance within this period.
- 5.17 However, in order to avoid double-counting with permissions, no windfall allowance is included in the first two years as in order to be delivered within this period they are likely to already have outstanding planning permission. In the third year, the allowance is halved to 50 (rounded down), as it is anticipated that some additional windfall sites delivered in this year are likely to attain permission after the base date of the LAA. In the fourth and fifth years, the full historic average allowance is included as these sites are unlikely to have planning permission currently. This equates to 250 in the first five years of the plan period. In total, 1,250 homes are anticipated to be delivered over the 15 years of the plan period through windfall sites.

### **Rural Exception Sites**

- 6.1 The housing supply trajectory includes an allowance for Rural Exception sites, which takes account of previous trends and likely future delivery. Rural Exception sites have been delivered consistently and are likely to continue to be promoted for development, in particular where extensions to the village were not identified within the Local Plan. In many cases, these sites are likely to be brought forward through neighbourhood plans, where local communities support provision of small-scale development of affordable homes for local needs, such as Puttenham.
- 6.2 Historically, Rural Exception sites have been delivered at an average rate of 9 homes per year in Guildford borough<sup>13</sup>. The LAA Trajectory takes forward a reasonable expectation of 6 homes per year. However, the housing trajectory does not include an allocation for Rural Exception homes within the first two years in order to avoid double-counting, as homes delivered within this period would likely benefit from planning permission at the base date of the LAA.

<sup>13</sup> Data from the 10 year period covering 2005 to 2015 presents an average of 9 units per year.