

# Five Year Housing Land Supply Annual Review

April 2018 to 2023





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## Executive Summary

This document sets out Mole Valley District Council's (MVDC) estimate of the supply of deliverable sites for housing development in the district over the five years from April 2018 to 2023. When compared to the housing requirement over the same period, this determines whether MVDC can show it has a supply of housing land needed to meet housing requirements over the next five years.

MVDC's five year housing land supply is calculated on the basis of five components: sites allocated and reserved in adopted Local Plan documents; sites on the Brownfield Register; developments under construction; proposed developments with planning permission or similar, and; an allowance for windfall sites. These components show there is a total supply of 1,246 net dwellings between 2018 and 2023.

MVDC is preparing a new Local Plan, which will establish a new housing target upon which the five year housing requirement will be based. The new Local Plan is not yet at a stage where a housing target can be identified. In the interim, and in accordance with the National Planning Policy Framework (NPPF), MVDC's latest housing need figure, based on household projections, will be used. However, draft revisions to the NPPF propose to change how the housing need figure is calculated. This five year land supply review therefore uses two housing need figures: the Objectively Assessed Housing Need (OAHN) derived from MVDC's latest Strategic Housing Market Assessment (SHMA) as per the current NPPF; and Local Housing Need (LHN) figure derived from the standardised methodology as per the draft revised NPPF. Against OAHN and LHN, MVDC has a housing requirement, including a 5% buffer, of 2,184 and 2,510 net dwellings respectively over a five year period.

When the delivery supply of 1,246 net dwellings is compared against the two housing requirement figures, there is a shortfall of 938 and 1,264 net dwellings over a five year period. This equates to a 2.85 and 2.48 years supply respectively.

As such, MVDC is unable to demonstrate that there is a five year supply of land for housing development in the District. However, the District is tightly constrained by Green Belt policy and other nationally significant constraints. This has been acknowledged by planning inspectors in recent appeal decisions relating to sites in Mole Valley, and consequently should be taken into account in the planning balance when assessing the weight to be attached to the lack of five year housing supply.

# 1. Policy Context

## National Policy

- 1.1. The National Planning Policy Framework (NPPF) was published by the Government in 2012 and sets out national planning policy for England. On delivering a wide choice of high quality homes, the NPPF states, in paragraph 47, that:

*“To boost significantly the supply of housing, local planning authorities should...  
...identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.”*

- 1.2. Demonstration of a five year supply of housing land is a material consideration when determining housing applications and appeals. Where the local planning authority cannot demonstrate a five year housing land supply, paragraph 49 in the NPPF says relevant Local Plan policies for the supply of housing should not be considered up-to-date. Planning applications for housing development should be considered in the context of the presumption in favour of sustainable development, as set out in paragraph 14 in the NPPF.

- 1.3. In support of the NPPF, the Planning Practice Guidance (PPG) states:

*“Local planning authorities should have an identified five year housing supply at all points during the plan period. Housing requirement figures in an up-to-date adopted Local Plans should be used as the starting point for calculating the five year supply. Considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light. It should be borne in mind that evidence which dates back several years, such as those drawn from revoked regional strategies, may not adequately reflect current needs.*

*Where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered. But the weight given to these assessments should take into account of the fact they have not been tested or moderated against relevant constraints. Where there is no robust recent assessment of full housing needs, the household projections published by the Department for Communities and Local Government should be used as the starting point, but the weight given to these should take account of the fact they have not been tested (which could evidence a different housing requirement to the projection, for example because past events that affect the projection are unlikely to occur again or because of market signals) or moderated against relevant constraints (for example environmental or infrastructure).”*

## Draft Revised National Policy

- 1.4. On 5 March 2018, the Government published and commenced consultation on a draft revised NPPF. The document contains a number of changes, including to the calculation of the five year supply, which are set out below.
- 1.5. Paragraph 74 proposes that local planning authorities identify a five year supply against their Local Housing Need (LHN) where the strategic plan is more than five years old. The supply should in addition include a buffer of 5% however this can change to either 10% or 20%: 10% where the local planning authority wish to demonstrate a confirmed five year supply once in a given year through an annual position statement (or recently adopted plan); or 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.
- 1.6. Paragraph 76 in the draft revised NPPF also says a five year supply can be demonstrated when established in a recently adopted plan or in a subsequent annual position statement which: has been produced through engagement with developers and others who have an impact on delivery, and been considered by the Secretary of State; and incorporates all the recommendations of the Secretary of State, where the position of specific sites could not be agreed during the engagement process. Footnote 28 establishes that in this context, a plan adopted between 1 May and 31 October is considered 'recently adopted' until 31 October of the following year, and a plan adopted between 1 November and 30 April is 'recently adopted' until 31 October that year.
- 1.7. Footnote 29 says that from November 2018, the Housing Delivery Test will determine whether the five year supply incorporates a 20% buffer (instead of 5% or 10%). The 20% buffer would apply when the Housing Delivery Test indicates delivery was below 85% of the housing requirement.
- 1.8. Paragraph 69 ensures that at least 20% of sites identified for housing by a local authority in their plan are small sites of half a hectare or less. The same paragraph also expects local planning authorities to support the development of windfall sites through their policies and decisions. The draft revised NPPF also amends the definition of windfall sites. It is as yet unclear if these policy changes on small sites and windfall will impact on the calculation of five year housing land supply.
- 1.9. The Government also published draft updates to PPG on 12 March 2018 including a section on five year supply to support the proposed changes in the draft revised NPPF. The draft PPG includes what information annual reviews of five year land supply, including annual position statements need to include. Assessments will be expected to include information on:
  - Sites with detailed planning permission- details of numbers of homes under construction and completed each year; and where delivery has not progressed as expected, a commentary indicating the reasons for delays to commencement on site or slow build out rates;
  - Small sites- details of current planning status and record of completions and homes under construction by site;
  - Sites with outline consent or allocated in adopted plans or with permission in principle identified on Part 2 of brownfield registers – information about

current planning status, timescales and progress towards detailed permission;

- Permissions granted for windfall development by year and how this compares with the windfall allowance;
- Details of demolitions and planned demolitions which will have an impact on net completions;
- Total net completions from plan base date by year (broken down into types of development e.g. affordable housing); and
- The five year land supply calculation clearly indicating buffers and shortfalls and number of years of supply.

1.10. The revised NPPF is due to be published in summer 2018. As such, at the present time, only limited weight can be attached to the policies of the draft revised NPPF. MVDC's five year land supply position may be reviewed again once a revised NPPF is in place and the proposed Housing Delivery Test is published.

## Local Policy

1.11. Mole Valley District Council has an adopted housing target of 3,760 net dwellings over a twenty year period from 2006 to 2026, as set out in the Core Strategy adopted in 2009. This housing target was set by the South East Plan, a regional spatial strategy for South East England region, which was published by the Government in May 2009. The South East Plan has since been revoked and the NPPF now requires local planning authorities to set their own housing targets using their evidence base. The evidence underpinning the Council's adopted Core Strategy, including its housing requirement, is pre-NPPF and is therefore considered out of date.

1.12. In accordance with the current NPPF, the Council's Objectively Assessed Housing Need (OAHN), derived from the Kingston upon Thames and North East Surrey Authorities Strategic Housing Market Assessment (SHMA) 2016, is considered the most appropriate and available figure for calculating the five year housing land supply.

1.13. The draft revised NPPF and PPG seek to establish a standardised methodology to determine Local Housing Need (LHN) for a local authority area. The subsequent LHN figure will be different to the OAHN published in the 2016 SHMA. Implementation measures put forward in the draft revised NPPF mean that policies of the current NPPF will apply for the purpose of examining plans where those plans are submitted on or before a date six months after the publication of the revised NPPF.

1.14. The revised NPPF is due to be published in summer 2018; subsequently, the district's housing target in MVDC's new Local Plan will be based on LHN. At the present time however, the LHN is draft national planning policy thus presently carries limited weight. As such, this review will determine MVDC's five year supply against both the OAHN and LHN.

1.15. It should be noted however that both the OAHN and LHN have not been tested or moderated against relevant constraints. This will be a key consideration in

the determination of planning applications for housing development, as set out in the section of PPG quoted in paragraph 1.3.

- 1.16. In terms of the weight to be attached to the assessment of housing need, a recent appeal decision<sup>1</sup> is of some relevance. At the time of the decision, the LHN figure had not been published and the OAHN was the latest housing need figure for Mole Valley. The Planning Inspector stated in paragraphs 37 and 39 respectively:

*“The OAHN has not been tested through a Local Plan examination and the Council argues that the District is tightly constrained by Green Belt and AONB designations. It estimates that only some 5% of land outside of built up areas is unconstrained by restrictive policies of the type set out in Footnote 9 to Framework paragraph 14. Once the relevant policies are applied, it considers that the final housing target will be reduced considerably. The weight to be attached to the OAHN figure should take into account these circumstances.*

*Neither party has quantified the extent to which the OAHN may need to be adjusted and it is not for the decision maker in Section 78 appeals to undertake that exercise. Nevertheless, it seems to me that the ‘policy on’ housing figure is likely to be materially less than the OAHN figure. This would reduce the extent of the shortfall and, therefore, the weight to be attached to the OAHN figure.”*

- 1.17. In light of the constraints in the district and the likelihood the ‘policy on’ housing figure will be less than the OAHN, the weight attached to the OAHN and LHN figures should be reduced.
- 1.18. MVDC is currently preparing a new Local Plan, which when concluded will establish a new housing target upon which a new five year housing requirement will then be based.

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<sup>1</sup> Against the refusal of permission for MO/2016/0177/PLA at Stane Gate, Stane Street, Ockley, Surrey, RH5 5TP, PINS ref APP/C3620/W/16/3155493



## 2. Identifying Supply Components & Method for Assessment

2.1. Local planning authorities are required to identify a supply of specific, deliverable sites for years one to five of the plan. Footnote 11 of the current NPPF states that:

*“To be considered deliverable, sites 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 and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.”*

2.2. The glossary of the draft revised NPPF expands on this further, stating that:

*“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. Small sites, 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 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.”*

2.3. The supply of sites also includes permitted development that doesn't require planning permission where there is an increase in dwellings. Such permitted development includes changes of use of commercial to residential as well as conversions of residential buildings to create more dwellings i.e. splitting a detached house into two semi-detached houses. The most prominent permitted development was introduced in May 2013 for the permitted change of use from offices to residential. These developments have made a significant contribution to the districts housing completions and supply in recent years. For more information, look at MVDC's latest Authority Monitoring Report (AMR).

2.4. The NPPF also acknowledges an allowance for windfall sites can be included in the five year supply. This review does include an allowance for windfall in its housing land supply, with the justification, methodology and calculation set out in the next chapter.

2.5. In preparing this review of housing land supply, the following sites and development proposals have been assessed:

- Sites allocated and reserved in the District's Local Plan that are expected to be delivered in five years.
- Sites on MVDC's Brownfield Register expected to be delivered in five years.
- Identify all developments with planning permission or similar, of five or more net dwellings that are under construction or not yet commenced as of 31 March 2017.

- Identify all developments with planning permission or similar, of between one and four net dwellings that are under construction or not yet commenced as of 31 March 2017.
- An allowance for small site windfalls on previously developed land in years four and five of the five year supply.

2.6. The amount of dwellings to be delivered from each component is set out in the next chapter.

### 3. Assessment of Deliverable Sites

#### Sites allocated and reserved in the Local Plan

- 3.1. The Mole Valley Local Plan 2000 (MVLP) allocated three sites for housing development of which two are now complete. The third site on Land at Murreys Court in Ashted was included, although at the time its availability was uncertain. To date, this position remains unchanged and no capacity is identified in the five year supply.
- 3.2. The MVLP also identified five reserve housing sites, of which three have been built upon. Neither of the two remaining reserve housing sites, Land fronting Clare Crescent in Leatherhead and Land between Glenfield Close and Ridge Close in Strood Green, has planning permission for development. However, on both sites there are uncertainties regarding the deliverability of development within a five year period.
- 3.3. The Dorking Town Area Action Plan (DTAAP) allocated five sites for housing development. All five sites have received planning permission, with two sites now completed and two currently under construction. The three allocated sites that have unimplemented planning permission or are under construction all propose development for five or more net dwellings. As such, these sites are contained within the 'development for five or more net dwellings' component, so are listed in Appendix 1.
- 3.4. At one of the completed sites allocated in the DTAAP, Land at Federated House, the whole of the allocated area has not been developed. As such there is the potential to accommodate further development on this site. However, a planning application, MO/2016/1452, for 23 apartments on this site was refused because development would result in overdevelopment of the site and would have an unacceptably unneighbourly impact. Therefore, it's considered further development of this site is unsuitable and for that reason is also undeliverable.
- 3.5. MVDC has four made Neighbourhood Developments Plans (NDPs), however only the Capel Parish NDP allocates sites for residential development. It allocates two sites: Land at Old Horsham Road and Surrey Hills Hotel, both in Beare Green. Only the Surrey Hills Hotel site is considered deliverable within the next five years as there are problems with the availability of the Old Horsham Road site. The Surrey Hills Hotel site is expected to contribute 10 net dwellings<sup>2</sup>.
- 3.6. Due to allocated and reserved sites being either built out or there being issues with deliverability, only one allocated site, at Surrey Hills Hotel in Beare Green is considered deliverable. As a consequence, this component contributes 10 net dwellings (the capacity of the Surrey Hills Hotel site) to the five year supply.

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<sup>2</sup> A planning application for 10 net dwellings, MO/2017/2058, was granted planning permission on 14 June 2018 (after the 31 March 2018 base date of this review).

## **Brownfield Land Register**

3.7. There are four sites on the MVDC's Brownfield Land Register that have not already received planning permission. These sites are:

- Bull Hill, Leatherhead;
- Claire House and James House, Leatherhead;
- Sorting Office, Leatherhead, and;
- Grove Corner, Bookham

3.8. Bull Hill is owned by MVDC with development to take place as part of the Transform Leatherhead town centre regeneration programme, however MVDC's current timeframe doesn't expect procurement for a construction partner to take place until 2022, and therefore it is likely the development won't commence until at least 2023. The Sorting Office is used by Royal Mail and there is no prospect that the site will become available within the next five years. As such, it's considered that only Claire House and James House, and Grove Corner are deliverable in the next five years. The two sites have the potential to contribute a combined total of 30 net dwellings to the five year supply.

## **Developments for five or more net dwellings**

3.9. At 31 March 2018, there were 44 sites comprising five or more dwellings. An assessment of the suitability, availability and achievability including viability has been undertaken for each development to determine their deliverability, thus their inclusion in the five year supply. This approach is used in the Strategic Housing Land Availability Assessment and accords with the NPPF and PPG. As a result, it is considered 803 net dwellings are deliverable over the next five years from this source. Each site, with evidence for their deliverability, is shown in Appendix 1.

## **Developments of between one and four net dwellings**

3.10. Of the developments between one and four net dwellings, 78 net dwellings were under construction as of March 2018. A further 194 net dwellings could come forward from developments not yet commenced; however previous analysis has indicated a small site non-implementation rate of 10%. This rate is based on dwellings not built in a five year period and planning permissions which have expired. The rate reduces the number of dwellings from developments not yet commenced to 175 net dwellings. Combining this 175 figure with the dwellings under construction yields a deliverable capacity of 253 net dwellings from this component. The sites that make up this component are not individually identified in this statement.

## **Windfall allowance**

3.11. The National Planning Policy Framework (NPPF) states windfall sites are those that have not been specifically identified as available in the Local Plan process. Windfall sites normally comprise of previously developed (brownfield) land,

as defined in the NPPF<sup>3</sup>, which has unexpectedly become available for development.

- 3.12. MVDC considers it has compelling evidence to justify making an allowance for windfall in the five year supply. Historic delivery rates show the delivery of sites of one to nine net dwellings is consistent and relatively unaffected by the downturn in the housebuilding industry following the 2008 global financial crisis. MVDC therefore uses completed developments that comprise 1 to 9 net additional dwellings as the basis to calculate a windfall allowance.
- 3.13. An allowance for windfall sites is only made for years four and five of the five year supply. A windfall assumption is not included in the first three years as planning permissions expire after three years so including a windfall allowance before current planning permission expire could result in double counting.
- 3.14. Having regard to these factors, the Council considers it can justify including a windfall allowance for sites of 1 to 9 net dwellings in years four and five of the five year supply. This has been the approach taken since adoption of the Core Strategy and continues to be used in the Council's annual review of five year housing land supply.
- 3.15. The report on the examination into the Council's Core Strategy, published July 2009, found that there were genuine local circumstances that justifies making an allowance for windfall in the later stages of the plan period. The Core Strategy covered a period of 20 years from 2006 to 2026 so it is now reasonable in 2018, year 12 of the plan period, to make an allowance for windfall. In addition to this, the report on the examination of the Dorking Town Area Action Plan, published November 2012, stated the Council's most recent five year housing land supply at the time included a realistic and justified allowance for windfalls.
- 3.16. Appendix 2 shows that in 2017/18, there were a total of 111 net dwellings completed on sites comprising of 1 to 9 net dwellings built on previously developed land. Combining this figure with annual figures for the last ten years, between 2008 and 2018, gives a total of 754 dwellings. Taking an average for the ten year period gives the Council a windfall allowance of 75 dwellings per annum. As previously stated, the windfall allowance applies to years four and five of the five year supply, so the annual windfall allowance is multiplied by two. This means the windfall allowance included in the five year supply amounts to 150 net dwellings.

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<sup>3</sup> The NPPF defines previously developed land as 'land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. The definition excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time'. A recent legal judgement determined residential gardens not in the built-up area are not excluded from this definition. As such, residential garden land not in built-up areas is considered to be previously developed land.

## Summary

3.17. Table 1 below summarises the contribution of supply from the aforementioned components to the five year supply. It shows a total of 1,246 net dwellings are deliverable over the next five years.

Table 1: Summary of the five year housing land supply

Component	Net dwellings deliverable in the next five years
Allocated / reserved sites in the Local Plan	10
Brownfield Land Register	30
Developments of five or more net dwellings	803
Development of between one and four net dwellings	253
Windfall allowance in years four and five	150
Total five year housing land supply	1,246

## 4. Calculating the Housing Requirement

- 4.1. In previous statements, the five year requirement was based on the housing requirement of the adopted Core Strategy to deliver 3,760 net dwellings over a twenty-year period from 2006 to 2026, which equates to 188 net dwellings per annum (dpa). However, it is recognised that the housing requirement in MVDC's adopted Core Strategy is pre-NPPF and is considered to be out of date.
- 4.2. Due to the proposed changes to NPPF and calculation of the housing need figure, this review will set out two housing requirement and five year land supply figures using the OAHN as per the current NPPF, and the Local Housing Need (LHN) as per the standardised methodology from the draft revised NPPF. However, the weight given to these need figures as the housing requirement should take into account that it they are untested and not moderated against constraints, unlike an examined and adopted housing target.
- 4.3. The latest SHMA, published 2016, states that the OAHN for the district is 7,814 net dwellings between 2015 and 2035, which equates to 391dpa. Using the standardised methodology set out in the draft revised NPPF, used to calculate LHN, results in a figure of 4,413 net dwellings between 2016 and 2026, which is annualised as 441dpa.
- 4.4. Paragraph 47 in the current NPPF requires local planning authorities to have a buffer of 5% above the five year requirement (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing this buffer should be increased to 20% to provide a realistic prospect of achieving the planned supply.
- 4.5. While the Council is not delivering against either housing need figure, it was not until earlier this year that the Council acknowledged the Core Strategy is out of date and used the OAHN to calculate its five year supply. Furthermore delivery continues to exceed the annualised Core Strategy target. As outlined above, a new Local Plan is under preparation, which will set a new housing target and include new site allocations to bring forward an increased supply of housing land. In the meantime, it is not considered that there is any evidence of "persistent" under delivery and therefore the 5% buffer is considered appropriate. This position will be reviewed following the publication of the new NPPF and Housing Delivery Test.
- 4.6. Tables 2 & 3 below sets out the calculation of the five year housing requirement, using OAHN and LHN respectively, taking into account past delivery and the 5% buffer.

Table 2: Calculating the five year housing requirement based on OAHN

Component	Net dwellings	Average net dwellings per annum
Housing requirement 2015 to 2035	7,814	391
Net additions to stock 2015 to 2018	746	249
Residual requirement 2018 to 2035	7,068	416
Residual requirement for five year period 2018 to 2023	2,080	
Residual requirement for five year period 2018 to 2023 plus 5% buffer	2,184	437

Table 3: Calculating the five year housing requirement based on LHN

Component	Net dwellings	Average net dwellings per annum
Housing requirement 2016 to 2026	4,413	441
Net additions to stock 2016 to 2018	588	294
Residual requirement 2018 to 2026	3,825	478
Residual requirement for five year period 2018 to 2023	2,390	
Residual requirement for five year period 2018 to 2023 plus 5% buffer	2,510	502

4.7. Table 2 shows that, against OAHN, at least 437dpa need to be delivered over the next five years. Table 3 shows that, against LHN, the five year requirement is higher at 502dpa.



## 5. Assessment of Five Year Housing Land Supply

5.1. Tables 4 & 5 compare MVDC's five year supply against its housing requirement, with Table 4 giving a comparison to OAHN and Table 5 a comparison to LHN.

Table 4: Comparing five year housing land supply and requirement based on OAHN

Component	Net dwellings
a) Deliverable supply	1,246
b) Residual requirement plus 5%	2,184
Supply above or below requirement (a – b)	-938

Table 5: Comparing five year housing land supply and requirement based on LHN

Component	Net dwellings
a) Deliverable supply	1,246
b) Residual requirement plus 5%	2,510
Supply above or below requirement (a – b)	-1,264

5.2. Tables 6 & 7 show the number of years worth of housing supply when assessed against the districts housing requirement, for OAHN and LHN respectively.

Table 6: Calculation of supply equivalent over five years based on OAHN

Component	Net dwellings
a) Deliverable supply	1,246
b) Residual requirement plus 5%	2,184
Years supply equivalent over 5 years ((a / b) x 5)	2.85 years

Table 7: Calculation of supply equivalent over five years based on LHN

Component	Net dwellings
a) Deliverable supply	1,246
b) Residual requirements plus 5%	2,510
Years supply equivalent over 5 years ((a / b) x 5)	2.48 years

5.1. These tables show there is a housing land supply deficit within the District. The LHN figure is worse than the OAHN, with housing land supply less than half of what is required by the draft revised NPPF.

5.2. Against the OAHN, the land supply position remains almost unchanged from the previous five year land supply statement (2017 to 2022), up from 2.82 years supply to 2.85 years supply. This is because 384 net dwellings were completed in 2017/18 which is only 7 dwellings below the 391dpa OAHN, and deliverable land supply has barely increased, from 1,228 net dwellings (for 2017 to 2022) to 1,246 net dwellings.

## 6. Conclusions

- 6.1. Based on the evidence set out above, MVDC is unable to demonstrate a five year supply of land for housing development, when assessed against OAHN and LHN. The assessment against OAHN indicates a deficit of 938 net dwellings which equates to a 2.85 years' supply of housing land. The assessment against LHN is worse, with a deficit of 1,264 net dwellings, equivalent to 2.48 years' supply.
- 6.2. The advice in the NPPF indicates that in such circumstances Local Plan policies for the supply of housing are not considered to be up to date. This is a material consideration in the determination of planning applications for housing development. However, the weight to be attached to the assessment of housing land supply should recognise these housing need figures have not been tested or moderated against relevant constraints.
- 6.3. MVDC is currently preparing a new Local Plan, which, when concluded, will establish a new housing target upon which a new five year housing requirement will then be based. That housing target will take into account the impact of constraints which indicate that development should be restricted<sup>4</sup>. In Mole Valley, these include extensive areas of Green Belt and Area of Outstanding Natural Beauty, European nature conservation sites, Sites of Special Scientific Interest, areas at risk of flooding and heritage assets, all of which will be taken into account when assessing the appropriate level of housing provision during the plan period.
- 6.4. The five year supply may be reviewed in winter 2018/19 to take account of the changes that will take place following the publication of the new NPPF and implementation of the Housing Delivery Test.

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<sup>4</sup> See NPPF Paragraph 14, footnote 9.

## Appendix 1 – Deliverability assessment of sites with planning permission comprising of five or more net dwellings

Planning Reference	Site Address	Residual Net Units	Permission Date	Development Status	Suitable	Available	Achievable	Deliverable	Reasoning
MO/2014/0818	5-11, 61-75, 26-40, Sole Farm Avenue and 1-3, 21-47, 46-60 Middlemead Road and Garage Block, Bookham, Surrey	25		Phase 1 complete. Phase 2 commenced. Phase 3 part-commenced	Yes	Yes	Yes	Yes	Though there has been a slight slippage to the delivery timetable, development is progressing.
MO/2016/0196	Photo-Me International, Main House and Gatehouse Building, Church Road, Bookham, Leatherhead, Surrey, KT23 3PG	16	24 March 2016 & 21 July 2017	Under Construction	Yes	Yes	Yes	Yes	Under Construction.
MO/2015/0401	River Lane Yard, River Lane, Fetcham, Leatherhead, Surrey, KT22 9RW	5	29 September 2015	Under construction. Site Part-Complete	Yes	Yes	Yes	Yes	Under construction and 20 net units already complete on site.

Planning Reference	Site Address	Residual Net Units	Permission Date	Development Status	Suitable	Available	Achievable	Deliverable	Reasoning
MO/2014/0322	Queen Elizabeth Foundation for Disabled People, Woodlands Road, Leatherhead, Surrey, KT22 0BN	64	25 March 2015	Development commenced.	Yes	Yes	Yes	Yes	Development commenced.
MO/2017/1262	Connect House, Kingston Road, Leatherhead, Surrey	29	29 September 2017	Unimplemented Prior Approval.	Yes	Yes	Yes	Yes	Not first prior approval. Previous approval 3 May 2016. Despite business still occupying building, multiple applications shows desire for development.
MO/2016/1940	Land adjacent to Prime House, Challenge Court, Leatherhead, Surrey	16	12 June 2017	Under construction	Yes	Yes	Yes	Yes	Under construction

Planning Reference	Site Address	Residual Net Units	Permission Date	Development Status	Suitable	Available	Achievable	Deliverable	Reasoning
MO/2013/1073	Land at Therfield School and Nos 82 and 84 Cleeve Road, Leatherhead KT22 7NE	88	28 March 2014	Under Construction	Yes	Yes	Yes	Yes	Under Construction.
MO/2017/1261	Trident House, Kingston Road, Leatherhead, Surrey, KT22 7LT	22	29 September 2017	Unimplemented Prior Approval.	Yes	Yes	Yes	Yes	Not first prior approval. Despite business still occupying building, multiple applications shows desire for development.
MO/2016/0659	Land to the rear of 272-294, High Street, Dorking, RH4 1QT	8	10 October 2016	Unimplemented. Planning application also granted in April 2018 for development adjacent to this site. Another planning application has also been submitted on that adjacent site.	Yes	Yes	Yes	Yes	Delivery of this development maybe dependent on the delivery of adjacent development. However, these applications for development on adjacent site show continual active developer interest. No evidence to suggest non-implementation.

Planning Reference	Site Address	Residual Net Units	Permission Date	Development Status	Suitable	Available	Achievable	Deliverable	Reasoning
MO/2015/0677 & MO/2016/0905	207-213, High Street, Dorking, Surrey, RH4 1RU	14	2 July 2015 & 7 June 2017	Under Construction	Yes	Yes	Yes	Yes	Under Construction.
MO/2015/1157	White Horse Hotel, High Street, Dorking, Surrey, RH4 1BE	9	4 May 2016	Under Construction.	Yes	Yes	Yes	Yes	Under Construction
MO/2017/0695	Vine Court, Chalkpit Lane, Dorking, Surrey	30	5 October 2017	Under Construction.	Yes	Yes	Yes	Yes	Under Construction
MO/2018/0152	Kuoni House and Deepdene Lodge, Deepdene Avenue, Dorking, Surrey, RH5 4AZ	104	16 March 2018	Unimplemented. Supersedes previous Prior Approval (MO/2016/0734). This Prior Approval submitted following refusal of full application for larger scheme.	Yes	Yes	Yes	Yes	Kuoni business has new premises in Dorking which they will shortly move to. Site owned by housing developer. Principle of development for housing accepted by MVDC. Even if this application not implemented, development of site is deliverable.

Planning Reference	Site Address	Residual Net Units	Permission Date	Development Status	Suitable	Available	Achievable	Deliverable	Reasoning
MO/2016/0650	Regent House, Station Approach, Dorking, Surrey, RH4 1TH	27	10 June 2016	Unimplemented	Yes	No	?	No	Existing building still occupied and current occupiers have decided not to vacate the building.
MO/2015/1692	Three Acres, Reigate Road, Hookwood, Horley, Surrey, RH6 0AP	5	5 February 2016	Unimplemented	Yes	Yes	Yes	Yes	No evidence to suggest non-implementation.
MO/2016/1061	Fortyfoot Hall, Fortyfoot Road, Leatherhead, Surrey, KT22 8RY	8	3 November 2016	Unimplemented	Yes	Yes	Yes	Yes	No evidence to suggest non-implementation.
MO/2016/1108	145-153, High Street, Dorking, Surrey, RH4 1AG	9	12 December 2016	Under Construction.	Yes	Yes	Yes	Yes	Under Construction.
MO/2016/1105	Trevellyan and Whitehaven, and rear of Craig, Eastwick Road, Great Bookham, KT23 4BJ	5	17 November 2016	Under Construction	Yes	Yes	Yes	Yes	Under Construction



Planning Reference	Site Address	Residual Net Units	Permission Date	Development Status	Suitable	Available	Achievable	Deliverable	Reasoning
MO/2016/0610	Institute Of Further Education, Dene Street, Dorking, Surrey, RH4 3EB	12	23 December 2016	Unimplemented	Yes	Yes	Yes	Yes	Building vacant. Correspondence with applicant & owner has shown progress taking place 'behind the scenes' and indicated implementation of planning permission.
MO/2015/1211	Danby Croft and R/o Little Shepherds, Leatherhead Road, Bookham, Leatherhead, Surrey, KT23 4RR	7	9 October 2015	Under construction.	Yes	Yes	Yes	Yes	Under construction.
MO/2016/0516	Land rear of Photo Me International, Bookham Industrial Estate, Church Road, Bookham, Leatherhead, Surrey, KT23 3EU	16	23 November 2016	Part under construction, Part complete.	Yes	Yes	Yes	Yes	Residual under construction and most of site complete already.

Planning Reference	Site Address	Residual Net Units	Permission Date	Development Status	Suitable	Available	Achievable	Deliverable	Reasoning
MO/2016/0001	Land at 9 Farm Close, Highacres and Dalmuir, Guildford Road, Fetcham, Leatherhead, Surrey	6	9 May 2016	Part under construction, part complete	Yes	Yes	Yes	Yes	Part under construction, part complete.
MO/2016/0594	Land at Farthings and between Randalls Road and Cleeve Road, Leatherhead, Surrey KT22 0AA	61	16 September 2016	Part under construction, part complete	Yes	Yes	Yes	Yes	Part under construction, part complete.
MO/2014/1220	46-48, Lincoln Road, Dorking, Surrey, RH4 1TD	9	19 January 2015	Under Construction.	Yes	Yes	Yes	Yes	Under Construction
MO/2017/0025, MO/2017/0026, MO/2017/0027 & MO/2017/0250	Stocks House, 9, North Street, Leatherhead, Surrey, KT22 7AX	20	15 March 2017 (x3) & 8 September 2017	Prior Approvals Commenced but detailed application MO/2017/0250 unimplemented.	Yes	Yes	Yes	Yes	Prior Approval's Commenced.

Planning Reference	Site Address	Residual Net Units	Permission Date	Development Status	Suitable	Available	Achievable	Deliverable	Reasoning
MO/2016/0340	Magistrates Court, London Road, Dorking, Surrey, RH4 1SX	21	24 March 2017	Under Construction	Yes	Yes	Yes	Yes	Under Construction
MO/2017/0035	4, Bridge Street, Leatherhead, Surrey, KT22 8BZ	6	7 April 2017	Unimplemented	Yes	Yes	Yes	Yes	Permission fairly recent. Have two more years to commence.
MO/2017/0467	1, Paper Mews, Dorking, Surrey, RH4 2TU	8	19 May 2017	Unimplemented Prior Approval.	Yes	Yes	Yes	Yes	Prior Approval fairly recent. Have two more years to commence.
MO/2017/0439	87-99, High Street, Dorking, Surrey, RH4 1AN	8	8 June 2017	Unimplemented	Yes	Yes	Yes	Yes	Permission fairly recent. Have two more years to commence.
MO/2017/0771	Alpha and Beta Bilton Centre, Springfield Drive, Business Park 5, Research Area, Leatherhead, Surrey, KT22 7NH	48	28 June 2017	Unimplemented Prior Approval	Yes	No	No	No	Still used as office and occupied. PN expires before lease therefore would require lease surrender to become deliverable.

Planning Reference	Site Address	Residual Net Units	Permission Date	Development Status	Suitable	Available	Achievable	Deliverable	Reasoning
MO/2017/0739	Thornetts House, Challenge Court, Barnett Wood Lane, Leatherhead, Surrey, KT22 7DE	15	4 July 2017	Unimplemented Prior Approval.	Yes	Yes	Yes	Yes	Prior Approval fairly recent. Have two more years to commence. No evidence to suggest non-implementation.
MO/2017/0862	Cleeve Court, Cleeve Road, Leatherhead, Surrey	45	6 July 2017	Unimplemented Prior Approval.	Yes	Yes	Yes	Yes	Prior Approval fairly recent. Have two more years to commence. No evidence to suggest non-implementation.
MO/2017/0827	British Food Manu Research Association, Randalls Way, Leatherhead, Surrey, KT22 7RY	43	13 July 2017	Unimplemented Prior Approval. Another Prior Approval for 83 flats refused. Application submitted for outline permission for 218 dwellings.	No	No	No	No	Precipitous in advance of comprehensive development scheme established for whole site

Planning Reference	Site Address	Residual Net Units	Permission Date	Development Status	Suitable	Available	Achievable	Deliverable	Reasoning
MO/2016/1645	Ridgelea and Briar Bank, Guildford Road, Fetcham, Surrey, KT22 9BW	5	20 July 2017	Unimplemented. Another recent approval after 31 March 2018 for 6 net dwellings.	Yes	Yes	Yes	Yes	Permission fairly recent. Have two more years to commence. No evidence to suggest non-implementation.
MO/2017/0394	Fairfield Works, Upper Fairfield Road, Leatherhead, Surrey, KT22 7HJ	10	4 August 2017	Unimplemented	Yes	Yes	Yes	Yes	Permission fairly recent. Have two more years to commence. No evidence to suggest non-implementation.
MO/2017/1518	Stokes House, Cleeve Road, Leatherhead KT22 7SB	73	18 October 2017	Unimplemented Prior Approval.	Yes	No	?	No	Building vacant. Area wide legal agreement preventing use other than for employment. Application seeking to remove legal agreement refused.

Planning Reference	Site Address	Residual Net Units	Permission Date	Development Status	Suitable	Available	Achievable	Deliverable	Reasoning
MO/2017/1548	Spring Court, Station Road, Dorking, Surrey, RH4 1EB	9	23 October 2017	Unimplemented Prior Approval. Another Prior Approval, after 31 March 2018, increasing number of dwellings to 14.	Yes	No	Yes	Yes	Prior Approval fairly recent. Have two and a half more years to commence. No evidence to suggest non-implementation.
MO/2017/1663	Hazeldean, Station Road, Leatherhead, Surrey, KT22 7AA	12	9 November 2017	Unimplemented Prior Approval. More recent Prior Approval granted for change of use into a registered nursery.	Yes	No	No	No	Further planning application submitted for advertising signing of building as a nursery, in association with latest Prior Approval. Site no longer considered available for housing development.
MO/2016/1691	Velgrad, Mill Hill Lane, Brockham, Surrey, RH3 7LS	5	2 November 2017	Under Construction	Yes	Yes	Yes	Yes	Under Construction

Planning Reference	Site Address	Residual Net Units	Permission Date	Development Status	Suitable	Available	Achievable	Deliverable	Reasoning
MO/2017/1768	Fountain House, Cleeve Road, Leatherhead, Surrey, KT22 7NH	31	1 December 2017	Unimplemented Prior Approval	Yes	Yes	Yes	Yes	No evidence to suggest non-implementation.
MO/2017/1382	Land rear of Grantham House, 11-15, North Street, Leatherhead, Surrey	6	7 December 2017	Unimplemented. Another planning application submitted for 9 net dwellings.	Yes	Yes	Yes	Yes	Permission fairly recent. Have two and a half more years to commence. No evidence to suggest non-implementation.
MO/2017/1220	The Pilgrim, Station Road, Dorking, Surrey, RH4 1HF	10	12 January 2018	Unimplemented	Yes	Yes	Yes	Yes	Building vacant. Permission is recent. No evidence to suggest non-implementation.
MO/2017/2293	The Chapel, Reigate Road, Leatherhead, Surrey, KT22 8RA	18	14 February 2018	Unimplemented Prior Approval. Further application submitted to facilitate conversion.	Yes	Yes	Yes	Yes	Application to facilitate conversion soon after prior approval decision date shows delivery in next five year is likely.

Planning Reference	Site Address	Residual Net Units	Permission Date	Development Status	Suitable	Available	Achievable	Deliverable	Reasoning
MO/2018/0159	First and Second Floors, St Martins Walk, Dorking, Surrey, RH4 1UX	18	29 March 2018	Unimplemented Prior Approval. On Brownfield Land Register.	Yes	Yes	Yes	Yes	Prior Approval is recent. No evidence to suggest non-implementation.



## Appendix 2 – Windfall Delivery

Reporting Year	Total net dwellings completed	Net dwellings completed on sites comprising 1 to 9 net dwellings (as proportion of total)	Net dwellings completed on sites comprising 1 to 9 net dwellings on garden land	Net dwellings completed on sites comprising 1 to 9 net dwellings on other non-previously developed land	Net dwellings completed on sites comprising 1 to 9 net dwellings on previously developed land
2006/07	584	121 (21%)	32	8	81
2007/08	272	124 (46%)	41	0	83
2008/09	169	78 (46%)	24	2	52
2009/10	117	89 (76%)	34	4	51
2010/11	118	90 (76%)	30	6	54
2011/12	236	107 (45%)	34	9	64
2012/13	182	108 (59%)	39	3	66
2013/14	129	102 (79%)	28	2	72
2014/15	193	121 (62%)	13	11	97
2015/16	164	124 (76%)	22	0	102
2016/17	204	137 (67%)	30	19	85
2017/18	384	150 (39%)	20	19	111
<b>2008 to 2018</b>	<b>1,896</b>	<b>1,106 (58%)</b>	<b>274</b>	<b>75</b>	<b>754</b>
<b>Ten year average</b>	<b>190</b>	<b>111</b>	<b>27</b>	<b>8</b>	<b>75</b>

## Appendix 3 – Summary of Completed Housing Developments

### Total Dwelling Completions since 1 April 2006

	1 April 2017 to 31 March 2018 Latest Reporting Year	1 April 2015 to 31 March 2018 Since start of SHMA base date	1 April 2006 to 31 March 2018 Since start of Core Strategy base date
Gross New Private Sector Dwellings Completed	390	831	2,591
Gross New Public Sector Dwellings Completed	40	84	642
Total Gross Dwellings Completed	430	915	3,233
Dwellings Lost as a result of Residential Development	46	163	481
Dwellings Lost to Other Development	0	6	36
Total Dwellings Lost	46	169	517
Net Additions to Dwelling Stock	384	746	2,716

## Annual Net Dwellings Completed and Net Additions to Dwelling Stock since 1 April 2006

Reporting Year	Total Net Dwellings Completed	Net Additions to Dwelling Stock
2006/07	584	581
2007/08	272	269
2008/09	169	167
2009/10	117	115
2010/11	118	113
2011/12	236	235
2012/13	182	173
2013/14	129	127
2014/15	193	190
2015/16	164	158
2016/17	204	204
2017/18	384	384