

Strategic Land Availability Assessment

Methodology



Produced by the

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Strategic Land Availability Assessment (SLAA) Methodology

1. Introduction

- 1.1 This document sets out the methodology to be used by Surrey Heath for preparing a Strategic Land Availability Assessment. A Strategic Land Availability Assessment (SLAA) is the process of gathering together information to create a portfolio of sites which may be considered for future planning purposes.
- 1.2 In order to reflect amendments to the land assessment contained within the current National Planning Practice Guidance (PPG), the resulting documents will now be referred to as a Strategic Land Availability Assessment (SLAA), replacing the previous SHLAA title. This SLAA methodology is written to be in compliance with the advice in the PPG.

The requirement to prepare a SLAA – National Planning Policy

- 1.3 The National Planning Policy Framework (NPPF) 2012 requires Local Planning Authorities (LPAs) to demonstrate that there is a sufficient supply of land in order to deliver future new homes in their Housing Market Area (HMA). Paragraph 161 of the NPPF instructs that LPAs should assess the existing and future supply of land available for economic development and its sufficiency and suitability to meet identified needs.
- 1.4 In March 2018, the Government published a consultation on a draft revised NPPF, which incorporates policy proposals previously consulted on in the Housing White Paper and the Planning for the Right Homes in the Right Places Consultation. The requirement for LPAs to produce an assessment of land availability has been retained in the draft NPPF (2018).
- 1.5 In order to reflect national guidance, a comprehensive assessment of land will be undertaken, enabling sites to be submitted and evaluated for a range of uses in addition to housing. This is in accordance with the PPG, which states,
- 'The NPPF identifies the advantages of carrying out land assessments for housing and economic development as part of the same exercise, in order that sites may be allocated for the use which is most appropriate'.*
- 1.6 In order to reflect the PPG, the SLAA study will consider the availability of land for the following types of uses:

Residential: Use classes falling within C3 (dwelling houses) and C2 (residential institutions). This includes affordable housing; sheltered housing; self and custom build houses; and Gypsies, Travellers and Travelling Showmen pitches for households.

Economic: All A use classes (shops, financial and professional services, food and drink, drinking establishments, hot food takeaways), all B use

classes (business, general industry, storage and distribution), use class C1 (hotels) and use class D2 (assembly and leisure).

Other:

Use classes falling within D1 (non-residential institutions), mixed use developments and Suitable Alternative Natural Greenspace (SANG).

- 1.7 This assessment of land availability is a key element of a Local Plan evidence base and its preparation is an important step in the development of Local Plans. The PPG states that an assessment should:
- identify sites and broad locations with potential for development;
 - assess their development potential;
 - assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

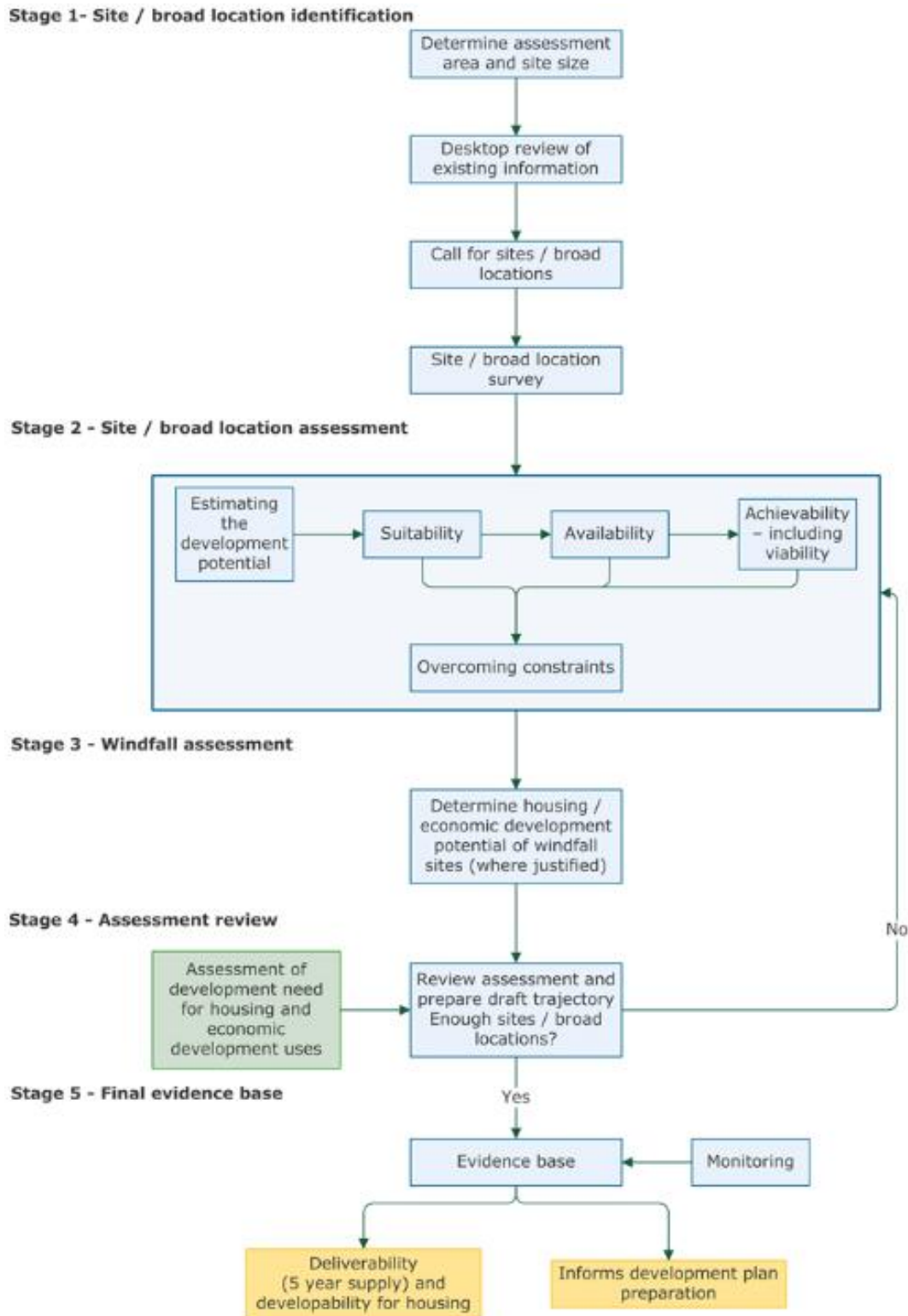
Update to Previous SHLAA Methodologies

- 1.8 Hart District Council, Rushmoor Borough Council and Surrey Heath Borough Council form a single Housing Market Area (HMA). An independent audit of the three authorities' previous methodologies was undertaken by Peter Brett Associates on behalf of the Planning Advisory Service (PAS) in 2015. This recommended the use of a consistent methodology across the HMA for future iterations of the authorities' SLAAs.
- 1.9 In line with the PPG, Surrey Heath undertakes any 'Call for Sites' using an assessment pro forma that was jointly agreed by the three HMA authorities. In undertaking a SLAA, the authorities will aim to actively engage with developers and agents as advised in PPG guidance.

PPG direction on the preparation of a SLAA

- 1.10 In view of the importance of a SLAA in forming part of the evidence base for local plans, the PPG has provided guidance to local authorities on the methodology to be used when preparing a SLAA. For ease of reference, the broad structure of the methodology is set out in Figure 1.1 overleaf. The PPG guidance has been closely followed when devising the specific SLAA methodology set out in this Paper.

Figure 1.1: PPG SLAA preparation flowchart



2. Stage 1 – Identification of sites and broad locations

Geographical area covered by the assessment

- 2.1 It is recognised that the PPG expects SLAAs to be prepared on the basis of the relevant HMA and Functional Economic Area (FEA), both of which comprise Hart, Rushmoor and Surrey Heath Council areas. A methodology regarding the assessment/inclusion of sites has been agreed by the three authorities. By using a common methodology, it will be possible to assimilate readily the information from across the HMA and FEA, extending the picture of housing and economic land supply across the entire area, in line with the 'Duty to Co-operate'. However, due to differences in timescale and practicalities regarding the use of software to compile reports, each authority will be publishing their SLAA separately. This document therefore only considers sites within the Borough of Surrey Heath.

Need for development

- 2.2 In line with the PPG, and to provide an audit of available land, the assessment will identify all qualifying sites and broad locations, regardless of the amount of development needed to meet identified needs.

Site size for assessment

- 2.3 The assessment will consider a range of different site sizes from small-scale sites to opportunities for larger scale developments.
- 2.4 In accordance with the PPG, the assessment will consider all sites capable of delivering five or more dwellings (net) or economic development on sites that are a minimum size of 0.25ha (or 500sqm net additional floorspace) or above. Sites falling below this threshold will be considered windfalls and will not be included in the SLAA other than as part of the windfall allowance in the housing trajectory.

Identifying sites

- 2.5 The first step in identifying sites should be a formal 'Call for Sites', which should be issued to developers, landowners and others with an interest in the future development of land within the HMA and FEA. Furthermore, a proactive desktop review should be undertaken to identify as wide a range as possible of sites and broad locations for housing development.
- 2.6 Sites which have particular policy constraints will be included at this stage of the assessment for the sake of comprehensiveness but these may have constraints that would severely restrict development. Such constraints could include flood risk and Special Protection Areas (SPA). The desktop review will consider the appropriateness of previously defined constraints, but in some cases, sites may simply be inappropriate for development.
- 2.7 The authorities will actively seek to identify sites that may have a part to play in meeting housing or economic needs through the desktop review process as well as sites that have been submitted through the 'Call for Sites' process.

- 2.8 In identifying sites, the following types of sites and sources of data will be drawn upon:

Type of Site	Data sources to be drawn upon
Existing housing allocations and development briefs not yet with planning permission	Development Plans and Neighbourhood Plans
Unimplemented planning permissions	Planning application records
Housing sites that are under construction	Development starts and completions records
Undetermined planning applications	Planning application records
Planning applications that have been refused or withdrawn	Planning application records
Pre-application inquiries (where not confidential)	Planning records
Land in the ownership of the local authority	Local authority records
Surplus and likely to become surplus public sector land. Such bodies will include, but not be limited to, Surrey County Council and the Ministry of Defence.	Duty to Co-operate discussions National register of public sector land
Sites submitted by developers through formal 'Call for Sites'	Formal 'Call for Sites' records
Sites suggested through engagement with local communities	Local Plan consultation events
Vacant and derelict land and buildings	Local authority empty property register
Sites where more productive use of under-utilised facilities can be made (eg. Garage blocks)	Map work
Sites anticipated to meet employment/retail requirements	Enquiries received by the local planning authority and active engagement with the business sector
Sites suitable for SANGs and leisure purposes	Planning records and 'Call for Sites' records
Sites appropriate for a mix of the above uses	Local authority and planning records, as well as 'Call for Sites' records

- 2.9 This comprehensive set of sites will then be assessed against national policies and designations (see table at paragraph 2.11) to establish which have reasonable potential for development and should be included in the site survey.

Excluded sites - residential

- 2.10 Sites and areas with no potential for residential development will be identified at this stage and excluded from further detailed analysis. This also includes residential sites submitted to the Council that are rejected as they are indicated to accommodate less than 5 dwellings. The above types of sites will be identified in the Assessment as 'Excluded sites'.
- 2.11 Within the HMA, the following policy constraints will automatically result in a site being treated as an Excluded Site for the purposes of residential development:

Constraint	Justification
Site lying wholly within, or adversely constrained by, a European Nature Conservation Site (SAC and SPA including the Thames Basin Heaths Special Protection Area)	Protected by European Law
Site lying wholly within, or adversely constrained by, a Site of Special Scientific Interest (SSSI). Sites lying wholly within, or adversely constrained by ancient woodland.	National nature designation
Sites which lay wholly within, or adversely constrained by, the 400m buffer zone of the Thames Basin Heath Special Protection Area (SPA). Suggested uses other than C3 residential will be considered on an individual basis, dependent on the nature of the use proposed and impacts upon the SPA.	Natural England have advised that it is not possible to prevent harm arising from residential development within 400m of the SPA
Site lying wholly within, or adversely constrained by, Flood Zone 3b – functional flood plain	National policy ¹ directs that functional floodplain is not developable for residential uses, including residential care homes, caravans and mobile homes. Other uses that are directed not to be developable in functional floodplain are set out in Planning Practice Guidance note on flood zones.
Sites lying wholly within, or adversely constrained by, the Public Safety Zone for Farnborough Airport	Development in this area would be contrary to Department of Transport Circular 01/10 which seeks to prevent new development in the PSZ, and to reduce it over time as circumstances allow.

Excluded Sites – Economic and other use types

- 2.12 Some of the above constraints will also be applicable where assessing sites that might accommodate economic or uses other than residential. This is likely to be dependent on the specific use type, as well as the location of a site and will therefore be assessed on a case by case basis.

Farnborough Airport Public Safety Zone (PSZ)

- 2.13 Public Safety Zones are areas at either end of a runway, within which development is restricted in order to control the number of people on the ground at risk of death or injury in the event of an aircraft accident on take-off or landing. The Department of Transport Circular 01/2010 (Control of Development in Airport Public Safety Zones) sets out that the basic objective governing the restriction on development near civil airports is that there should be no increase in the number of people living, working or congregating in Public Safety Zones and that, over time, the number should be reduced as circumstances allow.
- 2.14 There are PSZs at either end of the runway at Farnborough Airport. The policy objective set out in Circular 01/2010 therefore applies in this location, and represents an absolute constraint to net new residential development therein. Further information on the PSZs as they relate to Farnborough Airport can be viewed at <http://www.rushmoor.gov.uk/article/2563/Public-Safety-Zones>.

¹ Technical Guidance to the National Planning Policy Framework (March 2012) CLG.

Survey of Sites

2.15 Sites and broad locations that are not excluded will be subject to detailed site surveys, including desktop reviews and site visits, if deemed necessary. The survey will establish and record the following:

- site size boundaries and location;
- current land use and character;
- land uses and character of surrounding area;
- physical constraints;
- potential environmental constraints;
- where relevant, development progress;
- initial assessment of whether the site is suitable for a particular type of use or as a mixed development.

2.16 Once the sites have been surveyed and their details recorded, they will be carried through into Stage 2 of the assessment process as set out in figure 1.1 of the PPG SLAA preparation flowchart.

3. Stage 2 – Site/broad location assessment

- 3.1 Following the identification of possible sites in Stage 1 of the SLAA methodology, sites will then need to be assessed in greater detail to determine their development potential.

Calculating the development potential of sites

- 3.2 The development potential of each of the surveyed sites will be assessed using national planning policies and local plan policies that are consistent with the relevant national policies. Where plans are emerging, these will be taken into account if they are in an advanced stage of preparation.² Where there are locally determined policies on density, these will be applied.
- 3.3 Where plans do not provide a sufficient basis to make a judgement, regard will be had to existing good quality development schemes as the basis for assessment.
- 3.4 The assessment of the capacity of a site will be undertaken on all sites carried through into Stage 2.

Assessing suitability, availability and achievability of sites

- 3.5 The suitability, availability and achievability of sites and broad areas will be assessed so that a judgement can be made in the plan-making context as to whether a site can be considered Deliverable.

Assessing Suitability

- 3.6 The suitability of the identified use or mix of uses of a particular site will be assessed, including consideration of the types of development that may meet the needs of the community. Potential uses for sites include but are not limited to: market housing, private rented, starter homes, affordable housing, self-build plots, Gypsy and Traveller pitches, Travelling Showpeople plots, housing for older people, or for economic development, SANG and leisure uses.
- 3.7 Assessing the suitability of a site will be guided by:
- Up-to-date policies in the adopted development plan, advanced emerging plan policy and national policy;
 - Market requirements in the HMA/FEA;
 - Physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
 - Potential impacts including the effect on landscape features and heritage conservation;
 - Contribution to regeneration priority areas;
 - Environmental amenity impacts.
- 3.8 Housing sites allocated in development plans, or with planning permission for residential development will be considered suitable for housing development.

² In this context ‘advanced plan policies’ are taken to be those in pre-submission documents.

Assessing Availability

- 3.9 All sites will be assessed as to whether they are genuinely available i.e. there are no legal or ownership problems, such as ransom strips, multiple ownerships, tenancies or operational requirements of land owners. Initially, these points will be addressed where information has been provided. Following receipt of this information, if required, checks that are more detailed will be undertaken in order to establish the availability of the site.

Assessing Achievability

- 3.10 A site will be considered achievable where there is a reasonable prospect that development can take place at a particular point in time. This will involve a high-level judgement about the economic viability of a site and the capacity of the developer to complete the housing over a certain period.
- 3.11 The following factors will be considered when assessing a site's achievability for development:
- Likelihood of the site coming forward for the proposed use;
 - Whether there are any significant abnormal development costs (e.g. contamination remediation, demolition, access etc.);
 - Possible requirements for significant infrastructure investment to ensure that a site is capable of sustaining new development;
 - Issues that may influence the economic viability or timing of the development.

Dealing with identified constraints and timescales

- 3.12 Where constraints have been identified, the assessment will consider what action would be needed to remove them, along with when and how this could be undertaken and the likelihood of sites/broad locations being delivered.
- 3.13 Information on suitability, availability, achievability and constraints will be used to assess the timescale within which each site is capable of development.

4. Stage 3 – Windfalls and C2 Uses

Windfall Assessment

- 4.1 The term “windfall” refers to sites which have not been previously identified. Such sites are often first encountered upon submission of a planning application or during pre-application discussions.
- 4.2 The NPPF and PPG advise that, where justified, windfall sites can contribute towards housing supply. Paragraph 48 of the NPPF (2012) confirms that where compelling evidence demonstrates the contribution that windfall sites make to housing supply, an allowance for windfall sites can be made within a LPA’s five-year supply. This has been retained in the draft revised NPPF (2018). The PPG states that broad locations identified in years 6-15 could include a windfall allowance based on geographical area.
- 4.3 As instructed in the NPPF, windfall allowances should be as realistic as possible, justified by compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. A detailed methodology used for calculating Surrey Heath’s windfall allowance is set out in Annex A, at the end of this SLAA Methodology.

Prior Notifications

- 4.5 Under the General Permitted Development Order³ (GPDO), office to residential conversions may not require planning permission, but rather, prior approval. An amendment⁴ to the Order in April 2016 has made permanent the existing temporary right to change a building used as an office into residential use and allows an extension of time to May 2019 for notifications already granted but not completed. Dwellings arising from this source have the potential to contribute to the supply of housing. Therefore, an allowance will also be included that accounts for prior notifications.

C2 uses

- 4.6 The PPG advises that housing for older people, including C2 uses, should be counted against housing requirements. This will only be directly relevant where the need for C2 uses has been identified through a SHMA or through another local assessment of housing need. There may also be indirect effects on meeting local housing requirements as a result of people vacating general needs (C3) accommodation to move into new C2 accommodation.

³ The Town and Country (General Permitted Development) (England) Order 2015

⁴ The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2016

5. Stage 4 – Assessment Review

Producing an indicative housing trajectory

- 5.1 Once the sites and broad locations have been assessed, the development potential of all housing sites in the Borough will be collated to produce an indicative trajectory and determine whether housing needs can be met and whether or not there is a 5 year housing land supply. The 5 year housing supply and trajectories will be assessed against the housing requirement of the relevant Council's Local Plan. Where an authority's housing policies are out of date, the most recently derived figures from the objectively assessed housing needs (OAHN) assessment for the specific district will be used. This is consistent with the Government's PPG regarding the assessment of a five-year housing land supply.

Deliverable and Developable Sites

Identifying Deliverable Sites

- 5.2 Paragraph 47 of the NPPF (2012) requires LPAs to identify and update annually a supply of specific Deliverable sites sufficient to provide five years' worth of housing against their housing requirements. This requirement is retained in the draft NPPF (2018). To be considered Deliverable, a site must:

- Be available now;
- Offer a suitable location for development now;
- Be achievable with a realistic prospect that housing will be delivered on the site within 5 years and in particular that development of the site is viable.

A **Deliverable site** is thus one that **is available, suitable and achievable now and capable of being implemented within 5 years**. This could include sites that:

- are allocated for housing in the development plan;
- have planning permission unless there is clear evidence that schemes will not be implemented within five years;
- are not allocated within a development plan and are without planning permission but have no significant constraints to overcome.

- 5.3 Deliverable SLAA housing sites for the next 0-5 years will be identified in the SLAA. Robust, up-to-date evidence in the form of mapping and detailed suitability, availability and achievability information in relation to these sites will be presented. Judgements on deliverability will be set out clearly and transparently. Details of the Deliverable SLAA sites will be set out in the SLAA report.

- 5.4 The Deliverable sites will form the basis of the 5 year supply, along with a windfall allowance.

Identifying Developable Sites

- 5.5 Paragraph 47 of the NPPF (2012) expects LPAs to identify and update annually a supply of specific Developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15. This requirement is retained in the draft NPPF (2018). To be considered Developable, a site should:

- Be in a suitable location for housing development;
 - Have a reasonable prospect that the site is available; and
 - Practicably be viable for development at the point envisaged.
- 5.6 Developable sites for the next 6-10 years will be identified in the SLAA. Again, robust, up-to-date evidence in the form of mapping and information on the suitability, availability and achievability information of these sites and broad locations will be presented. Judgements will be set out clearly and transparently. Where it is possible to identify sites for the years 11-15, these will also be presented in the SLAA report.
- 5.7 The Developable sites will form the basis of the 6-15 year supply, along with a windfall allowance.

Broad locations for growth

- 5.8 The SLAA will identify broad locations with potential for future housing growth. These areas are seen as having potential to deliver housing later on in the plan period. Where broad locations have been identified via desk-top studies and community consultation events, the degree of certainty and detail that can be attached to them will be limited. The broad locations will be recorded in the SLAA as 'Not Currently Developable'. Information collected and recorded in relation to them is unlikely to be specific or detailed.
- 5.9 Where 1 or more specific sites within an identified broad location for growth are submitted as part of a 'Call for Sites' exercise, these will be assessed as individual sites, in accordance with Stage 2 of this methodology. As a result, such sites will be individually identified in the SLAA, based on their specific suitability, availability and achievability.

Dealing with situations where there are insufficient sites to meet objectively assessed housing need

- 5.10 The assessment may reveal that there are insufficient sites/broad locations to meet the relevant housing requirements or objectively assessed housing needs. In such cases, the assessment will be re-appraised as set out in Stage 2 of Figure 1.1, *PPG SLAA preparation flowchart*, as outlined below:
- Site capacity on Deliverable and Developable sites will be re-appraised;
 - The possibility of changing assumptions on density and the developable area of sites will be considered;
 - The phasing of sites will also be reassessed.

6. Stage 5 – Final Evidence Base

Core outputs

- 6.1 The following core outputs will be produced as part of the assessment and presented in the main report:
- A list of all sites and broad locations identified through the SLAA process indicating whether they are considered to be Deliverable, Developable, Not Currently Developable, or Excluded;
 - A referenced borough wide map showing the location of all the identified sites;
 - Assessment of the suitability, availability and achievability of the sites and broad locations;
 - Maps and detailed assessments of sites considered realistic candidates for development – i.e. Deliverable and Developable sites;
 - For transparency, Surrey Heath will also include maps and detailed assessments for sites that are ‘Not Currently developable’ and ‘Excluded’ sites that have been excluded for reasons other than their submission indicating less than 5 (net) dwellings, or the reasons listed in the major constraints table at paragraph 2.11;
 - An assessment of the potential type and quantity of development that could be delivered on each site/broad location, setting out how any barriers to delivery could be overcome and broadly, when;
 - An indicative trajectory of anticipated development and consideration of associated risks;
 - The current five year supply situation in relation to the appropriate housing requirements or the most up-to-date OAHN (if applicable).

Five year Housing Supply

- 6.2 Where there is an adopted local plan that contains up-to-date housing requirement policies, this will be used as a starting point for calculating the 5 year supply. In instances where the evidence has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered. The weight given to these full assessments of need should take account of the fact they have not been tested or moderated against relevant constraints.

Updating the Assessment

- 6.3 The NPPF (2012) and draft NPPF (2018) expect LPAs to identify and update annually a supply of specific Deliverable sites sufficient to provide five years’ worth of housing. As part of this, LPAs are required to consider both the delivery of sites against the forecast trajectory and also the deliverability of all the sites in the five year supply. Following their publication, it is not necessary for the assessments to be updated for a full twelve months unless significant new evidence comes to light. This approach will help establish a strong position for demonstrating a robust supply of sites, and help determine whether the authority can demonstrate a 5 year housing land supply.

Monitoring

6.4 The following housing supply information will be recorded when monitoring:

- Progress with delivery of development on allocated and sites with planning permission;
- Submitted and approved planning applications on sites and broad locations identified in the assessment;
- Progress made on removing constraints on development and whether a site is now considered to be Deliverable or Developable;
- New unforeseen constraints which have emerged and which mean a site is now non-Deliverable or Developable, and how these could be addressed;
- Whether the windfall allowance is coming forward as expected, or may need to be adjusted.

Glossary

Advanced emerging plans	Emerging plans that are at pre-submission stage
Deliverable sites	A site that is available, suitable and achievable now and capable of being implemented within 5 years.
Developable sites	Sites in a suitable location for housing development with a reasonable prospect that it is available and could be viably developed at some point in the period in 6 – 15 years.
Not Currently Developable sites	Sites not subject to the absolute constraints, but where development would be contrary to current policy and thus they cannot be considered suitable in the 0 - 15 year, period at this time. In addition, broad locations for growth and sites where it is informed that availability is unlikely within 0 - 15 years will be recorded in the SLAA as 'Not Currently Developable'.
Excluded sites	Sites lying wholly within a European Nature Conservation Site, SSSI, the 400m buffer zone of the Thames Basin Heath Special Protection Area, Flood Zone 3b, Ancient Woodland, or the Public Safety Zone for Farnborough Airport. Sites which are on non PDL in the Green Belt which are not submitted for inclusion as rural exception sites. Residential sites submitted to the Council for a figure that is lower than 5 dwellings. Sites that upon further assessment are subject to other insurmountable constraints.
HMA	Housing Market Area
NPPF (2012)	National Planning Policy Framework (2012)
Draft NPPF (2018)	Draft revised National Planning Policy Framework (2018)
PPG	National Planning Practice Guidance
PDL	Previously Developed Land
PN	Prior Approval Notification
SHMA	Strategic Housing Market Assessment
SHLAA	Strategic Housing Land Availability Assessment
SLAA	Strategic Land Availability Assessment

Annex A – Methodology for Calculating Surrey Heath’s Windfall Allowance

Introduction

The NPPF (2012) indicates that local authorities may make an allowance for windfall sites in the 5 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. Any allowance should be realistic, having regard to the Strategic Land Availability Assessment, historic windfall delivery rates and expected future trends. Residential gardens should not be included in the allowance (Paragraph 48). Provision for this allowance has been carried forward in the draft revised NPPF (2018). The draft NPPF (2018) is not explicit in the exclusion of residential garden development. However, until the updated NPPF is finalised, this windfall allowance will continue to exclude residential garden development.

The National Planning Practice Guidance (PPG) states that “local planning authorities have the ability to identify broad locations in years 6-15 which could include a windfall allowance based on a geographical area”.

The National Planning Policy Framework (NPPF), 2012 defines windfall sites as “Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available”. The draft NPPF (2018) defines windfall sites as “Sites not specifically identified in the development plan.”

Calculating Surrey Heath’s Windfall Allowance

Windfalls are unanticipated sites that were not identified in the previous SLAA supply. Most windfalls are small or involve the conversion of existing buildings. However larger sites can be classed as windfalls if they have not been previously identified in the SLAA.

Past windfall rates will be obtained using internally collected housing completion data. This includes information on the location and type of development as well as the detailed planning application description. This allows a breakdown by area and development type.

As the SLAA focuses on identifying sites which will deliver 5 or more net units, sites delivering fewer than this number would not be included in the SLAA and as such would not have been identified in the local plan process. As windfall sites are by definition, those sites that have not been identified in the local plan process, the pool of possible windfall completions will include all those units completed on such small sites. From 2000 – 2018 all sites delivering fewer than 5 net units will therefore be considered as potential windfalls (excluding those sites falling on residential garden land, as set out under *Exclusions* below).

From 2008 when the first Strategic Housing Land Availability Assessment (SHLAA) was published, it will also be possible to identify those larger (5+ net unit) sites which came forward but had not been previously identified as part of the local plan process. In summary, in assessing an appropriate level for the windfall allowance, the Council will take into account housing completions on the following:

- From 2000 - 2018: all sites of fewer than 5 net units;
- From 2008 onwards: sites of 5 or more net units not identified through previous versions of the SLAA;

- From 2008 onwards: Sites of 5 or more net units included in the SLAA solely on the basis of receiving planning permission and therefore not previously identified prior to the permission being granted.

Exclusions

In accordance with the NPPF (2012), the windfall allowance will discount units that are on residential gardens. The following are considered to be development on residential gardens and will be excluded from the historic windfall figures:

- Developments retaining an existing dwelling and adding new units in the surrounding garden space;
- Developments which demolished existing dwelling/s and replaced them with an increased number of units on a notably larger footprint than the previous building(s).

When past windfalls have been established, the figures will be analysed for trends that are likely to continue in the years ahead. Large “one-off” type past windfall development⁵ will be omitted from the trend calculations to avoid distorting the projections. Unexpected net losses are also classed as windfalls and will therefore be deducted from the windfall total.

As any windfall sites coming forward would not have planning permission at the time of the base date of the SLAA, a 12 month lead in time will be allowed for such sites to appear in the housing completions data. Therefore no windfall allowance will be included in the year 1 figures.

The windfall completion rate will be regularly reviewed and the allowance adjusted accordingly.

⁵ For the purposes of the methodology, large “one-off” type windfalls will include all those of 10 units or more.