

Land Availability Assessment

Guildford Borough Council

2024

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Disclaimer

The Council does not accept liability for any factual inaccuracies or omissions within the Land Availability Assessment ('LAA'). The information within the LAA represents the best information available at the base date of 1st April 2024. Evidence information received since 1st April 2024 has been included where necessary to provide an accurate assessment.

Readers of this document are advised that additional constraints, which may have not been considered or listed, may apply to the identified sites and that planning applications will continue to be determined on their own merits, rather than on the information contained within this study. Issues may arise during the planning application process that could not have been foreseen in the preparation of the LAA. Landowners and applicants are advised to carry out their own analysis of site constraints for planning applications.

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1. Executive Summary

- 1.1 The Land Availability Assessment ('LAA') forms part of the evidence supporting the Local Plan: strategy and sites ('LPSS'). This LAA updates and replaces the previous LAA, published in 2023.
- 1.2 The National Planning Policy Framework ('NPPF') requires the preparation of a Strategic Housing Land Availability Assessment ('SHLAA') and an Economic Land Availability Assessment ('ELAA'). This document brings both housing and economic land availability assessments together in a single Land Availability Assessment, as recommended in the government's Planning Practice Guidance ('PPG').
- 1.3 The LAA includes assessments for a range of uses:
 - a variety of types of housing (e.g. housing for students, older persons, Travellers and Travelling Showpeople and self-build opportunities),
 - development for offices, business, industrial and storage / warehousing,
 - retail, food and drink, and leisure uses, and
 - Community uses (e.g. schools, burial grounds).
- 1.4 The LAA sits alongside other evidence-base documents, such as the Strategic Housing Market Assessment ('SHMA'), the Traveller Accommodation Assessment ('TAA'), the Employment Land Needs Assessment ('ELNA') and the Retail and Leisure Study ('RLS'). These documents identify future needs, whereas the LAA assesses potential land that could be developed to meet those identified needs.
- 1.5 The role of the LAA is to:
 - identify sites and broad locations with potential for development for housing and economic development over the plan period,
 - assess their development potential, and
 - assess their suitability for development and the likelihood of development coming forward (availability and achievability).
- 1.6 The LAA has been developed using the methodology set out in PPG (Guidance category – Housing and Economic Land Availability Assessment). The PPG advises using a site size threshold, which enables the inclusion of a windfall allowance for sites under that threshold. The LAA therefore applies the recommended site size threshold of five or more (gross) homes for inclusion, and 0.25ha (or 500m² of floor space) for economic development. Sites considered for other uses (including other types of housing) may be below these thresholds.
- 1.7 The LAA comprises important evidence used to support the Local Plan, but it does not itself determine whether a site should be allocated for development. The

adopted Local Plan defines the quantum and distribution of development, informed by the evidence base and consultation responses as appropriate.

- 1.8 The site and permission information in this LAA is base-dated 1st April 2024. This means that site information is presented as it was in April 2024. However, evidence of site delivery timescales has been accepted up to and including September 2024. The LAA will be updated annually, or as and when there are significant changes to the information about land in the borough that would affect the accuracy of the assessment.
- 1.9 Appendices to this main document provide more information about the individual pieces of land contributing to these numbers, and sites that have been considered but discounted.
- 1.10 This document does not grant planning permission for development. Whilst the LAA assesses the suitability of land for development, the assessment is made against the criteria set out in PPG specifically for the purpose of preparing this study. Should a planning application for development be submitted, further assessment of all material planning considerations that have not been taken into account in this assessment would be undertaken. Land that is included in the LAA may still be developed for other uses, as may land that has been discounted, subject to planning permission.
- 1.11 **The LAA is a technical study and therefore not a consultation document. However, if there is information about additional previously developed land in Guildford borough that would help us to update this LAA, we would be grateful to receive it. Please contact us by emailing planningpolicy@guildford.gov.uk or phoning 01483 444 471.**

2. Introduction

What is the LAA?

- 2.1 The Land Availability Assessment ('LAA') is a technical assessment of the amount of land that is available and suitable to meet the Borough's housing and employment needs. The LAA assesses whether land is suitable, available and viable for particular land uses, identifying the quantity of potential development (i.e. number of homes or floor space) and the timescales in which that development could be delivered.
- 2.2 The LAA is an important evidence base document that informs plan-making. However, the LAA does not itself determine whether a site should be allocated for development in the future, nor does it influence the likelihood of gaining planning permission on a particular site. All planning applications must, and will continue to be, determined against the development plan and other material planning considerations.
- 2.3 The LAA follows the methodology as set out in national Planning Practice Guidance ('PPG'). A number of assumptions have been made for each site, such as the site boundary and the quantity of development that it could accommodate; these assumptions have been made for assessment purposes.
- 2.4 The LAA is an evolving document and will be updated annually, or as and when there are significant changes to the information about land in the borough that would affect the accuracy of the assessment.
- 2.5 The LAA draws together the assessment of land for both housing and employment (including mixed-use) development potential together. This LAA replaces the previous LAA, published in 2023.

What is included in the LAA?

- 2.6 The LAA is a technical study that assesses the development potential of sites that have been either submitted to the Council through a call-for-sites exercise, or identified by Planning Officers through desk-based research. The call-for-sites is a process through which local landowners, developers, businesses, Town and Parish Councils and other interested parties are invited to submit sites to the Council for assessment of their suitability for future development. Existing allocations are also considered in the LAA.
- 2.7 The LAA includes:
 - A list of all sites or broad locations considered, a digital map showing all sites is available online at *insert website address here*,

- An indicative trajectory of anticipated development and consideration of associated risks,
- An assessment of the suitability, availability and achievability of each site,
- A plan of each site showing the assumed boundary, and
- An estimated development capacity that could be delivered on each site assessed to be suitable.

How will the LAA be used?

2.8 Alongside other evidence-base documents, the LAA supports the adopted Local Plan: strategy and sites (2019 – 2034). The objectively assessed need for housing in the Local Plan is 10,678 homes, with an identified need for at least 36,100 – 43,700 square metres of office and research and development (B1a and B1b) floorspace (net), alongside 3.7 – 4.1 hectares of industrial (B1c, B2 and B8) land (gross), and approximately 41,000 square metres of comparison retail floorspace (gross). The LAA identifies potential sites to address these needs.

3. Policy Context

National Policy and Guidance

- 3.1 The National Planning Policy Framework ('NPPF') places great emphasis on boosting the supply of housing and sets out at paragraph 69 that:

Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan period;*
- and*
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.*

- 3.2 These timescales have been used when assessing the deliverability or developability of each site for housing in the LAA.

- 3.3 The NPPF elaborates, in 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.

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.

- 3.4 The NPPF sets out that reviews of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments. Assessing the development needs of the Borough and identifying specific and deliverable sites in order to facilitate development is a crucial

aspect of the Local Plan process. The combined LAA, which includes an assessment of housing, economic and other land uses together, ensures that sites are considered for the most appropriate use.

3.5 Planning Practice Guidance (‘PPG’) sets out a robust methodology for producing the LAA, in the form of a flow chart as set out in Figure 1:

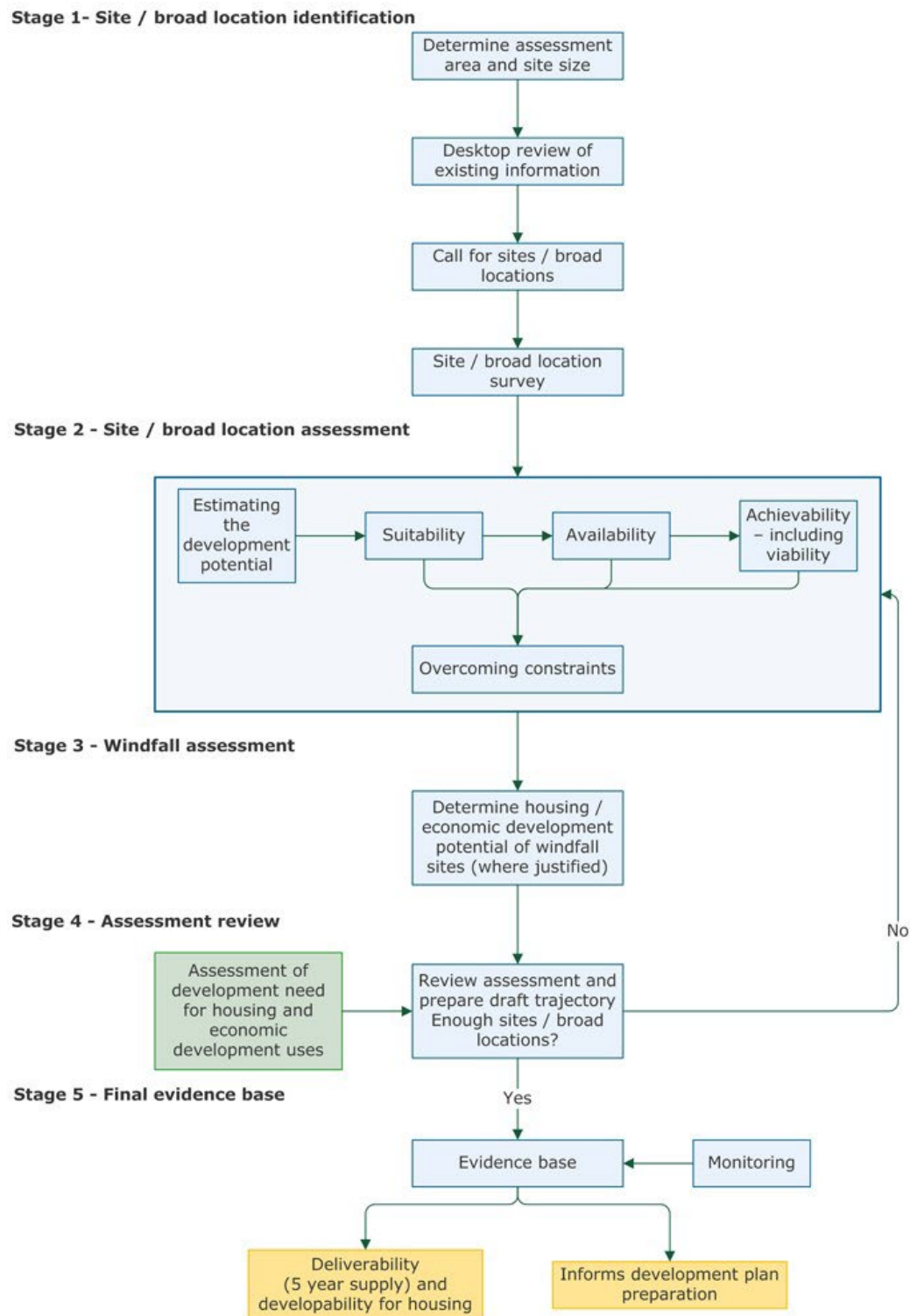


Figure 1: Land Availability Assessment methodology flowchart (Planning Practice Guidance (paragraph 005))

Local Policy

- 2.1 Sites assessed as part of the LAA process are done so in a quasi ‘policy-neutral’ manner. This means that sites are not judged against the current local planning policies in the way that a planning application would be in detail. However, regard has been had to current and emerging policies to provide appropriate context; for example if a site currently operates in a use that is ‘protected’ within the Local Plan, that site has been excluded from the first five years of delivery.

4. Methodology

- 4.1 As outlined in Figure 1, PPG suggests a five-stage approach which, when followed, should lead to a robust assessment of land availability. The assessments should be thorough but proportionate. This advice and structure was followed when setting the methodology and undertaking the site assessments for this LAA.
- 4.2 The Council’s implementation of the recommended methodology is set out in Appendix 1: Methodology.
- 4.3 Briefly, the LAA methodology was carried out in 7 broad steps:
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.
- 4.4 The stages outlined above were not necessarily conducted sequentially and some stages overlapped. This document covers all stages of the LAA process.

5. Core Outputs

- 5.1 The LAA establishes a number of core outputs. The key elements are:
- a) A list of all sites or broad locations considered, cross-referenced to their locations on maps¹;
 - b) An assessment of each site or broad location; addressing its suitability for development, availability and achievability, to determine whether a site should realistically be expected to be developed and when²;
 - c) The potential type and quantity of development that could be delivered on each site or broad location; including a reasonable estimate of build-out rates, setting out how any barriers to delivery could be overcome and when³; and
 - d) An indicative trajectory of anticipated development and consideration of associated risks⁴.

Future Provision

- 5.2 This section outlines the quantity of development that, in accordance with the LAA assessment, could be provided in the future within Guildford borough.
- 5.3 Each site (without planning permission) that contributes toward the identified potential future provision of development within the borough has a corresponding assessment sheet and assumed boundary map provided in Appendix 2: Realistic Candidates for Development. Equivalent land that does have planning permission is listed in Appendix 4: Sites with Planning Permission.

Potential Housing Supply Identified in LAA

- 5.4 Table 1 (below) sets out the number of dwellings that could reasonably be expected to be delivered in the borough as identified in the LAA (without planning permission).

¹ This output is set out in Appendix 2: Realistic candidates for development, and Appendix 3: Discounted sites.

² This output is set out in Appendix 2: Realistic candidates for development, and Appendix 3: Discounted sites.

³ This output is set out in Appendix 2: Realistic candidates for development.

⁴ This output is set out below in the main document, and in Appendix 7: Site Delivery.

Location	Number of dwellings (net) per delivery period			
	1-5 years	6-10 years	11-15 years	Total
Town Centre	0	265	110	375
Guildford urban area	0	943	1,611	2,554
Ash and Tongham	0	135	144	279
Villages	65	136	12	213
Previously Developed Land Inset from Green Belt	0	0	0	0
New Settlement	260	1,000	740	2,000
Student Accommodation (C3 Equivalent)	0	0	36	36
Care Homes (C3 Equivalent)	0	56	0	56
Rural exception	18	30	30	78
Windfall	327	785	460	1,572
Total	670	3,350	3,143	7,163

Table 1: Potential number of dwellings per delivery period identified in LAA

Outstanding Capacity

- 5.5 In addition to the potential number of dwellings to be delivered as outlined in Table 1, the total number of homes expected to be delivered on sites with outstanding planning permission (for C3 residential use) is 3,564 (net) throughout the delivery period.
- 5.6 Reflecting national guidance, sites with detailed planning permission and sites that have commenced development are expected to be delivered within the first five years of the delivery period, although wherever possible this has been confirmed with the applicants. In addition to contacting applicants the Council has assessed additional evidence to determine the delivery timescales of the sites with detailed planning permission more accurately. This evidence includes, but is not limited to, looking at the number of pre-commencement conditions and how many of these have been discharged, progress towards a S106 Agreement being agreed and signed, and whether there is news/marketing information about the development that indicates a timeframe for delivery. These sites contribute 2,540 (net) homes that are expected to be delivered within the first five years of the delivery period.
- 5.7 The Council has requested confirmation from landowners and planning agents of the anticipated phasing of delivery of their respective sites in order to construct the most robust, evidence-based analysis available. Confirmation of anticipated delivery was sought

on sites that have detailed permission for over 50 homes and for all outline permissions. A summary of the deliverability evidence is provided in Appendix 7. The resulting anticipated phasing schedules for these sites are provided in Appendix 7: Site Delivery.

- 5.8 Based on the assessment of site delivery evidence as demonstrated in Appendix 7: Site Delivery, 252 (net) homes are expected to be delivered on sites with outline planning permission within the first five years of the delivery period. Therefore, the total outstanding capacity for sites with outstanding planning permission is 2,792 (for C3 residential use).
- 5.9 Planning permissions for student accommodation and other communal accommodation (such as residential care homes) have been counted toward the housing supply in accordance with the guidance issued in PPG⁵, and the Housing Delivery Test Measurement Rule Book⁶. A bespoke methodology has been applied in order to reflect the specific context of Guildford, which is set out in Appendix 5: Student Accommodation. Outstanding permissions for student and other communal accommodation provides the equivalent of 591 homes within the first five years of the delivery period. Net outstanding capacity within the first five years of the delivery period therefore becomes 3,383 homes (2,792 + 591).
- 5.10 However, in order to account for permissions that do not get built-out, the Council has applied a lapse-rate to the total number of existing planning permissions that have not yet commenced. Over the period covering 1st April 2011 – 31st March 2021⁷, 5% of the total units on sites granted planning permission were not built-out and the permission expired. Therefore, a 5% reduction has been applied to all outstanding planning permissions that have not yet commenced in order to account for this. Net outstanding capacity within the first five years of the delivery period is therefore 3,296 homes $((1,736 \times 0.95) + 1,647 = 3,296)$.
- 5.11 Housing supply within the first five years of the delivery period is therefore 3,966⁸. This represents a Five Year Housing Land Supply position of 6.32 years. The complete 5YHLS calculation is provided at Appendix 8: Five Year Housing Land Supply.
- 5.12 The total potential capacity of sites identified in Appendix 2: Realistic Candidates for Development is 7,163 throughout the delivery period. Added to the outstanding capacity from permitted sites as identified above, including student and other communal accommodation, of 5,291, the total identified future provision of homes (net) throughout the delivery period becomes 12,454.

⁵ Paragraphs 034 Reference ID: 68-034-20190722, 041 Reference ID: 68-041-20190722

⁶ Available at: <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>

⁷ Planning permissions granted after 1st April 2021 and not currently commenced would be considered extant at the base-date of the LAA and therefore would not have expired.

⁸ This figure represents the sum of the capacity of the identified LAA Sites in addition to the outstanding capacity of existing planning permissions (670 + 3,296).

Total Housing Supply

5.13 Since the start of the plan period (2015), 4,702 homes have been completed in the period to 31 March 2024. This makes a total supply over the delivery period of 17,156 homes, as demonstrated in Table 2 below.

5.14 Local Plan Policy S2: 'Planning for the borough – our spatial development strategy' identifies a requirement of 10,678 homes over the Plan period (2015 – 2034). The total identified supply is therefore greater than the requirement in Policy S2. However, this flexibility in supply is not overprovision; instead, it is necessary to ensure that the total requirement in Policy S2 can be met and that a robust five-year housing land supply can be maintained, particularly in the early years. This flexibility in supply is necessary to enable the plan to adapt to rapid change, as required by the National Planning Policy Framework ('NPPF'), should sites not deliver as planned.

Source	Number of dwellings (net) per delivery period				
	Completed	1-5 years	6-10 years	11-15 years	Total
LAA Total	-	670	3,350	3,143	7,163
Completions	4,702	-	-	-	4,702
Outstanding capacity (Sites with detailed permission, commenced sites, and outline permissions)	-	2,792	2,093	0	4,885
Student / C2 permissions (C3 equivalent)	-	591	-	-	591
Permission lapse rate	-	-87	-98	-	-185
Total	4,702	3,966	5,345	3,143	17,156

Table 2: Total number of dwellings per delivery period identified in LAA assessment

Other types of housing

5.15 The LAA includes assessments for land that could deliver self-build opportunities, student accommodation, residential care/nursing homes, and traveller accommodation. Information about planning permissions for these uses is available in the Authority Monitoring Report.

Self-build opportunities

5.16 Ten site allocations in the Local Plan: strategy and sites (2015 - 2034) require the inclusion of self-build plots. These are:

- Blackwell Farm, Hogs Back, Guildford (LAA site 311),

- Garlick's Arch, Send Marsh/Burnt Common and Ripley (LAA site 2258),
- Gosden Hill Farm, Merrow Lane, Guildford (LAA site 46),
- Land at former Wisley airfield, Ockham (LAA site 53 and 54),
- Land near Horsley railway station, Ockham Rd North, East Horsley (LAA site 240),
- Land to the north of West Horsley (LAA site 975),
- Land to the south and east of Ash and Tongham (LAA site 2247),
- Land to the west of West Horsley (LAA site 15), and

5.17 A total of 301 self-build plots are required within these allocations.

Student and Co-living Accommodation

5.18 Planning permissions and completions of student accommodation units have been counted toward the housing supply in accordance with the guidance issued in PPG⁹, and the Housing Delivery Test Measurement Rule Book.

5.19 Realistic candidates for development for student accommodation are identified at:

- The University of Law, Braboeuf Manor, Portsmouth Rd (LAA site 1210)¹⁰

5.20 For the full assessment of student accommodation, please refer to Appendix 5: Student and Co-Living Accommodation.

Traveller and Travelling Showpeople accommodation

5.21 See Appendix 6: Traveller and Travelling Showpeople Accommodation.

Residential care / nursing homes

5.22 Planning permissions and completions of nursing homes or residential care accommodation have been counted toward the housing supply in accordance with the guidance issued in NPPG¹¹, and the Housing Delivery Test Measurement Rule Book. This is calculated by taking the net increase in bedrooms for other communal accommodation in the local authority area and dividing this by the average number of adults (1.8) in households in England.

5.23 LAA Site 53 Former Wisley Airfield¹², is identified as the only realistic candidate to deliver care home bedspaces or sheltered accommodation in C2 use within the Plan period. The site is expected to deliver around 100 bedspaces in the 6 – 10 year period, which is the equivalent of 56 C3 units.

⁹ Paragraph: 034 Reference ID: 68-034-20190722

¹⁰ The University of Law closed the Guildford campus in June 2024. There is a pending planning application on the site (ref: 23/P/01850) for extra care housing with ancillary accommodation.

¹¹ Paragraph: 035 Reference ID: 68-035-20190722

¹² A hybrid planning application was granted permission on appeal on 24 May 2024 (after the base date of the LAA). This includes 100 units for older people.

5.24 There are six currently outstanding permissions for care home or sheltered accommodation in C2 use which have been counted within the borough's assessment of outstanding capacity:

- The Old Hall, Send - 20 (net) residential care bedspaces (planning reference: 19/P/01559) which is the equivalent of 11 C3 homes.
- Ashley House, Shalford - 37 (net) residential care bedspaces (planning reference: 20/P/01291) which is the equivalent of 20 C3 homes.
- L/A Cothelstone and Field Fares, Send - 74 residential care bedspaces (planning reference: 23/P/00356) which is the equivalent of 41 C3 homes.
- Claremont Court, Guildford - 13 additional nursing bedspaces (planning reference: 18/P/02186) which is the equivalent of 7 C3 homes.
- Robertsons Nursing Home, Hurtmore – 13 (net) nursing bedspaces (planning reference: 22/P/00508), which is equivalent to 7 C3 homes.
- L/A former Pond Meadow School, Guildford - 59-bed extra-care facility (planning reference: 22/P/01636) which is the equivalent of 32 C3 homes.

Economic and other uses

5.25 Information about planning for retail and leisure uses is available in the Retail and Leisure Study (2014, updated 2017). The Authority Monitoring Report 2023/24 (AMR) shows the total retail and employment floorspace granted planning permission, and total floorspace under construction and completed (floorspace gains and losses) during the last full monitoring year (ending 31st March 2024). The data on permitted retail floorspace in the AMR covers each of the former Class A uses (some of which now fall into Class E¹³) whilst the permitted employment floorspace covers office, research and development and light industrial uses (Class E(g)), general industrial (Class B2) and storage and distribution uses (Class B8).

5.26 Most of the realistic candidates for development that are listed in the LAA as suitable for retail, employment, and other non-residential uses are also allocated for these uses in the Local Plan: strategy and sites (2019), in some cases as part of mixed-use schemes in combination with other uses.

Retail uses

5.27 Realistic candidates for development for retail uses are identified at:

- North Street redevelopment, Guildford (LAA site 205),
- Guildford Cinema, Bedford Road, Guildford (LAA site 2229),

¹³ Use Classes A1, A2 and A3 were revoked on 1 September 2020 and replaced by the current Class E (a, b, c), whilst the former Class A4/A5 uses became sui generis. For further details of the current and former use classes, see https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use.

- Gosden Hill Farm, Merrow Lane, Guildford (LAA site 46)
- Blackwell Farm, Hogs Back, Guildford (LAA site 311), and
- Land at former Wisley airfield, Ockham (LAA sites 52 and 53)¹⁴, and

Employment uses

5.28 Realistic candidates for development for employment uses are identified at:

- Blackwell Farm, Hogs Back, Guildford (LAA site 311),
- Gosden Hill Farm, Merrow Lane, Guildford (LAA site 46),
- Land at former Wisley airfield, Ockham (LAA sites 52 and 53)¹⁵,
- Send Business Centre and Tannery Studios, Tannery Lane, Send (LAA site 1251),
- 77 to 83 Walnut Tree Close, Guildford (LAA site 8, note there is existing employment floorspace).

Other uses

5.29 Land has been identified to provide the following:

- a new burial ground at Salt Box Road, Guildford (LAA site 2018),
- new allotments in Ash, and Westborough (LAA sites 2341 and 176),
- Hospital related development. This is uses which support the operation of the Royal Surrey County Hospital, including medical facilities and accommodation for staff (LAA site 131), and
- redevelopment of the cinema to provide more screens and additional food and drink floorspace (LAA site 2229).
- floorspace within the North Street redevelopment site (LAA site 205) to provide additional food and drink uses, including drinking establishments.

6. Conclusion

Assessment Review

6.1 Planning Practice Guidance requires that once the sites and broad locations have been assessed, the development potential of all sites be collected to produce an indicative

¹⁴ Planning application 22/P/01175 for a residential-led mixed-use scheme including Class E, F2(b), B2 and B8 retail and employment uses was granted permission on appeal on 24 May 2024 (after the base date of the LAA).

¹⁵ Planning application 22/P/01175 for a residential-led mixed-use scheme including Class E, F2(b), B2 and B8 retail and employment uses was granted permission on appeal on 24 May 2024 (after the base date of the LAA).

trajectory. The trajectory should set out how much housing and economic development can be provided, and at what point in the future¹⁶.

- 6.2 The NPPG is clear that, should insufficient sites be identified to meet the objectively assessed need, the assessment will need to be revisited:

If there are insufficient sites, “Plan makers will need to revisit the assessment, for example changing the assumptions on the development potential on particular sites (including physical and policy constraints) including sites for possible new settlements.

If, following this review, there are still insufficient sites, then it will be necessary to investigate how this shortfall should best be planned for. If there is clear evidence that the needs cannot be met locally, it will be necessary to consider how needs might be met in adjoining areas in accordance with the duty to cooperate”¹⁷.

- 6.3 The LAA has considered the development potential of land in Guildford borough for housing and economic uses. The assessment has identified land in the borough that could deliver up to 12,454 new homes over the next 15 years (including land with outstanding planning permission).
- 6.4 The study shows that up to 3,966 new homes are expected to be delivered within the first five years of the delivery period. This represents a Five Year Housing Land Supply position of 6.64 years.
- 6.5 The assessment has also identified potential land to meet identified need for other uses, including land to deliver Traveller accommodation, employment and retail floorspace, student accommodation and residential care/nursing homes.

Next Steps

- 6.6 The assessment was produced with the best information available as at 1st April 2024. The LAA is an iterative process and as such, any future reviews will incorporate any new information available to the Council. This will include any new sites and additional information about the existing identified sites. Further consideration will also be given to windfalls and non-implementation rates.
- 6.7 The Council intends to update the LAA annually to take account of new information. Given that new information may be submitted to, and considered by, the Council at any time, conclusions on the suitability, availability and achievability of the identified sites may be subject to change, as are assumptions on whether sites are deliverable or developable.

¹⁶ Paragraph: 024 Reference ID: 3-024-20190722

¹⁷ Paragraph: 025 Reference ID: 3-025-20190722