

Ashford Borough Council

**Strategic Housing  
and Employment Land  
Availability Assessment  
(SHELAA) 2017/18**



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## Important Site Assessment Disclaimer

The Ashford Borough Council SHELAA 2016/17 forms part of the evidence base for the Local Plan to 2030. It is a 'snapshot' of site information at the time of publication and will change on a regular basis as units are built and planning permissions are granted.

The SHELAA only identifies land that MAY have future potential for development. It does not allocate sites to be developed and identification of sites within this document does not imply that planning permission will be granted on them. The report provides a broad indication of suitable sites and does not identify all sites that may be delivered.

The site assessments contained in this SHELAA have not been considered by Council Members, or been subject to public consultation. All information contained in the assessments is accurate at the time it was carried out but may be subject to change.

Full detailed assessments of potential sites for allocation within the Local Plan will be carried out through the Sustainability Appraisal process, which will be subject to public consultation during the draft Local Plan 2030 consultation.

The inclusion of a potential housing, employment or other site in this document does not preclude the site from being submitted as a planning application or developed for other purposes, or confirm that they will receive planning consent.

# EXECUTIVE SUMMARY

This Strategic Housing and Employment Land Availability Assessment (SHELAA) assesses the individual and combined potential capacity of a pool of sites to accommodate additional dwellings and businesses over the period of the emerging Local Plan to 2030. The aim is to identify sufficient sites to meet our Objectively Assessed Housing Need (found in the SHMA<sup>1</sup>), and government guidance on land availability assessment. The approach has been to cast the net wide in identifying a pool of sites and to take a hard look at them notwithstanding that a significant number of sites involve a degree of conflict with established local planning policies.

The SHELAA itself does not allocate land for housing, and an indication that a site may have development potential does not signify that planning consent would be granted for such development. It will be for the Local Plan making process (drawing on the information from the SHELAA) to determine which sites are appropriate to allocate for development.

Completions data over the last 10 years show a strong and consistent rate of windfall housing delivery with an average of 167 dwellings completed each year. It is considered to be highly likely that this consistent rate of delivery will continue and, indeed, may well be exceeded. Based on these factors a yearly rate of 100 dwellings per year has been estimated which is well below the historic trend for windfall completions.

The following tables summarise the SHELAA's conclusions regarding potential housing capacity within four 5 year time bands over the period to 2030 and beyond. An indicative "trajectory" illustrating the amount of housing that can be expected to be provided and at what point over the time period is found in appendix 9 of the document.

**Potential Housing Capacity - Summary table**

Source of housing potential	0-5 Years	6-10 Years	11+ Years
Assessed Identified sites	6241 (including extant large windfall)	5174	8893
Windfall Assumption	509 (small windfall)	500	--
<b>Total</b>	<b>6750</b>	<b>5674</b>	<b>8893</b>

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<sup>1</sup> Strategic Housing Market Assessment – <http://www.ashford.gov.uk/local-plan-2030-evidence-base>

**CONCLUSION: The data indicates that potential supply is sufficient to meet the target housing requirement and provide employment spaces across the Plan period**

## INTRODUCTION

The Local Plan 2030 is required to identify the planned location of new housing and employment, which must contribute to the achievement of sustainable development. The strategy for site allocation must be informed by evidence regarding the opportunities and options for the location of future housing and employment land provision. It is the purpose of this Strategic Housing and Employment Land Availability Assessment (SHELAA) to assess the potential availability of land for new development in Ashford to provide this essential baseline information.

In 2014, to determine the overall strategy for housing, the Council commissioned specialist consultants to prepare an NPPF- compliant Strategic Housing Market Assessment (SHMA). This work was updated in 2015 and then again in 2017 to take account of new and more up to date demographic projection data. The 2017 SHMA identifies a total OAN for the Borough of 15,675 dwellings between 2011-2030. This figure includes a 5% uplift to accommodate 'market signals' as recommended through the PPG;

It is the role of the Local Plan 2030, and the detailed Sustainability Appraisal undertaken to support it, to determine which sites are appropriate to be allocated for development, taking into account the overall strategy, higher level policy, plan targets and competing uses. It is therefore important to note that even if a site is assessed as deliverable or developable for housing in the SHELAA, this does not signify that the site will be allocated for such use in the Local Plan or that planning permission for residential development will or might be granted.

This 2016/2017 Strategic Housing and Employment Land Availability Assessment (SHELAA) replaces the 2015/16 SHELAA published in 2016 to support the initial consultation on the Regulation 19 draft Local Plan to 2030. It contains assessments on housing and employment sites across the Ashford Borough to identify potential future locations for development.

This report details the overall approach to carrying out the SHELAA, followed by details of the site assessments carried out. This results in the identification of a future supply of land in the Borough that may be suitable and available for housing and economic development uses over the Local Plan to 2030 period and beyond.

It is important to note that a SHELAA can only provide a 'snapshot' of the land availability at the time it is produced and is subject to constant change as units are completed, applications are granted and new sites become available. However, it is important that the SHELAA is kept up to date with regards to ongoing land supply, and the Council intend to update this report on at least an annual basis, with regards to completions and new sites identified.

## NATIONAL GUIDANCE

In 2012 there were significant changes to national guidance regarding land assessments with the introduction of the *National Planning Policy Framework (NPPF)*, and then subsequent *2013 National Planning Practice Guidance (NPPG) – Assessment of Land Availability*. This Government guidance requires that Local Plans be based on adequate and up to date evidence and maintains the requirement for local planning authorities to prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and likely economic viability of land to meet identified need for housing over their plan period.

The NPPF recommends that the Employment Assessment is carried out at the same time and integrated to take full account of market and economic signals across the borough, and sites can be allocated in the Local Plan for the use that is most appropriate. We have taken this recommendation and have included employment assessments within this report.

### The NPPG directs that the primary role of the SHELAA is to:

- identify sites and broad locations with potential for development;
- assess their development potential; and
- assess their suitability for development and the likelihood of development coming forward (the availability and achievability)

The SHELAA assessment is a key part of the evidence base required to underpin policies in the Local Plan for housing and economic development. The site assessments contained within the SHELAA allow the council to plan proactively in choosing sites with potential to go forward to allocation in the Local Plan 2030 whilst meeting objectively assessed needs.

However, not all the sites considered are suitable for development due to policy constraints or viability. It is the role of this assessment process to provide a range of sites that have potential to meet Ashford identified development needs, outlined in the Strategic Housing Market Assessment (SHMA).

Therefore, the aim for this SHELAA is to identify as many sites with housing and employment potential, in and around as many settlements as possible in the borough.

Guidance states that as a minimum, it should identify sufficient specific sites to meet the development targets of the Local Plan to 2030. Where this is not possible, a review should be undertaken to assess if any constraints can be addressed on individual sites. All consultees specified in the Duty to Cooperate have been notified of the SHELAA production, the geographic coverage of the report and the methodology of the assessments.

## STUDY AREA

The Land Availability PPG states that the SHELAA should cover the relevant housing market area. This is described as a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work.

The 2014 Strategic Housing Market Assessment indicated that Ashford is a highly self-contained housing market area and this has not changed in the more recent updates. The geographical coverage of this SHELAA therefore only covers the area of Ashford Borough.

The assessment will identify as many sites as possible and will not just take into account the amount of development required for the Local Plan 2030. This allows us to provide a complete audit of available land. However, this assessment will enable the identification of sites and locations that may be suitable for allocation in the Local Plan 2030 and require consideration through the Sustainability Appraisal<sup>2</sup>.

## HOUSING LAND SUPPLY AND WINDFALLS

Another key role of the SHELAA is to assist the Council in being able to demonstrate a 'deliverable' 5 year land supply of housing, with a further five year supply of 'developable' sites, in accordance with Paragraph 47 of the NPPF. It is therefore important that there are accurate details about the deliverability and availability of the sites assessed.

The NPPF and NPPG indicates that a 'windfall' allowance can be justified in the five-year supply if the Local Planning Authority has compelling evidence of past consistent windfall completions.

Completions data over the last 10 years show a strong and consistent rate of windfall housing delivery with an average of 167 dwellings completed each year. It is considered to be highly likely that this consistent rate of delivery will continue and, indeed may well be exceeded. There are a number of reasons for this - the various extensions to permitted development rights via the prior approval process to allow conversions on various property types to residential use; the NPPF's presumption in favour of sustainable development;

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<sup>2</sup> <http://www.ashford.gov.uk/local-plan-2030-evidence-base>

and the proposed Local Plan 2030 residential windfall policy (as revised in June 2017) which is more permissive than the equivalent policy in previous Local Plans.

Based on these factors, a conservative assumption of an additional 900 units will be delivered between 2021 and 2030, at an annual rate of 100 dwellings per year, well below the historic trends for windfall completions even though this historic trend is likely to be exceeded.

## SHELAA METHODOLOGY

The National Planning Practice Guidance – Assessment of Land Availability sets out the methodology for carrying out a SHELAA:

- Stage 1:** *Identification of sites and broad locations*
- Stage 2:** *Site/broad location assessments and screening*
- Stage 3:** *Determining other sources of capacity & potential of windfall sites*
- Stage 4:** *Assessment review & Final Evidence Base  
(Final trajectory of sites)*

**Important Site Assessment Disclaimer**



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The SHELAA only identifies land that MAY have future potential for development. It does not allocate sites to be developed and identification of sites within this document does not imply that planning permission will be granted on them. The report provides a broad indication of suitable sites and does not identify all sites that may be delivered.

The site assessments contained in this SHELAA have not been considered by Council Members, or been subject to public consultation. All information contained in the assessments is accurate at the time it was carried out but may be subject to change.

Full assessments of potential sites for allocation within the Local Plan will be carried out through the Sustainability Appraisal process, which will be subject to public consultation during the Local Plan 2030 consultation.

The inclusion of a potential housing, employment or other site in this document does not preclude the site from being submitted as a planning application or developed for other purposes, but does not indicate any favourable decision on planning applications would be made.

## STAGE 1: IDENTIFICATION OF SITES AND BROAD LOCATIONS

### Determining Size of Sites

#### *Site Size Threshold*

The guidance states that all sites that are capable of delivering 5 dwellings or employment sites of 0.25ha should be assessed. The NPPG – Land Availability Assessments was issued after the Council had issued a 'Call for Sites'. During this call for sites we required within the Ashford Urban Area, given the site opportunities, the minimum site size threshold of 0.4ha. A lower site size threshold of 0.2ha was requested in the rural areas or any sites able to accommodate 10 dwellings or more. This threshold was used in our 2009 SHLAA and using the information on the supply of sites in the past and the type of site opportunities likely to come forward during the SHELAA period.

However, some sites were submitted below the requested size and these have been accepted and assessed as part of this SHELAA, in addition to smaller sites from other sources.

## **Site and Broad Location Sources**

### ***2009 SHLAA Sites and Urban Capacity Study***

The 2009 SHLAA included sites from various sources, including an Urban Capacity Study carried out by consultants in 2006. This Study assessed all previously developed land in the urban areas and assessed the possible development capacity of the site. These sites along with other sites included in the 2009 SHLAA that still have development potential have been re-assessed in this SHELAA.

### ***Existing Allocations***

All existing site allocations and identified Broad Locations from the adopted Core Strategy 2008 and Development Plan Documents have been included in the SHELAA.

### ***Call for Sites 2013/14***

A call for sites was undertaken for a three month period from 27th June to 27th September 2013. This call for sites requested landowners to submit sites across the borough that might be suitable for development in the future. As well as for housing and employment or mixed use, submitters were able to propose sites for gypsy and travellers sites, leisure, visitor, tourism or any other uses. Invitations to re-submit sites were sent to all previous submitters and agents and it was advertised in the local press and council website. Respondents were required to complete a standard form which requested detailed information about the site, constraints, proposed use and scale of development and location.

### ***Informal Submissions***

After the official call for sites ended we received a number of additional site submissions from landowners throughout 2014. These have been included in the SHELAA as 'informal' submissions but have been assessed using the same criteria.

### ***Previous Site Submissions***

In 2007 the council held a 'call for sites' for the rural area of the borough for sites to be included in the Tenterden and Rural Sites DPD. These sites (regardless of if they have been resubmitted) have been included in the SHELAA and re-assessed. Many of these sites were not included in the 2009 SHLAA as they fell outside the rural development areas (Tier 1-3 villages) identified in the Core Strategy 2008, but have been included in this borough wide SHELAA.

### ***Council-Owned Land***

In February 2010, the council commissioned DHA Planning to undertake an assessment of all the ABC owned land and its potential for development. The sites were categorised as A – Short Term Potential to D – No Potential. Sites that scored A and B in the survey, have been included in the SHELAA to be assessed further, regardless of site size.

### **Surplus Public Sector Land**

Sites in the borough that were on the National Register of Public Sector Land have been included in the assessments. In addition to this, other public bodies active in the borough were written to and asked to submit any vacant land in their ownership. These included the utility companies (Water, Gas) Emergency Service organisations (Fire Service, Police, and NHS) and Network Rail.

### **Vacant and Derelict Land**

We have identified all land within the borough that is vacant and derelict by consulting the National Land Use Database (NLUD). In addition to this local estate agents have been written to and asked for assistance to identify any other vacant land they are aware of to be included in the SHELAA assessments.

### **Extant Planning Permissions**

Sites with planning permission for housing or employment that have not yet commenced or are under construction (for 5 dwellings or 0.25ha employment) have been included within this assessment.

Extant housing sites of less than 5 dwellings have not been assessed as part of the SHELAA but have been considered as contributing to the land supply. ***This was updated in April 2017, taking into account updated completion and extant information.*** These are shown separately in Appendix 8

### **Refused/Withdrawn Planning Applications**

Sites with planning permission that was refused or withdrawn since 2011 that could accommodate housing or employment for 5 dwellings or 0.25ha employment have been included within this assessment.

### **Employment Land Review**

The Ashford Employment Land Review (ELR) was commissioned by Ashford Borough Council and SEEDA. Part of this work included an assessment of the characteristics and quality of existing and allocated employment sites in the borough. The assessment was based on sites over 0.25 ha, each inspected and assessed. This considered each site's suitability for employment use, against the criteria set which is similar to a land availability assessment. These have been reassessed as part of this SHELAA.

### **Other Sources and Desktop Review**

In addition to the above sources we have also undertaken a desktop review of the borough using aerial photography and local knowledge to identify any other sites or broad locations that may have development potential. Sites have also been identified from persons other than landowners. These have been included within the SHELAA.

## Site Numbering

Each individual site has been given a unique reference number relevant to the ward in which they are located. Detail of the areas each ward covers and maps of each site can be found in Appendix 10.

## STAGE 2: SITE ASSESSMENTS

### Site Assessment Process

All sites have been assessed for development potential using the same criteria. The consistency of information has been assured through the use of a standard template. All sites have been mapped on a GIS map layer for use in the site survey and to highlight constraints to development such as heritage or environmental designations.

Opportunities and any possible constraints to development for each site are identified and recorded through a desk top exercise or a site visit.

All data collected has been entered into a SHELAA database, and can be updated and reported on annually or as information is updated or amended. If there are any concerns about the accuracy contained within the SHELAA, representations about its content can be submitted during the public consultation stages of the Local Plan to 2030.

### Assessing When and Whether Sites are Likely to be Developed

The SHELAA survey must include an assessment of whether a site is deliverable and developable as set out in NPPF (paragraph 47) and provide the information on which the judgement is made as to whether a site can be considered for development.

- **deliverable** – a site must be available now, offer a suitable location for development now, and be achievable with a realistic prospect that development will be delivered on the site within five years and in particular that development of the site is viable.
- **developable** – a site should be in a suitable location for the proposed development, and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

As set out in more detail in the NPPG, all sites have been assessed for their Suitability, Availability and Achievability. This includes an assessment of economic viability and deliverability within the plan period, or the 5 years for land supply calculations.

## SCREENING CRITERIA OF SITES

We have carried out the screening assessments in three parts, and eliminating sites at each stage to result in the most deliverable, developable and suitable sites remaining for inclusion in the land supply, and taken forward to full assessment as part of the Sustainability Appraisal of the Local Plan 2030.

### Screening Part 1 – Assessment of Availability, Site Size and Ecological Designations

#### Available Sites

Available sites are those that have been put forward for development by a landowner or agent and there is confidence that there are no legal ownership issues such as ransom strips or unresolved multiple ownership. The call for sites undertaken in July-September 2013 enables this information to be as accurate with regards to submissions. Previous site submitters (in 2007) were notified of the new 2013 'call for sites' and those sites that were not re-submitted were not recorded as 'available' sites.

Where potential problems are identified with availability, an assessment has been made on how and when this could be overcome. **Sites that were not available were removed at Part 1 screening.**

#### Site Size

**Sites that were below the size threshold for allocation for housing (5 dwellings) were removed at Part 1 screening.**

*Note that smaller windfall applications have not been assessed as a SHELAA site but may contribute to the 5 year housing land supply calculations.*

#### Ecology Designations

The Land Availability Assessment NPPG states that the sites should be assessed against national policies and local designations. The NPPF Chapter 11 requires the protection of the natural and local environment and states that plans should allocate land with the least environmental or amenity value, particularly International, national and locally designated sites of importance for biodiversity. **Therefore sites in the borough within the ecological and landscape categories below will not pass through Part 1 screening of the assessment process:**

- Special Areas of Conservation (SACs)
- National Nature Reserves (NNR)
- Sites of Special Scientific Interest (SSSI)
- Ancient Woodland (AW)
- Local Wildlife Sites (LWS)

## Screening Part 2 – Location and Physical Limitations of the Site and the Impact on Landscape, Nature and Heritage

Part 2 of the assessment process will assess the sites in greater detail than Part 1, particularly to look at the factors that impact on the overall suitability of a site such as:

- Site Location and proximity to a settlement
- Physical limitations or problems such as access, infrastructure, flood risk and contamination
- Potential impacts including the effect on landscape<sup>3</sup>, nature and heritage
- Environmental/amenity impacts experienced by potential occupiers and/or neighbouring residents
- Local designations such as open spaces or Green Corridor

### *Site Location*

A site has been considered suitable for development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities. This includes a variety of development including market housing, affordable housing, and economic uses.

Suitability of sites is also determined by assessing the location against the development plan or emerging development plan. **Sites that were assessed to be within the countryside, or too far removed from a settlement to contribute to a sustainable community have been removed at Part 2 screening.**

### *Access and Infrastructure*

Access to a site and highway network capacity is an important aspect to site viability. Within Ashford some locations are particularly constrained by the M20 junctions at the present time.

The access constraint considers direct access between a site and the highway network. It does not consider the impact of the additional traffic on the highway network and whether this would cause unacceptable levels of congestion. This clearly would need to be the subject of detailed assessment in each individual case.

Access to community facilities and services such as GPs, schools, local shops, bus routes and railway stations are also very critical to determining the suitability of a site and the creation of a sustainable development.

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<sup>3</sup> In particular, the two Areas of Outstanding Natural Beauty (AONB) within the Borough.

These issues will be assessed and an assessment to whether new infrastructure provision included with new development could resolve the constraint will be undertaken. **Those sites that are constrained by these physical limitations, and cannot be resolved, will be removed at Part 2 screening.**

### ***Flood Risk***

Flood risk is regarded as a locally important issue. Sites which fall within flood risk zones 3a (high probability) and 3b (functional floodplain) have been taken to Part b assessment. **If at this stage the flooding is assessed as unable to be mitigated the site will be removed from the process for being unsuitable.**

### ***Contamination***

A desktop assessment using information about site contamination will be undertaken at this stage, and site removed if issues are highlighted which cannot be resolved.

### ***Open Spaces & Green Corridor***

Formal public open space, playing fields, leisure buildings on public open space and allotments that are used for recreation and leisure are important to creating a vibrant, sustainable community. In Ashford, there is a local Green Corridor designation that runs from the Town Centre, through urban areas and into the countryside in a connected network of river and green spaces of biodiversity and movement importance. Sites identified as public open space are protected by policies<sup>4</sup> from development proposals and sites within the 'Green Corridor' are protected by development plan policies. **Development of sites that would result in the loss of any of these important areas will be removed from assessment at this part of screening.**

### ***AONB and Landscape***

The borough contains two Areas of Outstanding Natural Beauty (AONB), the High Weald and the Kent Downs. AONB's have the highest status of protection through the NPPF (paragraph 115) in relation to landscape and scenic beauty.

Being located in, or close to an AONB does not automatically remove a site from the assessment process, however it is a major constraint to development and potential impacts on the AONB setting and character will be assessed in great detail during the assessment stage.

Other site considerations including impacts on landscape character and the setting and built form of a settlement will be assessed at this stage. It is likely that sites in this category will remain in the process for full assessment at Sustainability Appraisal stage of site assessment.

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<sup>4</sup> Ashford Borough Saved Local Plan 2000 Policies LE11, LE12, LE13 and LE16.



### ***Heritage, Archaeology and Historic Environment***

Other constraints to development such as Archaeological potential, Conservation areas, listed buildings, scheduled ancient monuments, historic parks and gardens and tree preservation orders have been identified within the individual site assessments in Part 2. If development is constrained by, or assessed to have an adverse impact on, any of these important settings that cannot be mitigated then they will be removed from the survey at this stage. The NPPF directs that opportunities for new development within Conservation Areas or within the setting of heritage assets that could enhance or better reveal their significance should be treated favourably.<sup>5</sup>

### ***Environmental/Amenity Impacts Experienced by Potential Occupiers and Neighbours***

Any sites proposed that would cause adverse environmental conditions which would be experienced by prospective residents or existing neighbours (for example noise or odour) will be removed at this Part of screening.

Visual amenity of existing residents and potential occupiers is also an important factor in determining site suitability. An assessment of the surrounding built environment of the site will be undertaken to assess potential amenity issues.

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<sup>5</sup> NPPF paragraph 137.

## Screening Part 3 - Achievable Sites and Development Potential

A site is considered 'Achievable' for development when there is a reasonable prospect that the type of development proposed will be developed on the site at a particular point in time. This requires a judgement on the economic viability of the site and cooperation of the developer/landowner, and the availability of the correct infrastructure.

This assessment includes:

- **Market Factors** – such as adjacent uses, economic viability of existing, proposed and alternative uses in terms of land values, attractiveness of the locality, level of potential market demand and projected rate of sales.
- **Cost Factors** – such as site preparation costs in relation to any physical constraints, any exceptional works necessary, relevant planning standards or obligations, and prospect of funding or investment to address identified constraints or to assist development.
- **Delivery Factors** – such as phasing by the developer, realistic build out rates and the size and capacity of the developer/s.

If a constraint is preventing a site or location from being 'achievable' then an assessment needs to include details of how these constraints may be overcome. This may include new infrastructure, assisting with land ownership problems, environmental improvement or reviewing policy. **Sites that were not considered 'achievable' are removed in Part 3 of the assessment.**

Sites that meet all of the criteria at this stage are considered developable and deliverable – the site is available, in a suitable location for the proposed development, and there is a reasonable prospect that the site could be viably developed at the point envisaged in the plan period. **These sites will move forward into the Sustainability Assessment stage to be assessed as potential allocation sites in the Local Plan 2030, it does not automatically show that the site is suitable for allocation, or that an application for planning permission would be permitted.**

### *Identifying the Development Potential of each Site/Broad Location*

To estimate the housing potential of the identified sites and broad locations a standard Housing density assumption is required. Previous density assumptions used in the 2009 SHLAA and in some of the existing Local Plan policies were high, in line with the market at that time and the density policies in place.

Since this date, the economic downturn has changed the housing market and the Council has adopted the Residential Space Standards and Residential Parking SPD's. These standards reduce the capacity of sites and therefore a reduction in the density assumptions was required.

The NPPF paragraph 47 allows local authorities to set out their own approach to density to reflect local circumstances. The NPPG suggests using existing development schemes as a basis for assessment. Using this guidance, a number of current and recent development proposals and implemented schemes across the borough have been assessed. Many of the schemes assessed were allocated sites that have been recently granted planning permission and that the SPD standards applied to. Therefore a realistic average density for each area of the borough has been calculated and can be seen in Table 1 below. In addition to this, the Town centre has been divided into two sections for different assumptions for flats and houses. This is to be in line with particular schemes that are emerging or underway in the Town Centre.

These density assumptions have been used in the site assessments, also taking into account any physical constraints and individual characteristics on the sites.

**Table 1 – Housing Density Assumptions**

<b>Location</b>	<b>Average density (net dwellings per hectare)</b>
Ashford Town Centre (Flats)	90
Ashford Town Centre (Houses)	40
Ashford Urban Area	35
Ashford Urban Fringe Area	30
Ashford Urban Extensions	35
Tenterden	30
Rural Settlements	25

An assumption of employment development is also required for employment and mixed use sites to provide a realistic assessment of a sites potential. The employment site assessments work on the same assumptions as the Employment Land Review used:

An average plot ratio of 0.4 is assumed in most cases, so that a 1 ha site would be needed to accommodate 4,000 m<sup>2</sup> of employment floorspace. However, for office uses, allowance is made for up to 30% of new provision being in higher density town centre developments at a plot ratio of 2.5.

These assumed housing and employment figures were used to assess the capacity of all sites, however, if the site has constraints a reduced ‘developable’ site area has been used to calculate the density, to provide a more realistic figure of potential development. In the

same way, sites that could achieve a higher density than the assumption above due to their location and surroundings have been increased. Where this has been done, an explanation is provided in the conclusion of the assessment.

## **Neighbourhood Planning Areas**

Sites that are located within designated neighbourhood planning areas have been identified in the list of sites. Sites within these areas may have been identified through this SHELAA as suitable for further consideration, but may not be assessed further for Local Plan consideration in the Sustainability Process. The Neighbourhood Plan Groups will undertake their own site analysis for potential Neighbourhood plan inclusion. Please note that each neighbourhood plan designation has been made at different points in this process, and therefore those that had not applied before site assessment had commenced, may have a full assessment.

More information on Neighbourhood plans can be found here:

<http://www.ashford.gov.uk/neighbourhood-plans>

## STAGE 3: DETERMINING OTHER SOURCES OF CAPACITY

### Windfall and Small Housing Sites

Windfall development is residential development that comes forward on sites that aren't allocated in a Development Plan.

In the previous 2009 SHLAA, windfalls were not considered as part of the borough's land supply as government guidance did not allow this. New guidance in the NPPF (para 48) changes this stance and local authorities may now make an allowance for windfall sites in the five-year supply if they have compelling evidence that they have consistently become available in the local area and will continue to provide a reliable source of supply. This evidence should include historic windfall rates, future trends and should not include residential gardens.

Historically, Ashford has a strong track record of consistently delivering windfall housing across the Borough. The table below shows windfall completions on sites for the last 10 years.

	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	TOTAL	%Split
Town Centre	2	20	6	9	20	1	13	31	234	29	365	22%
Urban	14	101	113	65	84	51	22	59	82	22	613	37%
Rural	49	111	101	98	61	67	46	78	18	63	692	41%
TOTAL	65	232	220	172	165	119	81	168	334	114	1670	

This data shows a strong and consistent rate of windfall housing delivery with an average of 167 dwellings completed each year. It is highly likely that this consistent rate of delivery will continue and, indeed may well be exceeded.

However, it is considered that a windfall housing figure which is more balanced than simply relying on 167 units a year should be applied. Therefore the council will rely on existing extant windfall permissions for the first four years of 130 units (total 520) with a reduced reliance of 100 units pa for the remainder of the plan period (total 1100). This would equate to a total windfall assumption of 1,620 units during the 14 year plan period.

**Details of the extant, windfall permissions can be found in Appendix 8.**

The size threshold for seeking potential sites in the SHLAA is 5 units net. However, smaller sites (identified as a result of receiving planning permission) also contribute to total potential of housing supply.

The 2016 Housing Information Audit shows that there is additional capacity from small sites with planning permissions. However, these are mainly all windfalls and therefore have not been counted separately to ensure no double counting with the windfall assumption figures above.

## STAGES 4: ASSESSMENT REVIEW AND FINAL EVIDENCE

After the initial screening of sites and the assessment of their deliverability/ developability had been made, the development potential of all sites was collated to produce a potential housing land supply that sets out how much housing can be provided, where, and at what point in the future.

The table below summarises the overall estimated housing potential for the period 2016 to 2030 and beyond. Sources include potential capacity from specific sites assessed using the SHELAA methodology and extant and forecast of windfall sites.

### Potential Housing Capacity - Summary table

Source of housing potential	0-5 Years	6-10 Years	11+ Years
Assessed Identified sites	6241 (including large windfall)	5174	8893
Windfall Assumption	509 (small windfall)	500	--
<b>Total</b>	<b>6750</b>	<b>5674</b>	<b>8893</b>

The full housing capacity table and trajectory can be found in Appendix 9.

The target housing requirement applied at the time of undertaking this SHELAA update was 14,029 net additional dwellings over the period 2017 to 2030. The SHELAA aimed to identify more than sufficient capacity to allow a degree of choice and acknowledging that even where sites appear deliverable/developable there is a risk that they will not come forward.

In seeking to identify more than sufficient potential the process involved taking a hard look at all potentially sustainable options. This has included assessing some sites involving very significant tensions with local policy. It will be for the Local Plan and Sustainability Appraisal process to identify the most suitable sites to meet requirements drawing upon the information provided by the SHELAA. The site assessment will indicate whether a site has been through a more detailed assessment in the Sustainability Appraisal process

**Conclusion: The SHELAA indicates that potential supply is more than sufficient to meet the housing requirement across the Plan period.**

## **NEXT STEPS:**

### **Risk Assessment and Review – Housing Sites**

The overall screening and assessment process applied in this SHELAA has been to consider whether there is a reasonable prospect that housing potential can be realised on these sites. In some instances assessment has revealed that certain conditions need to be met before potential can be realised. A number of constraints were identified as being likely to delay or prevent sites assessed as suitable or available from being brought forward for development and actions are identified as being in place to address some of these. The willingness of landowners to sell, and of housebuilders to build in the current market were identified as key constraints. Clearing contamination will likely prove to be a significant constraint on several identified sites in the Town Centre which may be ameliorated somewhat should the price of land rise in the medium to long term.

It would be beyond the Council's resources to have applied exhaustive evaluations and viability assessments to the large number of sites in the SHELAA list of sites. The SHELAA has shown that housing potential exceeds the nominal benchmark target applied, and in these circumstances no re-iteration or further assessment is considered necessary at the present time.

The housing completions and new permissions will continue to be monitored annually through the Council's annual Housing Information Audit, in particular to assess the availability of a rolling 5 year land supply. The Assessment will be subject to more substantial review at such time as this is required to assess availability of housing land over the longer term.

### **Employment land and other sites:**

Many of the identified employment sites are already established employment locations. Those sites which have been submitted as 'new' sites for consideration as part of the call for sites will be assessed further through the Sustainability Appraisal, to determine if allocations for employment land could be made through the Local Plan 2030.

Sites submitted for community, leisure, tourism or for traveller sites, have been considered as part of the Local Plan preparation. These sites can be found in appendices 6 & 7.

# APPENDICES

*Appendix 1: Full list of SHELAA sites and Summary Assessment*

*Appendix 2: Housing Sites Removed at Part 1 Screening Assessment*

*Appendix 3: Housing Sites Removed at Part 2 Screening Assessment*

*Appendix 4: Housing Sites Removed at Part 3 Screening Assessment*

*Appendix 5: Housing Site Assessments that Remain - LAND SUPPLY*

*Appendix 6: Employment Sites*

*Appendix 7: Sites Assessed for 'Other' Uses (Including Gypsy and Traveller)*

*Appendix 8: Windfall Extant Planning Permissions for Housing (Under 5 units)*

*Appendix 9: Housing Trajectory (SHELAA)*

*Appendix 10: Site assessments and Maps*