

Appendix E

# Strategic Land Availability Assessment (SLAA)

---

**SPELTHORNE BOROUGH COUNCIL**

DRAFT REPORT

January 2018



## Contents

<b>Important Notice: Disclaimer</b> .....	2
<b>Executive Summary</b> .....	3
<b>1. Introduction</b> .....	4
<b>2. Methodology</b> .....	5
<b>Stage 1: Identification of sites and broad locations</b> .....	5
<b>Stage 2: Site/broad location assessment</b> .....	7
<b>Stage 3: Windfall Assessment</b> .....	7
<b>Stage 4: Assessment review</b> .....	8
<b>Stage 5: Final evidence base</b> .....	9
<b>3. Conclusions, monitoring and next steps</b> .....	11
<b>Appendices</b>	
<b>Appendix 1 – Sources of Supply (deliverable and developable sites)</b> .....	12
<b>Appendix 2 – Deleted sites</b> .....	13
<b>Appendix 3 - Green Belt Sites</b> .....	15
<b>Appendix 4 - Under-delivery Calculation</b> .....	19
<b>Appendix 5 – Estimated delivery of SLAA sites</b> .....	20
<b>Appendix 6 – Small sites allowances</b> .....	25

## Important Notice: Disclaimer

The SLAA is a key part of the evidence base that will be used to inform the Council's future Local Plan but does not in itself constitute planning policy. It is important to note that the SLAA does not formally allocate sites for development and the identification of a site in this document as having the potential for housing or other development is based on the evidence before the Council at the time of writing. The SLAA will not prejudice the determination of any subsequent planning application for that site nor does it influence the Council towards the favourable consideration of any future planning applications for the development of that site.

Any comments made in relation to a particular site do not constitute a planning brief or formal planning advice.

All proposals for housing development arising during the plan period will be considered on their individual merits in relation to adopted and emerging development plan policies and other material considerations relevant at the time of determination. At this present time all planning applications are being assessed according to the adopted development plan.

The Council accepts no liability for any costs, liabilities or losses arising as a result of the use of, or reliance upon, the contents of this report.

## Executive Summary

The purpose of the SLAA is to help the Council identify specific sites that will help meet housing and/or employment requirements within Spelthorne and the wider Housing Market Area and Functional Economic Area.

The Strategic Land Availability Assessment (SLAA) has been produced in accordance with national planning policy and guidance and the jointly produced SLAA methodology with Runnymede Borough Council (which was published in December 2015), who share the same Housing Market Area (HMA).

The SLAA has not been jointly prepared with neighbouring authorities on the basis that these authorities are at different stages of Local Plan preparation. However, this does not preclude the authorities producing a joint SLAA in the future and officers in the Runnymede/Spelthorne HMA will continue to work collaboratively and on an ongoing basis with each other on matters related to meeting housing and other development needs.

The SLAA evidence is used to assist the Council in identifying the supply of housing, which will help deliver the objectively assessed housing requirement across the HMA, as far as possible. The outcomes in relation to the housing supply will form the basis for ongoing conversations with Runnymede Borough Council and neighbouring HMAs in relation to how any unmet housing need will be met.

219 sites have been considered as part of this process, utilising a number of sources of supply. A list of all sites deemed deliverable and developable can be found at Appendix 5 and the site assessments are available on request from the Strategic Planning Team<sup>1</sup>.

62 sites are considered to meet the SLAA site criteria and are deemed suitable, available and achievable for development and therefore could be delivered within the first five years of the Plan. Taking account of sources of supply and assumptions, officers estimate that the five year supply of housing is 3728 units, which includes sites under construction (minus an under delivery discount of 1.51%). The sites identified through the call for sites exercise and classified as Green Belt are available in Appendix 3. These sites are not included within the SLAA yield of housing but may be subject to further consideration.

---

<sup>1</sup> Please email [planning.policy@spelthorne.gov.uk](mailto:planning.policy@spelthorne.gov.uk) for more information.

# 1. Introduction

- 1.1 The Strategic Land Availability Assessment (SLAA) has been produced in accordance with the jointly produced SLAA methodology between Spelthorne and Runnymede Borough Councils, who are identified as sharing the same Housing Market Area (HMA) as Spelthorne in the Runnymede/Spelthorne Strategic Housing Market Assessment (SHMA), first published in November 2015. The SHMA identifies an objectively assessed need for housing in the HMA, the portion of which attributed to Spelthorne 552-757 dwellings per annum<sup>2</sup>.
- 1.2 In September 2017 the Government published its consultation, '*Planning for the Right Homes in the Right Places*', setting out a number of proposals to reform the planning system to increase the supply of new homes and increase local authority capacity to manage growth. Included was a proposed new standardised methodology for calculating local authorities' housing need, with a provisional target of 590 dwellings per annum for Spelthorne. The outcome of the consultation and a decision on whether the methodology will be formally introduced is still awaited.
- 1.3 The SLAA identifies the land supply in the Borough, which will help meet identified housing needs.
- 1.4 The SLAA also identifies land for other uses besides housing to help meet employment needs. The Council is in the process of producing its Employment Land Needs Assessment which will provide an evidence base to inform the preparation of the new Local Plan covering the period to 2035 by assessing economic development needs in line with national policy. The SLAA and the Employment Land Needs Assessment will inform subsequent work as part of the new Local Plan to evaluate specific employment allocations and determine where growth should be accommodated across the Borough.
- 1.5 The SLAA is a policy neutral document and the inclusion of a site in it does not mean that it will necessarily be allocated in the Development Plan, or gain planning permission.
- 1.6 The outcomes of the SLAA will be used to underpin the issues and options in the upcoming Local Plan consultation.

---

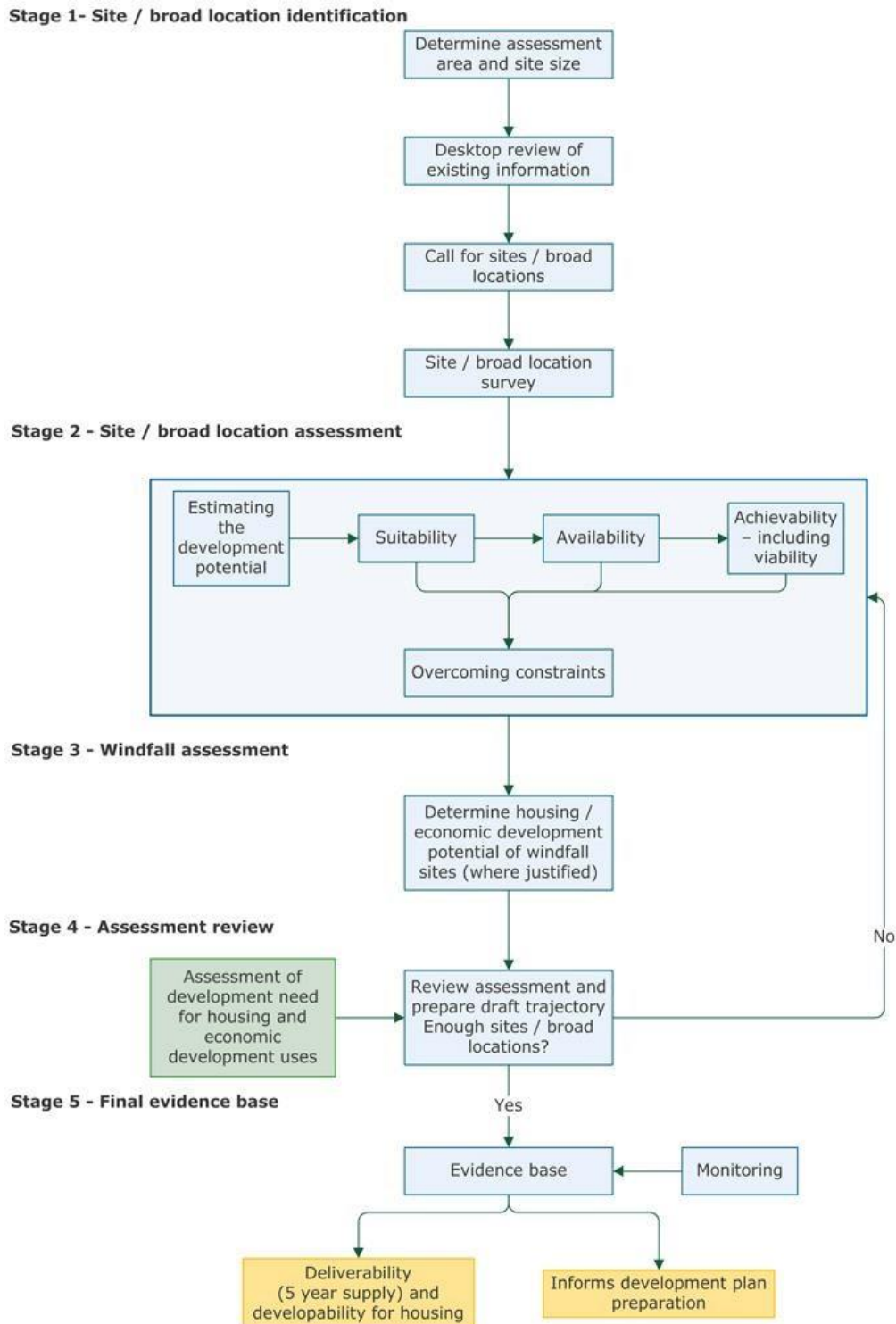
<sup>2</sup> <https://www.spelthorne.gov.uk/article/10078/SHMA>

## 2. Methodology

### Stage 1: Identification of sites and broad locations

2.1 Planning Practice Guidance (PPG) sets out a recommended methodology to follow when preparing SLAAs. This process is summarised in Figure 1.

**Figure 1: SLAA Methodology**



- 2.2 This assessment has been prepared using the detailed SLAA Methodology produced jointly by Spelthorne and Runnymede Borough Councils. The methodology is based on the PPG and the processes summarised in Figure 1.
- 2.3 The PPG advises that SLAA documents are prepared on a Housing Market Area basis. It is important to note that the HMA authorities are at different stages in their plan making process and it is therefore not practical that a joint SLAA document is prepared for the entire HMA at this time. This does not however preclude the authorities producing a joint SLAA in the future. A methodology regarding the assessment/inclusion of sites has been agreed by the two authorities. By using a common methodology, it is 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'.
- 2.4 All neighbouring authorities have been contacted under the Duty to Cooperate to seek their views of the SLAA methodology. All comments received were taken into consideration and the Council will continue to engage on this report and if sites progress through the Local Plan progress, on those where there could be cross-boundary issues.
- 2.5 A list setting out the sources of supply considered in the SLAA is provided in Appendix 1. This includes the call for sites exercise; existing allocations; sites within or previously in the planning process; and an officer search of the Borough's urban areas.
- 2.6 A total of 219 sites were considered through the SLAA, with 52 discounted because they were complete, were considered as part of a wider SLAA site, did not meet the threshold or were deemed unsuitable or confirmed as not available by landowners (Appendix 2). A further 55 sites were identified as Green Belt and so were discounted at this stage. These sites may be subject to further consideration.
- 2.7 In 2017 an independent Green Belt Assessment was produced for the Council by ARUP. The purpose of the Green Belt Assessment was to provide evidence of how different areas perform against Green Belt purposes as set out within the NPPF. This study identified a number of weakly performing local areas and several local areas for potential sub-division. The results of the Green Belt Assessment have informed the SLAA assessment of those sites that are situated within the Green Belt.
- 2.8 Sites within the Green Belt are not currently included within the potential supply of land. A separate schedule of sites in the Green Belt is provided in Appendix 3.
- 2.9 The SLAA has been informed by evidence available to the Council as of 1 January 2018, setting out the current position. Those local areas of Green Belt identified as weakly performing or for potential sub division as set out in the Green Belt Assessment may be considered further in due course. Smaller parcels currently forming part of larger 'strongly' or 'moderately' performing local areas may also be subject to further consideration in future.
- 2.10 It is also noted that the possible expansion of Heathrow Airport may have implications for land in the north of the Borough. Sites that could be susceptible to acquisition as part of the Heathrow Airport expansion have been assessed independent of this through the SLAA exercise and based on current available evidence. This does not mean that Green Belt land will not be subject to development through very special circumstances in the future through the Heathrow expansion.

## **Stage 2: Site/broad location assessment**

- 2.11 The SLAA methodology sets out the approach taken to assessing sites in terms of constraints within the Borough, which would impact the suitability of a site for development.
- 2.12 Where considering sites for residential use, the assessment focuses on sites delivering 5 net new housing units or greater, in compliance with advice contained within the PPG.
- 2.13 Where a site had received planning permission or was in the planning process, it was deemed to be available. Landowners were written to in order to establish whether a site was being considered for development, the time frame and potential use.
- 2.14 Where landowners have yet to confirm the availability of a site and it has been deemed suitable, sites have been included in the 11-15 year period. The SLAA is a live document and will be reviewed regularly, taking into account the most up to date information available.
- 2.15 The assessment of achievability was carried out based on the results of suitability and availability considerations. A site was largely deemed to be achievable if it was considered both suitable and available and there were no other major barriers to development. Sites cannot be considered achievable by definition in the first five years if they have been identified as unsuitable or unavailable during this time. Where a site may be available beyond five years and is suitable, an estimate of when it could come forward and its capacity is provided.
- 2.16 An assessment of site capacity was made based on various factors including current policy HO5 of the Spelthorne Core Strategy and Policies DPD 2009<sup>3</sup>, site constraints, planning history, the sustainability and accessibility of a location and the area's wider character. The Council's GIS mapping system was utilised to estimate the potential yield of a site.
- 2.17 Any sites submitted through the call for sites exercise provided information to assist officers in determining an appropriate yield on site and timing of delivery. Further input was received from the Council's Asset Management and Planning Development Management teams.
- 2.18 Sites contained in the SLAA have informed the Council's Brownfield Register<sup>4</sup> which is a government requirement.

## **Stage 3: Windfall Assessment**

- 2.19 Annex 2 of the NPPF states that windfall sites are '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'. In Spelthorne, this historically applies to small-scale sites.
- 2.20 As set out in the NPPF and the SLAA methodology, small-scale windfall has consistently formed part of the housing supply in Spelthorne and so the SLAA will continue to include a windfall allowance in the housing trajectory.

---

<sup>3</sup> [https://www.spelthorne.gov.uk/media/1436/Core-Strategy-and-Policies-Development-Plan-Document/pdf/core\\_strategy\\_and\\_policies.pdf](https://www.spelthorne.gov.uk/media/1436/Core-Strategy-and-Policies-Development-Plan-Document/pdf/core_strategy_and_policies.pdf)

<sup>4</sup> <https://www.spelthorne.gov.uk/brownfield>



- 2.21 Appendix 6 sets out how windfall allowances for both small sites and prior approval notifications have been determined.
- 2.22 An allowance of 27 units per annum is considered appropriate to take account of development coming forward on small sites. Small sites accommodating 4 net units or less are included within the windfall allowance.
- 2.23 Prior approval notifications can also make a contribution towards the supply of housing. Like small-scale windfalls, small-scale prior approvals are not considered through the SLAA. However they are included within the trajectory to ensure that there is no 'double-counting' of sites.
- 2.24 Alongside the small site windfall allowance, an allowance has been included for dwellings likely to arise from office to residential conversions carried out through the (General Permitted Development) (England) (Amendment) Order 2016. Small scale prior approval notifications (less than 10 units) have been accounted for with an allowance of 49 units over the plan period. This is in line with the historic trend in Spelthorne for windfall development to typically be small scale in nature.
- 2.25 Beyond Year 15, it is considered there is too much uncertainty and therefore the SLAA will only consider a rolling 15 year delivery period to ensure a greater degree of confidence in what will be delivered.

#### **Stage 4: Assessment review**

- 2.26 Once the sites and broad locations were identified, the development potential of the sites were assessed and used to produce an indicative trajectory. This sets out each site's development potential for residential development and when these sites could be developed (in years 1 to 5, years 6 to 10 or years 11 to 15).

##### Deliverable sites

- 2.27 This includes sites of 5+ units with planning permission whereby the development is under construction; sites of 5+ units which have planning permission but construction has not yet commenced; and sites which do not have planning permission but there is a reasonable degree of certainty that they will come forward within 5 years. This includes confirmation of their deliverability in the 1-5 year timescale from the relevant landowners.

##### Developable sites

- 2.28 The NPPF requires Local Authorities to identify developable sites as part of the assessment. These are sites which are able to accommodate 5 or greater net new units and are considered to be in a suitable location with a reasonable prospect that the site is available and could be achievable within years 6-15. These sites have a lower degree of certainty attached to them and are not expected to come forward in the next 5 years.
- 2.29 Sites in years 6-10 have been confirmed as available for development from the relevant landowners. Whilst all landowners have been contacted to confirm the availability of sites, a number have yet to be confirmed. These have therefore been included within the 11-15 year supply. The SLAA is a live document and will be reviewed regularly to take account of any new information that may emerge.
- 2.30 See Appendix 5 for delivery estimates of appropriate SLAA sites.

- 2.31 Any sites that were under the appropriate thresholds (unable to accommodate 5 net dwellings or economic development on sites of 500sqm floor space), were confirmed as unavailable by landowners or had complexities that would limit the achievability of a site were excluded. Small sites are assessed through the SLAA and taken account of through windfall calculations.
- 2.32 In order to help identify a realistic housing supply, non-implementations have been considered in order to determine an ‘under delivery discount’. Expired planning permissions have been considered against granted planning applications over a six year period between 2011 and 2017. Historic trends in Spelthorne have shown that it is very rare that sites that enter the planning system are not developed at all, therefore account has been taken of those sites that have been subject to a renewed or replaced planning permission. Appendix 4 sets out the non-implementation calculation.
- 2.33 A figure of 1.51% has been applied as an under-delivery discount to sites that do not benefit from planning permission, or do have planning permission but have not yet started. This figure should be taken as interim until the Government’s methodology for calculating housing need is finalised.
- 2.34 This is not applied to the small sites allowance as this has been derived from completions only and there is no evidence to suggest a significant downward trend in small-scale windfalls over the 15 year period in Spelthorne.

### Stage 5: Final evidence base

- 2.35 The SLAA methodology sets out the requirements of the NPPF for local planning authorities to identify and update annually their housing land supply evidence for the Plan period, through the SLAA evidence.
- 2.36 The objectively assessed housing need (OAN) derived from the Government’s draft standardised methodology identifies a need of 590 dwellings per annum in Spelthorne. Table 1 helps the Council to identify how much of the OAN can be met in Spelthorne and supports the options for housing and employment for consideration as part of the issues and options consultation for the Local Plan.
- 2.37 The SLAA site assessments estimate the land supply over the Plan period as follows:

Table 1: Estimated Delivery of SLAA Sites

Delivery Period	Supply of dwellings *with 1.51% under delivery discount
<b>Deliverable sites in years 1-5</b>	3728
<b>Developable sites in years 6-10</b>	1041
<b>Developable sites in years 11-15</b>	1224
<b>Total</b>	5993
<b>Per year delivery (average over 15 years)</b>	400

- 2.38 An Interim Housing Trajectory is available in the 2017 Authority Monitoring Report<sup>5</sup>. This will be updated in due course to include the sites identified through the SLAA set out in Table 1.

<sup>5</sup> [https://www.spelthorne.gov.uk/media/17479/Authority-Monitoring-Report-2017/pdf/Annual\\_Monitoring\\_Report\\_2017.pdf](https://www.spelthorne.gov.uk/media/17479/Authority-Monitoring-Report-2017/pdf/Annual_Monitoring_Report_2017.pdf)

2.39 The Council will monitor delivery of sites through its Annual Monitoring Report, which will help update the SLAA on an annual basis.

### 3. Conclusions, monitoring and next steps

- 3.1 The evidence contained within this SLAA will help inform the housing and employment issues and options approach for annual housing delivery over the Plan period. The options for consideration will be consulted on in spring/ summer 2018 and will be made available on the Council's strategic planning webpages.
- 3.2 The issues and options document will also set out the issues and options for meeting employment needs in for meeting employment needs in Spelthorne and the wider Functional Economic Area.
- 3.3 The next iteration of the SLAA will form part of the evidence base that supports the publication and submission Local Plan. The Local Plan SLAA that will be submitted with the Local Plan for examination will set out the annual housing delivery figure and whether the land identified can meet the five-year housing land supply.
- 3.4 The SLAA is a live document. Therefore if any member of the public, developer, landowner/agent has any further information that they would like to submit in relation to a site, or wish to submit a new site for consideration in the SLAA, the relevant information should be sent to the Strategic Planning Team at [planning.policy@spelthorne.gov.uk](mailto:planning.policy@spelthorne.gov.uk) or Strategic Planning Team, Spelthorne Borough Council, Knowle Green, Staines upon Thames, TW18 1XB.

## Appendices

### Appendix 1 – Sources of Supply (deliverable and developable sites)

	No. of Residential units	Notes
<b>Existing Allocations</b>	980	
<b>Call for sites</b>	172	Discounting all sites in Green Belt – subject to further review.
<b>Publically owned sites – Spelthorne BC and Surrey CC</b>	1391	
<b>Sites with planning permission – under construction</b>	764	
<b>Granted applications - currently unimplemented/ outstanding</b>	851	
<b>Sites in the planning system, pending consideration</b>	472	
<b>Expired, refused and withdrawn planning application sites</b>	42	
<b>Officer identified sites in urban area</b>	482	Owners contacted to confirm the availability of sites.

## Appendix 2 – Deleted sites

Site ID	Name	Street	Reason for deletion
AC1/002	Land to rear of 109	Ashgrove Road	Below SLAA threshold
AC1/003	Land at 201	Feltham Hill Road	Not suitable
AC2/001	192	Feltham Hill Road	Below SLAA threshold
AC2/002	126	Feltham Hill Road	Below SLAA threshold
AC3/003	Land off	Napier Road	Travelling showman site
AC3/004	DC Hill & Son (Textiles) Ltd, Hill House	Alexandra Road	Below SLAA threshold
AC3/005	195	Staines Road West	Confirmed as not available
AE1/001	525	Staines Road West	Below SLAA threshold
AE1/002	28A	Lynegrove Avenue	Below SLAA threshold
AE2/001	1-3	Echelforde Drive	Below SLAA threshold
AE3/001	Land at	Grays Lane	Travelling showman site
AE3/002	33-39	Feltham Road	Below SLAA threshold
AT2/002	156/158	Chesterfield Road	Potential ownership complexities
ST1/021	Former Majestic House Site	High Street	Implemented
ST2/020	Land NW of Langley Road	Langley Road	Included in ST1/031
HS2/002	Land Adjacent 55	Layton's Lane	Included in HS1/010
LS2/002	10	Squire's Road	Below SLAA threshold
LS2/003	Hall Adj. 68	Wood Road	Below SLAA threshold
LS2/005	Between 27+29	Mandeville Road	Below SLAA threshold
LS2/006	Garages	Greeno Road	Below SLAA threshold
LS2/007	55	Squire's Bridge Road	Below SLAA threshold
LS3/002	Adj 84	Hetherington Road	Below SLAA threshold
LS3/003	West of 86	Hetherington Road	Below SLAA threshold
LS3/006	Adj 3	Millfield	Below SLAA threshold
RL1/003	N of (r/o 75,77 Penton Road)	St Olave's Close	Potential ownership complexities
RL1/004	S of (r/o 119-121 Penton Rd)	St Olave's Close	Potential ownership complexities
RL1/005	161-162	Thames Side, pt Arcadia Caravan site and 15 Riverway	Confirmed as not available
SE1/009	Manor Farm Cottage, 126	Green Street	Potential ownership complexities
SE1/013	Dart House	Thames Street	Below SLAA threshold
SE2/002	292/294	Staines Road East	Confirmed as not available
SH1/001	The Anchor Hotel	Church Square	No dry means of escape
SH1/002	Copley Dene	Chertsey Road	Confirmed as not available
SH1/006	6	Green Lane	Below SLAA threshold
SH2/001	Land at	Station Road	Below SLAA threshold
SH3/001	Shapla Restaurant	Russell Road	Implemented
SN2/002	Hope Inn	Hithermoor Road	Green Belt
SN3/001	Heathrow Fencing	Gleneagles Road	Green Belt
SS1/001	Garages to the rear of 145-149	Kingston Road	Below SLAA threshold
SS1/003	Land at	Hensworth Road	Below SLAA threshold
SS3/002	152-154	Commercial Road	No dry means of escape
SS3/003	27	Gordon Close	Below SLAA threshold
ST1/001	White Lodge & Land to North/Brecknock	Stanwell New Road	Below SLAA threshold

<b>ST1/010</b>	189	London Road	Below SLAA threshold
<b>ST1/011</b>	181	London Road	Below SLAA threshold
<b>ST1/012</b>	Masonic Hall and Old Telephone Exchange site	Elmsleigh Road	Included in ST4/009
<b>ST1/024</b>	111	High Street	Implemented
<b>ST2/009</b>	55	Cherry Orchard	Below SLAA threshold
<b>ST2/010</b>	2	Glebe Road	Below SLAA threshold
<b>ST3/005</b>	7-17	Kingston Road	Confirmed as not available
<b>ST4/003</b>	Hanover House	Bridge Street	Included in ST4/002
<b>ST4/007</b>	25-27	Clarence Street	Proposed scheme complexities
<b>SH3/006</b>	Shepperton Service Station	Walton Bridge Road	Sites confirmed as not available
<b>Total</b>		52 sites	

### Appendix 3 - Green Belt Sites

Sites in the Green Belt have not been included within the SLAA housing figure and may be subject to further consideration as part of a range of options for meeting need within the new Local Plan. Sites highlighted yellow are situated within Local Areas identified as weakly performing or sub-areas with potential for sub division in the Spelthorne Green Belt Assessment 2017. This schedule does not include other constraints that may discount or limit development potential of these sites notwithstanding the Green Belt designation. Smaller sites within strongly or moderately performing Green Belt have been discounted at this stage but this does not preclude assessment for potential subdivision at a later stage as part of the Local Plan review.

#### CONSIDERATION AS TO WHETHER ANY OF THESE SITES WILL BE TAKEN FORWARD WILL BE SUBJECT TO PUBLIC CONSULTATION

SITE ID	ADDRESS	STREET	TOWN	SITE AREA	LAND TYPE	POTENTIAL YIELD (NET DWELLINGS)	POTENTIAL YIELD (COMMERCIAL sqm)	DELIVERABILITY	FINAL DELIVERABILITY COMMENTS
AC3/001	Lakeside	Chertsey Road	Sunbury	2.27	NOT PDL GB	0	0	Not developable	Green Belt - local area 16; strongly performing
AT1/002	Ashford Sports Club	Woodthorpe Road	Ashford	0.94	NOT PDL GB	42	0	Not currently developable	Green Belt - local area 18 weakly performing (AC-11).
AE1/003	Ashford Manor Golf Club	Fordbridge Road	Ashford	0.55	NOT PDL GB	25	0	Not currently developable	Green Belt - local area 22 weakly performing (AC-2)
HS1/002	Land at Croysdale Avenue	Croysdale Avenue	Shepperton	1.72	NOT PDL GB	0	0	Not developable	Green Belt - local area 32; strongly performing
HS1/003	Land to N of Croysdale Avenue	Croysdale Avenue	Sunbury	2.4	NOT PDL GB	60	0	Not currently developable	Green Belt local area 32. Sub area AC-13 potential to sub-divide.
HS1/004	Units 1 and 2, Longwood Business Park	Fordbridge Road	Sunbury	2.26	PDL GB	0	0	Not developable	Green Belt - local area 32; strongly performing
HS1/005	Land adjacent to Squires Garden Centre	Halliford Road	Shepperton	0.97	NOT PDL GB	0	0	Not developable	Green Belt - local area 32; strongly performing
HS1/006a	Land at Hazelwood and Upper Halliford Road	Upper Halliford Road	Sunbury	7.5	NOT PDL GB	0	0	Not developable	Green belt - local area 32; strongly performing
HS1/006b	Land at Hazelwood and Upper Halliford Road	Upper Halliford Road	Sunbury	4.3	NOT PDL GB	0	0	Not developable	Green belt - local area 33; strongly performing
HS1/008	Land north of Charlton Lane	Charlton Lane	Sunbury	13	NOT PDL GB	0	0	Not developable	Green Belt - local area 38; strongly performing
HS1/007	Land at Fordbridge Road	Fordbridge Road	Sunbury	4.5	NOT PDL GB	0	0	Not developable	Green belt - local area 32; strongly performing
HS1/009	Bugle Nurseries, 171	Upper Halliford Road	Shepperton	4.69	PDL GB	0	0	Not developable	Green belt - local area 39; strongly performing
HS1/010	Land to S and W Stratton Road	Stratton Road	Sunbury	7.63	NOT PDL GB	200	0	Not currently developable	Green Belt local area 32. Sub area AC-13 potential to sub-divide.
HS1/012	Land East of Upper Halliford	Nursery Road	Shepperton	3.74	NOT PDL GB	80	0	Not currently developable	Green Belt local area 32. Sub area AC-13 potential to sub-divide.



SITE ID	ADDRESS	STREET	TOWN	SITE AREA	LAND TYPE	POTENTIAL YIELD (NET DWELLINGS)	POTENTIAL YIELD (COMMERCIAL sqm)	DELIVERABILITY	FINAL DELIVERABILITY COMMENTS
HS1/013	Sunbury Golf Course	Charlton Lane	Shepperton	45.75	NOT PDL GB	0	0	Not developable	Green Belt - local area 45 and 47; strongly performing
HS1/014	137	Upper Halliford Road	Shepperton	0.27	NOT PDL GB	0	0	Not developable	Green belt - local area 39; strongly performing
LS1/001	Linton Place	New Road	Shepperton	0.1	PDL GB	0	0	Not developable	Green Belt - local area 42; strongly performing
LS1/002	Land off Shepperton Road	Shepperton Road	Shepperton	46	NOT PDL GB	0	0	Not developable	Green Belt - local area 43; moderately performing
LS1/003	Land and Works off Littleton lane A	Shepperton Road	Staines	15	NOT PDL GB	0	0	Not developable	Green Belt - local area 43; moderately performing
LS1/004	Land off Staines Road	Staines Road	Staines	0.5	NOT PDL GB	0	0	Not developable	Green Belt - local area 34; strongly performing
LS1/005	Land east of Charlton Road	Charlton Road	Sunbury	9.4	NOT PDL GB	0	0	Not developable	Green Belt - local area 29; moderately performing
LS1/006	Land at Windmill Close	Windmill Close	Sunbury	0.75	NOT PDL GB	30	0	Not currently developable	Green Belt local area 29. Sub area AC-3 potential to sub-divide.
LS1/007	Land to South of Ashford Common Water Treatment Works	Charlton Road	Shepperton	5	MIXED	175	0	Not currently developable	Green Belt local area 29. Sub area AC-3 potential to sub-divide.
LS1/008	Staines Road Farm (Southern Site)	Laleham Road	Shepperton	1.527	NOT PDL GB	0	0	Not developable	Green Belt - local area 44; strongly performing
LS1/015	Staines Road Farm (Main Site)	Laleham Road	Shepperton	37.07	NOT PDL GB	0	0	Not developable	Green Belt - local area 42 and 44; strongly performing
LS1/016	Land North of B376	Shepperton Road	Laleham	71.06	NOT PDL GB	0	0	Not developable	Green Belt - local area 33; strongly performing
LS1/017	Land at Manor Farm and 126 Charlton Road	Charlton Road	Shepperton	1.73	MIXED	0	0	Not developable	Green Belt - local area 29; moderately performing
LS1/018	Land at Manor Farm	Charlton Road	Shepperton	0.568	NOT PDL GB	0	0	Not developable	Green Belt - local area 29; moderately performing
LS1/019	Land lying to west side of Charlton Lane	Charlton Lane	Shepperton	0.332	NOT PDL GB	0	0	Not developable	Green Belt - local area 42; strongly performing
LS1/020	Land lying to west of Charlton Road	Charlton Road	Shepperton	2.97	NOT PDL GB	0	0	Not developable	Green Belt - local area 25; moderately performing
LS2/001	Shepperton Studios	Studios Road	Shepperton	11	NOT PDL GB	0	0	Not developable	Green Belt - local area 16; moderately performing
RL1/007	Land off Worple Road	Worple Road	Staines	6.4	NOT PDL GB	0	0	Not developable	Green Belt - local area 27; strongly performing
RL1/008	Land to Rear of Ashford Road	Ashford Road	Staines	7.4	NOT PDL GB	0	0	Not developable	Green Belt - local area 27; strongly performing

SITE ID	ADDRESS	STREET	TOWN	SITE AREA	LAND TYPE	POTENTIAL YIELD (NET DWELLINGS)	POTENTIAL YIELD (COMMERCIAL sqm)	DELIVERABILITY	FINAL DELIVERABILITY COMMENTS
RL1/009	Waterside Nursery Limited	Staines Road	Laleham	4.3	PDL GB	0	0	Not developable	Green Belt - local area 27; strongly performing
SC1/009	Land to the North of M3 J1		Sunbury	6.3	NOT PDL GB	0	0	Not developable	Green Belt - local area 16; moderately performing
SC1/010	Land East of Groveley Road and Vicarage Road	Groveley Road and Vicarage Road	Sunbury	10.2	NOT PDL GB	0	0	Not developable	Green Belt - local area 16; moderately performing
SE1/014	Land to SE of Hanworth Road	Hanworth Road	Sunbury	2.31	NOT PDL GB	0	0	Not developable	Green Belt - local area 19; strongly performing
SE1/015	Kempton Park Racecourse	Staines Road East	Sunbury	94	MIXED	0	0	Not developable	Green Belt - local area 28; strongly performing
SH1/003	Land off Littleton Lane B	Littleton Lane	Staines	1.8	NOT PDL GB	0	0	Not developable	Green Belt - local area 52; strongly performing
SH1/004	Land off Thameside	Thameside	Staines	1.8	NOT PDL GB	0	0	Not developable	Green Belt - local area 52; strongly performing
SH1/005	Staines Road Farm (Eastern Site)	Laleham Road	Shepperton	5.037	NOT PDL GB	225	0	Not currently developable	Green Belt local area 46. Sub area AC-7 potential to sub-divide.
SN1/003	Land at Stanwell Farmhouse	Bedfont Road	Stanwell	0.42	PDL GB	0	0	Not developable	Green Belt - local area 6; strongly performing
SN1/004	Land at Birch Green/Staines Pumping Station (Site A)	Stanwell Moor Road	Staines	3.1	PDL GB	0	0	Not developable	Green Belt - local area 3; moderately performing
SN1/005	Land at Northumberland Close	Northumberland Close	Stanwell	1.62	NOT PDL GB	0	5,000	Not currently developable	Green Belt - local area 5 weakly performing (AC-1)
SN1/006	Land to the west of Long Lane and South of Blackburn Trading Estate	Long Lane	Stanwell	4.7	NOT PDL GB	0	14,500	Not currently developable	Green Belt - local area 5 weakly performing (AC-1)
SN1/007	Land at Green Acre Farm	Bedfont Road/Clare Road	Stanwell	14.7	NOT PDL GB	0	0	Not developable	Green Belt - local area 6; strongly performing
SN1/008	Land south of Southern Perimeter Road		Stanwell	22.6	NOT PDL GB	0	0	Not developable	Green Belt - local area 4; strongly performing
SN1/009	Land at Poyle Meadows	Horton Road	Stanwell Moor	1.87	NOT PDL GB	0	0	Not developable	Green Belt - local area 1; moderately performing
SN2/003	Land north of	Horton Road	Stanwell Moor	0.8	NOT PDL GB	0	0	Not developable	Green Belt - local area 2a; moderately performing
SN4/001	Land at	Spout Lane	Stanwell	3.3	PDL GB	0	0	Not developable	Green Belt - local area 2a; moderately performing
ST1/013	Land at Vicarage Road	Wraysbury Road	Staines	2.6	NOT PDL GB	0	0	Not developable	Green Belt - local area 11; moderately performing

SITE ID	ADDRESS	STREET	TOWN	SITE AREA	LAND TYPE	POTENTIAL YIELD (NET DWELLINGS)	POTENTIAL YIELD (COMMERCIAL sqm)	DELIVERABILITY	FINAL DELIVERABILITY COMMENTS
ST1/014	Thames Water Training Centre	Coppermill Road	Stanwell	6.5	PDL GB	0	0	Not developable	Green Belt - local area 1; moderately performing
ST1/015	Land at Birch Green/ Staines Pumping Station (Site B)	London Road	Staines	0.52	NOT PDL GB	0	0	Not developable	Green Belt - local area 15; moderately performing
ST1/016	Land at Birch Green/ Staines Pumping Station (Site C)	London Road	Staines	2.5	NOT PDL GB	0	0	Not developable	Green Belt - local area 15; moderately performing
ST1/017	Hengrove Farm	London Road	Staines	23.24	NOT PDL GB	0	0	Not developable	Green Belt - local area 14; strongly performing

#### Appendix 4 - Under-delivery Calculation

Year	Planning permissions granted	Units	Planning permissions expired	Units	Expired units as % of units granted
2011/12	47	283	4	5	1.77%
2012/13	35	388	6	4	1.03%
2013/14	59	351	1	1	0.28%
2014/15	57	514	6	11	2.14%
2015/16	68	543	4	7	1.29%
2016/17	54	634	10	16	2.52%
<b>Average</b>					<b>1.51%</b>

## Appendix 5 – Estimated delivery of SLAA sites

### Deliverable Sites - Years 1-5<sup>6</sup>

SITE ID	ADDRESS	STREET	FINAL YIELD (NET DWELLINGS)	FINAL YIELD (COMMERCIAL sqm)	FINAL TIMEFRAME	DELIVERABILITY
AC1/001	Land adjoining	Feltham Hill Road and Poplar Road	51	0	Next 5 years	Deliverable
AC1/004	251-253	Staines Road West	5	0	Next 5 years	Deliverable
AC2/004	381-385	Staines Road West	12	0	Next 5 years	Deliverable
AS1/001	Tesco Extra	Town Lane	50	0	Next 5 years	Deliverable
AS1/004	Happy Landing PH	Clare Road	30	0	Next 5 years	Deliverable
AS1/005	524-538	London Road	58	0	Next 5 years	Deliverable
AT1/001	Hitchcock and King	Stanwell Road	200	0	Next 5 years	Deliverable
AT1/007	HSBC, 47-49	Church Road	6	0	Next 5 years	Deliverable
AT1/009	Allington House, 3	Station Approach	8	0	Next 5 years	Deliverable
AT1/010	Harper House	Fordbridge Road	15	0	Next 5 years	Deliverable
AT2/001	145-149	Stanwell Road	5	0	Next 5 years	Deliverable
AT3/001	Headline House	Stanwell Road	10	0	Next 5 years	Deliverable
AT3/002	55a	Woodthorpe Road	8	0	Next 5 years	Deliverable
AT3/003	Former Brooklands College	Church Road	357	619	Next 5 years	Deliverable
AT3/004	8 - 12	Clarendon Road	10	0	Next 5 years	Deliverable
AT3/005	Land to r/o Imtech House, 33-35	Woodthorpe Road	26	0	Next 5 years	Deliverable
AT3/007	Ashford Multi-storey car park	Church Road	50	0	Next 5 years	Deliverable
HS1/011	The Bugle Returns Public House, 173	Upper Halliford Road	8	0	Next 5 years	Deliverable
LS1/021	430	Staines Road West	5	0	Next 5 years	Deliverable
LS3/001	r/o 151-153	Charlton Road	6	0	Next 5 years	Deliverable
RL1/001	Staines Ex Servicemen Club, 6	Laleham Road	10	0	Next 5 years	Deliverable
SC1/002	Apex Car Rental, 115	Staines Road West	20	0	Next 5 years	Deliverable
SC1/003	147	Staines Road West	20	0	Next 5 years	Deliverable
SC1/004	Sunbury Fire Station	Staines Road West	25	0	Next 5 years	Deliverable
SC1/006	Tesco Extra	Escot Road	50	0	Next 5 years	Deliverable
SC1/007	Monkey Puzzle House, 69-71	Windmill Road	14	0	Next 5 years	Deliverable

<sup>6</sup> This does not include those sites that are already under construction (764 as of 1<sup>st</sup> January 2018).

SITE ID	ADDRESS	STREET	FINAL YIELD (NET DWELLINGS)	FINAL YIELD (COMMERCIAL sqm)	FINAL TIMEFRAME	DELIVERABILITY
SC1/012	T Mobile (UK) Ltd, Sunbury One	Brooklands Close	0	2014	Next 5 years	Deliverable
SE1/002	69-71	Staines Road East	10	0	Next 5 years	Deliverable
SE1/004	12	Park Road	6	0	Next 5 years	Deliverable
SE1/005	Benwell House	Green Street	77	0	Next 5 years	Deliverable
SE1/007	St Pauls Catholic College	Green Street	7	0	Next 5 years	Deliverable
SE1/012	Loyola Centre	Green Street	6	0	Next 5 years	Deliverable
SE1/016	Inglewood Hall	Green Street	6	0	Next 5 years	Deliverable
SE1/021	1-3	Station Road	60	0	Next 5 years	Deliverable
SH1/007	7-11	Manygate Lane	22	0	Next 5 years	Deliverable
SH2/002	42	High Street	6	313	Next 5 years	Deliverable
SH3/003	Halliford Studios Ltd	Manygate Lane	24	0	Next 5 years	Deliverable
SN1/002	Camgate Centre	Long Lane	0	5000	Next 5 years	Deliverable
SN1/010	Hithermoor Farm, 6	Farm Way	23	0	Next 5 years	Deliverable
SN2/001	Minerva House	Minerva Close	11	0	Next 5 years	Deliverable
SS1/002	White House	Kingston Road	55	0	Next 5 years	Deliverable
ST1/022	39	Gresham Road	6	0	Next 5 years	Deliverable
ST1/025	17 - 51	London Road	253	12,787	Next 5 years	Deliverable
ST1/029	Surrey CC Buildings	Burges Way	29	0	Next 5 years	Deliverable
ST1/030	Fairways Day Centre	Knowle Green	36	0	Next 5 years	Deliverable
ST1/032	61-63	High Street	5	0	Next 5 years	Deliverable
ST1/033	Bridge House	Bridge Street	9	0	Next 5 years	Deliverable
ST1/034	10A	Thames Street	10	0	Next 5 years	Deliverable
ST1/037	Thameside House	South Street	120	0	Next 5 years	Deliverable
ST2/001	Glenthorne, 33	Rookery Road	19	0	Next 5 years	Deliverable
ST3/001	62	Kingston Road	5	0	Next 5 years	Deliverable
ST3/004	34-36 (OAST House) /Car park	Kingston Road	180	0	Next 5 years	Deliverable
ST3/006	Renshaw Trading Estate	Mill Mead	275	0	Next 5 years	Deliverable
ST3/009	Heliting House, 4	London Road	35	0	Next 5 years	Deliverable
ST3/010	15	London Road	8	0	Next 5 years	Deliverable

SITE ID	ADDRESS	STREET	FINAL YIELD (NET DWELLINGS)	FINAL YIELD (COMMERCIAL sqm)	FINAL TIMEFRAME	DELIVERABILITY
ST4/001	Jewsons	Moor Lane	45	0	Next 5 years	Deliverable
ST4/002	Car Park, Hanover House & Sea Cadet Building	Bridge Street	300	0	Next 5 years	Deliverable
ST4/004	96-104	Church Street	48	0	Next 5 years	Deliverable
ST4/005	20	Bridge Street	9	0	Next 5 years	Deliverable
ST4/008	Staines Town Hall	Market Square	13	0	Next 5 years	Deliverable
ST4/011	Thames Lodge	Thames Street	65	0	Next 5 years	Deliverable
ST3/011	Old Police Station, 2	London Road	14	0	Next 5 years	Deliverable

#### Developable Sites - Years 6-10 & Years 11-15

SITE ID	ADDRESS	STREET	FINAL YIELD (NET DWELLINGS)	FINAL YIELD (COMMERCIAL sqm)	FINAL TIMEFRAME	DELIVERABILITY
AC3/002	BP International	Chertsey Road	200	0	Years 6-10	Developable
AE3/006	158-166	Feltham Road	75	0	Years 6-10	Developable
AS2/002	Works adj	Harrow Road	36	0	Years 6-10	Developable
SE1/001	Park House, 17-19	Park Road	10	0	Years 6-10	Developable
SE1/020	Sunbury Adult Education Centre	The Avenue	15	0	Years 6-10	Developable
SH1/010	Shepperton Library	High Street	6	600	Years 6-10	Developable
SH1/015	Shepperton Youth Centre	Laleham Road	19	0	Years 6-10	Developable
SH3/005	Walton Bridge Garage	Walton Bridge Road	8	0	Years 6-10	Developable
ST1/006	233-269	London Road	50	0	Years 6-10	Developable
ST1/028	Leacroft Centre	Leacroft	20	0	Years 6-10	Developable
ST2/003	Spelthorne Leisure Centre and adjoining playing field	Knowle Green	240	0	Years 6-10	Developable
ST4/010	Riverside Surface Carpark	Thames Street	100	0	Years 6-10	Developable
ST2/006	Builders Yard	Gresham Road	100	0	Years 6-10 Years 11-15	Developable
ST4/009	The Elmsleigh Centre and adjoining land	South Street	650	21,550	Years 6-10 Years 11-15	Developable
AC2/003	445	Staines Road West	13	0	Years 11-15	Developable
AE3/003	71-75	Feltham Road	5	0	Years 11-15	Developable
AE3/005	28-44	Feltham Road	23	0	Years 11-15	Developable

SITE ID	ADDRESS	STREET	FINAL YIELD (NET DWELLINGS)	FINAL YIELD (COMMERCIAL sqm)	FINAL TIMEFRAME	DELIVERABILITY
AS1/003	Staines Fire Station	Town Lane	30	0	Years 11-15	Developable
AS2/001	Ashford Youth Club	Kenilworth Road	10	0	Years 11-15	Developable
HS1/001	R/O The Goat Public House, 47	Upper Halliford Road	5	0	Years 11-15	Developable
HS2/001	The Grizzly Bear Public House, 101	Nursery Road	5	0	Years 11-15	Developable
LS2/004	The Bull, 152	Laleham Road	10	0	Years 11-15	Developable
LS3/004	Ashborne Hall	Littleton Road	5	0	Years 11-15	Developable
LS3/005	404-412	Staines Road West	18	0	Years 11-15	Developable
RL1/002	Works, 20	Ruskin Road	5	0	Years 11-15	Developable
RL1/006	43-44	Thames side	10	0	Years 11-15	Developable
SC1/005	Sunbury Cross Ex Services Association Club	Crossways	20	0	Years 11-15	Developable
SC1/008	Adj. 2	Spelthorne Grove	7	0	Years 11-15	Developable
SE1/003	77	Staines Road East	45	0	Years 11-15	Developable
SE1/006	Saxon House	Downside	7	0	Years 11-15	Developable
SE1/008	Telephone Exchange	Green Street	12	0	Years 11-15	Developable
SE1/010	Ritzbury House, Bridge Foot	Green Street	6	0	Years 11-15	Developable
SE1/011	75-77	Green Street	6	0	Years 11-15	Developable
SE1/019	Sunbury Social Services Centre	108 Vicarage Road	11	0	Years 11-15	Developable
SE2/001	Strata House	Batavia Road	6	0	Years 11-15	Developable
SH3/004	Shepperton Autoway	Walton Bridge Road	10	0	Years 11-15	Developable
SN1/012	Stanwell Bedsits	De Havilland Way	100	0	Years 11-15	Developable
SS1/004	Ashman Service Station, 286	Kingston Road	5	0	Years 11-15	Developable
ST1/003	Denby	Stanwell New Road	5	0	Years 11-15	Developable
ST1/031	Thameside Arts Centre	Wyatt Road	15	0	Years 11-15	Developable
ST1/035	44A	Gresham Road	8	0	Years 11-15	Developable
ST1/036	Universal Tyre Co Ltd	Laleham Road	12	0	Years 11-15	Developable
ST2/004	The Retreat	Pinewood Drive	8	0	Years 11-15	Developable
ST2/005	Friendship House, 49-51	Gresham Road	9	0	Years 11-15	Developable



SITE ID	ADDRESS	STREET	FINAL YIELD (NET DWELLINGS)	FINAL YIELD (COMMERCIAL sqm)	FINAL TIMEFRAME	DELIVERABILITY
<b>ST2/008</b>	Staines Tinware	Langley Road	18	0	Years 11-15	Developable
<b>ST3/002</b>	Florida Court	Station Approach	5	0	Years 11-15	Developable
<b>ST3/003</b>	Land off	Pullmans Place	14	0	Years 11-15	Developable
<b>ST3/007</b>	140-154	High Street	7	0	Years 11-15	Developable
<b>ST3/008</b>	Burma House	Station Path	14	0	Years 11-15	Developable

## Appendix 6 – Small sites allowances

### Small sites

The NPPF allows Local Planning Authorities (LPAs) to make allowances for small sites. Small sites are known as windfall sites within the NPPF which states “*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*”.

Small scale windfall sites have consistently formed part of the housing supply for Spelthorne and so the SLAA will continue to include a windfall allowance as these sites continue to provide a reliable source of supply.

For the purpose of the SLAA, windfall sites in Spelthorne are considered to be sites able to provide up to 4 net dwellings. Spelthorne has historically included sites of less than 0.4 ha as windfall, however in order to account for smaller sites that may be able to accommodate high density development where appropriate, any sites considered able to deliver fewer than 5 net units are taken account of through future windfall supply. This is consistent with the windfall allowance used in the Runnymede SLAA, who sit within the same Housing Market Area. This will help support the opportunity for joint working on the SLAA in the future.

Small sites have been broken down into specific development types; conversion (residential to residential), change of use (non-residential to residential), new build and redevelopment. This approach will seek to ensure that there is no double counting and those sites that are considered capable of delivering as part of the housing supply are identified.

In order to determine the potential supply of housing through a windfall allowance over the plan period, completions from April 2012 to March 2017 have been analysed. Based on past trends an annualised figure for windfall sites has been identified for sites that are capable of delivering fewer than 5 net units.

The annualised figures for windfall completions over the above stated period is 134 and are shown in Table 2.

Table 2: Windfall completions in Spelthorne

Year	Conversion	Change of Use	New Build	Redevelopment	Total
2012 - 2013	5	1	11	5	22
2013 - 2014	2	0	9	9	20
2014 - 2015	20	6	11	11	48
2015 - 2016	0	8	9	10	27
2016 - 2017	3	10	1	3	17
Total	<b>30</b>	<b>25</b>	<b>41</b>	<b>38</b>	<b>134</b>

Table 2 shows that there is a consistent delivery of smaller sites and therefore the inclusion of a windfall allowance in the housing land supply is justified.

It is clear from Table 2 that windfalls have historically made a small but consistent contribution towards the Spelthorne Housing Land supply. There is no reason to believe that this would not continue, particularly in light of policy as contained within the NPPF, especially with

regards to the presumption in favour of sustainable development. It is thus considered that a windfall allowance for small sites should therefore be included in the SLAA.

It is considered that a windfall allowance per year is realistic, having been based on past trends over a reasonable period of time (five years). Based on the data collected for the SLAA, there is no evidence to suggest a significant downtrend in small-scale windfalls. Therefore it is considered appropriate to take forward the annual average figure of 27 dwellings over the 15 year plan period as allowance. This would provide for 135 units which would form part of the housing supply through the small sites allowance.

### **Prior notifications**

Prior approval notifications can also make a contribution towards the housing supply. Like small-scale windfalls, small scale prior approvals are not considered through the SLAA. However they are included within the trajectory to ensure that there is no ‘double-counting’ of sites.

Alongside the small site windfall allowance, an allowance will be included for dwellings likely to arise from office to residential conversions carried out under the General Permitted Development order (GPDO). This allowance is informed by the number of prior notifications approved up to and including January 2017. This also includes the 2016 amendment to the GPDO referred to as the (General Permitted Development) (England) (Amendment) Order 2016. This amendment made permanent the existing temporary right to change a building used as an office into residential use.

Office to residential conversions under the GPDO are less likely to be identified through the SLAA as these prior notification sites do not require planning permission and can be approved as permitted development. As such they are less likely to be identified for housing. Therefore, it is considered that Prior Notification sites should be identified and considered as part of a separate allowance. In conformity with the windfall allowance’s historic analysis in Spelthorne, sites in excess of 9 units will not be accounted for as part of the allowance.

The GPDO amendment was introduced on 30 May 2013 and therefore completions from this date will only be considered as part of the allowance.

Table 3: Windfall Office to Residential Prior Notification completions 2013-2017

Year (since 30 May 2013)	No. of units completed through PNs (less than 10 units)
<b>2013-2014</b>	0
<b>2014-2015</b>	9
<b>2015-2016</b>	4
<b>2016-2017</b>	0

Table 3 shows that there were a total of 13 units completed under the Prior Notification regime for the selected years for conversions below 10 units. This provides an annual average of 3 units generated through Prior Notifications of 0-9 units. When taken forward over the plan period of 15 years, this equates to a total figure of 49 dwellings created. This will be taken forward as the allowance.