Strategic Housing Land Availability Assessment

Draft Methodology

Consultation period 14th March to 11th April 2011
Contents

1. Introduction ........................................................................................................ 1
   Purpose of the assessment .................................................................................. 2
   Requirements of the assessment........................................................................ 3

2. Methodology ...................................................................................................... 5
   Stage 1: Planning the Assessment .................................................................... 5
   Stage 2: Determining which sources of sites will be included in the assessment and desktop review of existing information ........................................ 5
   Stage 3: Determining which sites and areas will be surveyed ......................... 6
   Stage 4: Carrying out the survey ..................................................................... 7
   Stage 5: Estimating the housing potential of each site .................................. 8
   Stage 6: Assessing when and whether sites are likely to be Developed .......... 9
      Stage 6a: Assessing the Suitability for Housing ......................................... 9
      Stage 6b: Assessing the Availability for Housing ..................................... 13
      Stage 6c/d: Assessing Achievability and Overcoming constraints ......... 13
   Stage 7: Review of the assessment ................................................................. 15
   Stage 8: Determining the housing potential of windfall ............................... 15

3. Next Steps ........................................................................................................ 18

Appendices
   Appendix A - Map of SHLAA area ................................................................. 20
   Appendix B – List of settlements considered in the SHLAA ....................... 21
   Appendix C – SHLAA stakeholder list.......................................................... 22
   Appendix D - Standardised site assessment pro-forma ............................... 24
   Appendix E – Viability Assessment ............................................................... 28
1. Introduction

1.1. Planning Policy Statement 3 (PPS3): Housing (November 2006) sets out the Government’s national planning policy framework for housing. This states that the planning system should deliver “a flexible, responsive supply of land – managed in a way that makes efficient and effective use of land, including re-use of previously developed land, where appropriate”.

1.2. To assist in identifying a supply of housing land, PPS3 requires local authorities to produce two complementary documents: a Strategic Housing Land Availability Assessment (SHLAA) and a Strategic Housing Market Assessment (SHMA). The assessments provide information on the level of need and demand for housing and the opportunities that exist to meet it. Assessments should be prepared collaboratively with stakeholders. Where two or more Local Planning Authorities form a housing market area, those authorities should work together either by preparing joint assessments or by ensuring consistency in methodology.

1.3. Waveney District and Great Yarmouth Borough together form a housing market area. The Great Yarmouth and Waveney Strategic Housing Market Assessment was prepared jointly for both authorities and was published in September 2007. This report included:

- An analysis of the policy context for looking at local housing markets;
- A detailed overview of the housing situation in the sub-region within the demographic, social and economic context;
- Profiles of each of 13 localities in the study area;
- A detailed focus on specific housing issues such as the nature of affordable housing requirements, the housing needs of hostel dwellers, housing options for older people, accommodation needs of minority groups; and
- Details of how the assessment will be monitored and updated.

1.4. It has not been possible to carry out a joint Strategic Housing Land Availability Assessment for Waveney and Great Yarmouth due to differences in Local Development Framework timetables. Waveney published an initial SHLAA in November 2007, which updated the Council’s 2002 Urban Capacity Study and took on board much of the emerging guidance on SHLAA methodology. This was undertaken to inform the preparation of the Waveney Core Strategy, which was submitted in February 2008 and subsequently adopted in January 2009. Great Yarmouth Borough Council published the proposed methodology of their SHLAA for consultation in November 2008, and the final report was published recently, in June 2010. However, although not identical, this methodology has been drafted to be consistent with the approach taken in preparing the Great Yarmouth SHLAA.

1.5. Detailed guidance on producing Strategic Housing Land Availability Assessments was published by the Government in July 2007, entitled ‘Strategic Housing Land Availability Assessments Practice Guidance’. The guidance strongly recommends the use of the standard methodology set out
within it, and this methodology has therefore been drafted broadly in line with this advice.

Purpose of the assessment

1.6. This assessment updates the first Waveney SHLAA published in November 2007. The methodology has been updated to have regard to the Government’s SHLAA Practice Guidance (2007) which will ensure that data is collected and presented in a way that is consistent with SHLAAAs of neighbouring authorities.

1.7. The Strategic Housing Land Availability Assessments Practice Guidance (July 2007) defines the main purpose of a SHLAA as being to:
   - Identify sites with potential for housing;
   - Assess their housing potential; and
   - Assess when they are likely to be developed.

1.8. Annex C of PPS3 expands on this stating that the key purposes of a SHLAA are to:
   - Assess the likely level of housing that could be provided if unimplemented planning permissions were brought into development;
   - Assess land availability by identifying buildings or areas of land (including previously-developed land and greenfield) that have development potential for housing, including within mixed-use developments;
   - Assess the potential level of housing that can be provided on identified land;
   - Where appropriate, evaluate past trends in windfall land coming forward for development and estimate the likely future implementation rate;
   - Identify constraints that might make a particular site unsuitable/ unviable/ unavailable for development; and
   - Identify what action could be taken to overcome constraints on particular sites.

1.9. SHLAA’s are different from Urban Capacity Studies (previously required by PPG3), and entail additional work including:
   - Determining whether sites within previous assessments are still available and reviewing assumptions on their housing potential;
   - Surveying within settlements to identify additional brownfield sites that have come forward since the last Urban Capacity Study;
   - Identifying additional sites with potential for housing which were not covered by Urban Capacity Studies, such as sites in rural settlements, brownfield sites outside settlement boundaries and suitable greenfield sites, as well as broad locations (where necessary); and
   - Assessing the deliverability/developability of all sites.

1.10. Waveney has an advanced Local Development Framework with nearly a whole suite of Development Plan Documents adopted. The Core Strategy was adopted in January 2009 and Site Specific Allocations and Development Management Policies adopted in January 2011. An Area Action Plan for the Lake Lothing and Outer Harbour area of Lowestoft was submitted to the Secretary of State in February 2011. The documents together, identify and allocate enough land for housing to meet the District’s needs up to and
slightly beyond 2025 (the plan period). This means that this SHLAA has a slightly different objective to many other SHLAA’s prepared which are generally used to inform plan making. This SHLAA will mainly be used to help monitor plan performance and delivery and help the Council understand the likely level of housing that is additional to that which is identified in the above Development Plan Documents. This information is valuable for the purposes of infrastructure planning and understanding likely future receipts from a Community Infrastructure Levy which the Council is intending to introduce. The data collected for the purposes of a SHLAA and updated annually will also help inform any future review of development plan documents. The SHLAA will also help inform the preparation of the annual “Assessment of a 5-year Supply of Housing Land”.

1.11. As the Council already has an adopted Core Strategy and Development Management Policies and the fact that this SHLAA is not for plan review purposes, to have potential for housing, sites would need to comply with Core Strategy policies, in particular policies CS01 - Spatial Strategy, CS11 – Housing and DM01 – Physical Limits. Therefore the focus of this SHLAA will be sites within the physical limits of the 5 main towns of Waveney and the larger villages identified in Core Strategy Policy CS01.

Requirements of the assessment

1.13. The key outputs and process requirements of a SHLAA are set out in the Practice Guidance as follows:

Table 1: SHLAA core outputs

<table>
<thead>
<tr>
<th></th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>A list of sites, cross referenced to maps showing locations and boundaries of specific sites (and broad locations where necessary)</td>
</tr>
<tr>
<td>2</td>
<td>Assessment of the deliverability/developability of each identified site (i.e. in terms of its suitability, availability and achievability) to determine when an identified site is realistically expected to be developed</td>
</tr>
<tr>
<td>3</td>
<td>Potential quantity of housing that could be delivered on each identified site or within each identified broad location (where necessary) or on windfall sites (where justified)</td>
</tr>
<tr>
<td>4</td>
<td>Constraints on the delivery of identified sites</td>
</tr>
<tr>
<td>5</td>
<td>Recommendations on how these constraints could be overcome and when</td>
</tr>
</tbody>
</table>

Table 2: SHLAA process checklist

<table>
<thead>
<tr>
<th></th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>The survey and assessment will involve key stakeholders including house builders; social landlords; local property agents and local communities. Other relevant agencies may include the Homes and Communities Agency (a requirement where they are particularly active)</td>
</tr>
<tr>
<td>2</td>
<td>The methods, assumptions, judgements and findings will be discussed and agreed upon throughout the process in an open and transparent way, and explained in the Assessment report. The report will include an explanation as to why particular sites or areas have been excluded from the Assessment</td>
</tr>
</tbody>
</table>
2. Methodology

2.1 The method followed in assessing sites with housing potential will follow the approach outlined in the SHLAA Practice Guidance. The methodology below closely follows the methodology employed by Great Yarmouth Borough Council who are within the same housing sub-region as Waveney. The Great Yarmouth methodology was developed by a Working Party consisting of developers, property agents, and Government advisory bodies such as the Environment Agency and Natural England. Given the slightly different purpose of this SHLAA and the different stage of the plan making process, in some cases this methodology will differ from Great Yarmouth’s.

Stage 1: Planning the Assessment

2.2 Officers from the Planning Policy team at Waveney District Council will undertake the assessment work. The boundary of the assessment area is illustrated in Map 1 (Appendix A).

2.3 The Council will consult the following bodies on the methodology and assessment of sites during preparation of the SHLAA

- Developers operating within Waveney (through the Developers Forum)
- Registered Social Landlords operating within Waveney
- Suffolk County Council
- Neighbouring Local Authorities
- Home Builders Federation
- Homes and Communities Agency

Stage 2: Determining which sources of sites will be included in the assessment and desktop review of existing information

2.4 The SHLAA Practice Guidance identifies different sources of sites with potential for housing. Table 3 below identifies potential sources of housing sites for the Waveney SHLAA and describes the methods which will be used to collect the data. These sources should cover all of the likely supply of new housing over the period to 2025 given the advanced stage of the Waveney Local Development Framework.

<table>
<thead>
<tr>
<th>Table 3: Sources of sites with potential for housing</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Type of Site and Source</strong></td>
</tr>
<tr>
<td>A. Sites within the planning process</td>
</tr>
<tr>
<td>Allocations in the Site Specific Allocations Development Plan Document</td>
</tr>
</tbody>
</table>
The Lake Lothing and Outer Harbour Area Action Plan was submitted to the Secretary of State in February 2011 and identifies and allocates land for 1,585 homes. All sites allocated for housing in this document will be included in this SHLAA.

Sites with planning permission for housing that have not been implemented or are under construction
Sites with the benefit of planning permission for housing will be included in this assessment. A survey will be sent to applicants to help ascertain their timescales for development.

B. Sites not currently in the planning process

Previously-developed, vacant and derelict land and buildings
Previously-developed land comprises those sites that have been used for other purposes and that have now become available for redevelopment. The 2007 SHLAA will be updated by site visits and desktop surveys. Talks with Development Management Officers will also help ascertain whether there are any available sites from informal enquiries and refused planning permissions.

Surplus public sector land
Surplus public sector land will be identified through the Homes and Communities Agency register of surplus public sector land, at http://www.homesandcommunities.co.uk/Surplus_public_sector_land and local authority registers of land in their ownership.

Land in non-residential use which may be suitable for redevelopment as housing
Potential sites could include under-used car parks, vacant school buildings or the conversion or replacement of commercial buildings or mixed-use schemes.

Stage 3: Determining which sites and areas will be surveyed

Policy Exclusions

2.5. The SHLAA Practice Guidance states that some types of land or areas may be excluded from the assessment but justification for doing so should be provided. The guidance goes on to clarify that the scope of the assessment should not be narrowed down by existing policies to constrain development. However, this guidance is set against a context of preparing a SHLAA to inform plan making. As stated previously Waveney already has an adopted Core Strategy, Development Management Policies and Site Specific Allocations. These documents do not currently need to be reviewed and therefore the policies within them clearly need to be taken into account when determining the scope of a SHLAA. There is little value in including sources of sites such as greenfield sites outside of the physical limits if they would have no chance of securing planning permission because they are contrary to a planning framework that is likely to be in place for the whole plan period. Therefore, for sites to realistically be considered to have housing potential they must comply with local planning policies in the above mentioned development plan documents. Waveney Core Strategy policies CS01 - Spatial Strategy and CS11 – Housing identify the settlements that are considered appropriate for further housing growth within the District. Policy DM01 of the Development Management Policies seeks to constrain development within the physical limits of these settlements. Therefore, with the exception of those sites allocated within the Site Specific Allocations DPD and those sites already with the benefit of planning permission, sites that are
not within the physical limits of towns or larger villages will not be included in this assessment. Additionally sites within existing employment areas that are protected by Policy DM08 of the Development Management Policies will also not be included in this assessment.

2.6. It is also considered appropriate to exclude other sites, if conflict with national planning policies means that they have no realistic potential of being developed for housing. For this reason, sites that fall within Flood Zone 3b or within the curtilage of a nationally or internationally designated nature conservation site will also be automatically excluded from the assessment. This is summarised in Table 4 below.

<table>
<thead>
<tr>
<th>Type of site</th>
<th>Reason for exclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sites not within the physical limits of a towns or larger villages unless allocated in the Site Specific Allocations DPD or have planning permission.</td>
<td>Not considered to be a suitable location for housing delivery on this scale.</td>
</tr>
<tr>
<td>Land within Flood Zone 3b</td>
<td>Unacceptably high flood risk</td>
</tr>
<tr>
<td>Land within the curtilage of an SPA, SAC or Ramsar site</td>
<td>International nature conservation designation.</td>
</tr>
<tr>
<td>Land within the curtilage of a SSSI or NNR</td>
<td>National nature conservation designation.</td>
</tr>
<tr>
<td>Land within the curtilage of a Scheduled Ancient Monument or Historic Park or Garden</td>
<td>National heritage designation.</td>
</tr>
</tbody>
</table>

**Site Size Threshold**

2.7. A minimum size threshold will be applied when selecting sites for inclusion in the Assessment. Sites below 0.33 hectares in size (equivalent to 10 dwellings at a density of 30 dwellings per hectare) will not be included in this assessment. This threshold does not apply to those sites that are allocated within the Site Specific Allocations and the Lake Lothing and Outer Harbour Area Action Plan and those sites with planning permission. This approach will ensure that the SHLAA only considers sites of strategic importance. Additionally it is likely to be difficult to assess the suitability, achievability and availability of sites smaller than 0.33 hectares. The contribution from these smaller sites will be analysed in Stage 8 which looks at the windfall potential of the District.

**Stage 4: Carrying out the survey**

2.8. With the exception of existing planning permissions and sites allocated in the Site Specific Allocations DPD and the emerging Lake Lothing and Outer Harbour Area Action Plan DPD, all sites identified by the desktop review will be visited. Sites with planning permission and allocated sites have already been visited in determining the planning application and preparing the development plan documents. Site visits for unallocated sites will help to resolve any inconsistencies in information and identify any constraints to development. The site survey may also identify additional sites with housing potential that were not identified through the desktop review.
2.9. The survey will be conducted by the Council's Planning Policy Team, using a standardised pro-forma (see Appendix D).

2.10. While on site the following characteristics will be recorded and/or checked:
- Site size
- Site boundaries
- Current uses
- Surrounding land uses
- Character of surrounding area
- Physical constraints (e.g. access, topography, flood risk, natural features of significance and location of pylons)
- An initial assessment of whether the site is suitable for housing either exclusively or as part of a mixed-use development.

Stage 5: Estimating the housing potential of each site

2.11. The methodology will use a multiplier approach to assess the housing potential of each of the sites identified in the assessment. For sites with planning permission, the number of homes granted with the planning permission will be used to ascertain the housing potential of the site. For sites already allocated in Site Specific Allocations DPD, the number of homes the site is allocated for will be used to ascertain the housing potential of the site. All other sites will be use a multiplier approach. As those site proposed to be allocated in the Lake Lothing Outer Harbour Area Action Plan have not yet been tested through independent examination, it is thought to be necessary to subject these sites to the multiplier approach too.

2.12. The housing potential and yield for each site will be guided by existing or emerging planning policy. Policy DM16 of the Adopted Development Management Policies DPD states that the Council will seek to achieve a minimum density of 30 dwellings per hectare where appropriate. Higher densities of at least 50 dwellings per hectare will be sought in the most accessible locations, such as the central areas of Lowestoft and the market towns. Policy HC1 of the emerging Lake Lothing and Outer Harbour Area Action Plan requires a range of densities of between 50 and 90 dwellings per hectare. The standard densities shown in Table 5 will be used for the purposes of this SHLAA, unless assessment of an individual site suggests a more appropriate density for that site.

<table>
<thead>
<tr>
<th>Site location</th>
<th>Density multiplier</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site is located within a town centre or within the Area Action Plan area</td>
<td>50</td>
</tr>
<tr>
<td>Site is located elsewhere</td>
<td>30</td>
</tr>
</tbody>
</table>

2.13. Some sites are awkward in shape and may affect their layout and the amount of housing that could realistically be provided. To ascertain the net developable area of sites, the following multiplier should be applied:
Table 6: Irregular site multiplier

<table>
<thead>
<tr>
<th>Site description</th>
<th>Shape multiplier</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site is regular in shape</td>
<td>1</td>
</tr>
<tr>
<td>Site is irregular in shape which compromises development potential</td>
<td>0.75</td>
</tr>
</tbody>
</table>

2.14. For some sites, particularly those with constraints it may be necessary to further examine the realistic capacity for housing by discounting the level of housing by excluding the area taken up by the constraint or through looking at potential design based solutions.

Stage 6: Assessing when and whether sites are likely to be Developed

2.15. This stage of the assessment examines whether a proposed or identified site is suitable, available and achievable. In accordance with PPS3 sites will be considered as to whether they are:

**Deliverable** – if a site is available now, offers a suitable location for housing development now and there is a reasonable prospect that housing will be delivered on the site within five years from the adoption of the plan; and

**Developable** – if the site is in a suitable location for housing development and there is a reasonable prospect that the site will be available and could be developed at a specific point in time.

2.16 Where it is unknown when a site could be developed then it will be regarded as not currently developable. This may be, for example, because one of the constraints to development is severe, and it is not known when it might be overcome.

Stage 6a: Assessing the Suitability for Housing

2.17 The SHLAA Practice Guidance states that a site is suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities.

2.18 Sites that are allocated in the Adopted Site Specific Allocations document have been subjected to sustainability appraisal and tested through independent examination, so therefore can be regarded as ‘suitable’ for the purposes of this exercise. Sites with planning permission can also be regarded as suitable, as their suitability would have been assessed through the determination of a planning application.

2.19 For all other sites within this assessment an appraisal of suitability is necessary. A site could be considered suitable if it is free from constraints or has constraints that can be overcome. Table 7 identifies a number of different constraints and are categorised as follows.
Restrictions: criteria that are based upon restrictions to development that are outlined in national or local planning policy. These include issues such as flood risk, coastal erosion, and contamination. Some of these constraints will be surmountable although a cost will be involve which could affect the achievability of development. Some restrictions will act as a fundamental, insurmountable constrain to development.

Potential impacts: criteria that are based upon the effects a site may have on social, economic or environmental issues. This criteria includes assessment of impact upon nature designations, heritage, transport and local service provision. Some impacts will be unacceptable and act as a fundamental constraint to development. Acceptableness of an impact is generally defined by national and local planning policy.

Physical qualities of the site: criteria that are based upon what is on, or not on a site, or may require investment to overcome. Criteria includes, the infrastructure capacity of site, its ability to be accessed and its proximity to local services.

2.20 Some sites will have constraints that are insurmountable and thus undermine the suitability of development. Other sites will have constraints, that are surmountable, however, they may be costly to overcome and have an impact on the achievability of development. The framework in Table 7, over the page, provides a method of assessing whether the constraints on a site with respect to various suitability criteria undermine its suitability. Looking at Table 7, any site fulfilling a “Column A” constraint against any criteria will immediately be discounted from the assessment as the site will not be suitable for development. Sites exhibiting “Column B” constraints will be considered suitable providing the constraints can be viably overcome. Therefore sites fulfilling any “Column B” constraint will be tested for their availability and achievability.
Table 7: Suitability Assessment Framework

<table>
<thead>
<tr>
<th>Suitability Assessment framework Criteria</th>
<th>Column A</th>
<th>Column B</th>
<th>Column C</th>
</tr>
</thead>
<tbody>
<tr>
<td>The site is constrained to a degree to not be overcome</td>
<td>The constraint is relevant to the site and may bring into question the suitability, availability or achievability of the site</td>
<td>The site is unconstrained, and/or, the suitability, availability or achievability of the site is favourably enhanced</td>
<td></td>
</tr>
</tbody>
</table>

**Restrictions**

<table>
<thead>
<tr>
<th>Restrictions</th>
<th>Column A</th>
<th>Column B</th>
<th>Column C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flood Risk</td>
<td>Flood Risk Zone 2+3a unless in Lake Lothing and Outer Harbour Area Action Plan area</td>
<td>Flood Risk 2+3a if within Lake Lothing and Outer Harbour Area Action Plan area</td>
<td>Flood Zone 1</td>
</tr>
<tr>
<td>Contamination</td>
<td>n/a</td>
<td>Potentially contaminated</td>
<td>No known contamination</td>
</tr>
<tr>
<td>Hazardous Area</td>
<td>n/a</td>
<td>Site is within 250m of hazardous installation</td>
<td>The site is outside of 250m of any hazardous installation.</td>
</tr>
<tr>
<td>Coastal Erosion</td>
<td>Within Coastal Change Management Area</td>
<td>Within 30m of Coastal Change Management Area</td>
<td>Not within 30m of Coastal Change Management Area</td>
</tr>
<tr>
<td>Minerals sites</td>
<td>Development would result in sterilisation of a identified mineral deposit in the Minerals LDF</td>
<td>n/a</td>
<td>No impact on known minerals sites</td>
</tr>
</tbody>
</table>

**Potential Impacts**

<table>
<thead>
<tr>
<th>Potential Impacts</th>
<th>Column A</th>
<th>Column B</th>
<th>Column C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Visual Landscape</td>
<td>n/a</td>
<td>Adjacent to Area of Outstanding Natural Beauty, Heritage Coast or Broads or otherwise likely have an impact on these designations.</td>
<td>No impact on any landscape designation or wider landscape.</td>
</tr>
<tr>
<td>Nature Conservation Designations</td>
<td>n/a</td>
<td>Likely impact on a County Wildlife Site, Local Nature Reserve, Roadside Nature Reserve, and regionally important geological sites.</td>
<td>No likely impact on a County Wildlife Site, Local Nature Reserve, Roadside Nature Reserve, and regionally important geological sites.</td>
</tr>
<tr>
<td>Heritage</td>
<td>Detrimental to setting of Scheduled Ancient Monument,</td>
<td>Within Conservation Area or adjacent or near to Listed</td>
<td>No Conservation Area or built environment designations.</td>
</tr>
</tbody>
</table>

11
<table>
<thead>
<tr>
<th>Suitability Assessment framework Criteria</th>
<th>Column A</th>
<th>Column B</th>
<th>Column C</th>
</tr>
</thead>
<tbody>
<tr>
<td>The site is constrained to a degree to not be overcome</td>
<td>Grade I &amp; II* built environment designations</td>
<td>Buildings and Locally Listed buildings</td>
<td>The constraint is relevant to the site and may bring into question the suitability, availability or achievability of the site</td>
</tr>
<tr>
<td>Impact on aquifers</td>
<td>n/a</td>
<td>At least part of site within a groundwater Source Protection Zone</td>
<td>No part of site within a groundwater Source Protection Zone</td>
</tr>
<tr>
<td>Local service provision</td>
<td>Results in loss of viable local services such as shops, public houses or community facilities</td>
<td>n/a</td>
<td>Does not involve the loss of viable local services such as shops, public houses or community facilities</td>
</tr>
<tr>
<td>Open Space</td>
<td>Development is on open space as protected by Policy DM25 and therefore replacement is needed.</td>
<td>Development does not result in the loss of open space</td>
<td></td>
</tr>
<tr>
<td>Transport Impacts</td>
<td>Unacceptable impact on functioning of trunk roads and local roads that cannot be mitigated</td>
<td>Impact on functioning of trunk roads and local roads that can possibly be mitigated</td>
<td>No detrimental impact on functioning of local roads and trunk roads.</td>
</tr>
<tr>
<td>Physical Qualities of the site</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Access to Site</td>
<td>No suitable on-site access with no scope for improvements</td>
<td>Access improvements required</td>
<td>No access issues</td>
</tr>
<tr>
<td>Access to Facilities</td>
<td>n/a</td>
<td>Access to none/one facility</td>
<td>Access to two or more facilities</td>
</tr>
<tr>
<td>Proximity to noise and other pollutants</td>
<td>Likely impact from noise and other pollutants</td>
<td>No likely impact from noise and other pollutants</td>
<td></td>
</tr>
<tr>
<td>Infrastructure capacity (sewage capacity, water supply capacity, electricity capacity)</td>
<td>n/a</td>
<td>No Available capacity/infrastructure needed</td>
<td>Available capacity</td>
</tr>
</tbody>
</table>
Stage 6b: Assessing the Availability for Housing

2.21 The SHLAA Practice guidance states that a site can be considered available if it is controlled by a housing developer or a landowner who has expressed an intention to develop. Sites allocated within the Adopted Site Specific Allocations document have recently been assessed for their deliverability through independent examination and therefore can be considered available and achievable for the purposes of this assessment. Sites with planning permission will also be considered as available by virtue of the fact that as planning permission has been applied for an intention to develop has been expressed.

2.22 For all other sites the availability will be tested. For the purposes of this SHLAA a site will be considered available if the a landowner or a developer has expressed an interest to develop. Therefore a site will be considered available if:

- The site has been promoted by a landowner of developer for residential development through the preparation of a development plan document such as the Site Specific Allocations DPD or Lake Lothing and Outer Harbour Area Action Plan DPD.
- If planning permission for residential development has been refused on the site in the last 24 months.
- If an informal enquiry about the potential for development on a site has been made to the Development Management team or the Planning Policy team within the last 24 months.
- If the site is submitted by a landowner or developer during consultation on this SHLAA for assessment in this SHLAA.

Stage 6c/d: Assessing Achievability and Overcoming constraints

2.23 Once sites have been appraised on their potential suitability and availability for development, consideration will need to be given to addressing identified constraints which could be impeding development and make calculated judgements as to whether or not these constraints are likely to be overcome.

2.24 This determination of whether a site is ‘achievable’ is illustrated in the SHLAA Practice Guidance as essentially a judgement about the economic viability of a site and the capacity of a developer to complete and sell the housing over a certain time period.

Viability

2.25 A site will not be delivered unless it is financially viable for a developer to develop the site or financially viable for a landowner to release a site for development. Therefore the financial viability of sites needs to be assessed in order to determine achievability.

2.26 In preparing the Site Specific Allocations DPD, all sites considered for allocation were tested for their viability. The Sites Financial Viability Assessment (February 2010) and the Sites Financial Viability Background
Paper (June 2010) together demonstrate that sites allocated in the Site Specific Allocations DPD are likely to be viable. The robustness of this evidence and the conclusions presented were tested through independent examination in October 2010. As the Site Specific Allocations DPD was found sound and adopted in January 2011 all sites allocated for housing in this document can be considered viable for the purposes of this assessment. Sites with planning permission will also be considered viable for the purposes of this assessment. It is considered too onerous to appraise the viability of every planning permission and it is likely that in the majority of cases the fact planning application has been submitted would indicate that the applicant believes the site is viable.

2.27 In the preparation of the Development Management Policies, a viability assessment of a range of notional sites was undertaken to inform the development of an affordable housing policy. The Affordable Housing Viability Study indicates that unconstrained sites throughout the District are viable for development with the levels of affordable housing prescribed in Policy DM18. Therefore those sites that do not have any identified constraints in “Column B” of Table 7 will be considered viable for the purposes of this SHLAA. Where sites do have constraints in “Column B” of Table 7, these constraints will need to be overcome in order for the site to be considered suitable. Overcoming these constraints could potentially have a cost implication. Where a cost implication is involved the site will be appraised for its viability. Details of the viability assessments are found in Appendix E

**Timescale for delivery**

2.28 Once the Assessment has considered that a site is suitable, available and achievable, it will need to consider when the site is likely to be brought forward for delivery.

2.29 The delivery of a site is dependant upon a number of different factors including the site’s viability, resolving identified constraints, additional infrastructure requirements, the overall complexity of the site and necessary lead in time for a planning application.

2.30 The Assessment will assess all delivery factors applicable to the site and make a judgement as to whether cumulatively the factors are likely to impede development. The Assessment will then indicate when the sites are likely to be deliverable, either within the first five years of the plan, or developable within 5-10 years, and 11-15 years or beyond.

2.31 For sites allocated in the Site Specific Allocations DPD, an assessment has already recently been conducted as to the likely delivery timescales of the site, so for the purposes of this SHLAA the timescale for delivery as identified within the Site Specific Allocations DPD will be used. For future years it may be necessary to review these projections. For sites with the benefit of planning permission, a survey will be sent out to the applicants to ascertain their timescales for developing out the site.
Stage 7: Review of the assessment

2.32. Once the initial survey of sites and the assessment of the deliverability / developability has been undertaken, the information will be used to produce an indicative housing trajectory, setting out how much housing can be provided, and when. A risk assessment will be made to consider whether sites will come forward as anticipated.

Stage 8: Determining the housing potential of windfall

2.33. A windfall site is one, which has not been specifically identified as available in the local plan process. The term covers previously-developed sites that have unexpectedly become available, ranging from large sites (e.g. resulting from a factory closure) to small sites such as a residential conversion or a new flat over a shop.

2.34. PPS3 sets a clear expectation that the supply of land for housing should be based upon specific sites, and where necessary, broad locations. However, it recognises that there may be genuine local circumstances where a windfall allowance is justified. The disadvantage of relying on a windfall allowance is that it is not clear exactly where development is likely to occur, there is little certainty for communities or developers and estimates make it more difficult to plan for example, making sure the necessary infrastructure is in place.

2.35. The Waveney Core Strategy includes a justified windfall potential of 250 dwellings from 2017 onwards in the market towns. This windfall potential was based on information coming out of the 2007 Strategic Housing Land Availability Assessment. The 2007 SHLAA, showed that a large proportion of brownfield sites within market towns were small sites and were not suitable for allocation. Therefore, a windfall allowance was justified which reduced the need to allocate land on greenfield sites to meet housing targets. Since the adoption of the Core Strategy, 216 new dwellings have been permitted on windfall sites in the market towns (as of April 2010) which shows that windfall continues to be a large source of housing supply. These permissions have not been subtracted from the Post 2017 Core Strategy allowance.

2.36. Given the Core Strategy’s post 2017 windfall allowance it is important for this SHLAA to provide an update of the windfall potential of District. It is important to understand whether post 2017 there is still likely to be an additional 250 homes on windfall sites within the market towns. There may also be potential for additional windfall development in Lowestoft which should also be tested. Testing the windfall potential of the District is also valuable for infrastructure planning purposes, as there is likely to be more development than is planned for in the Core Strategy and what is identified through the earlier stages of this SHLAA which will have an impact on infrastructure capacity.

2.37. To estimate the potential of windfall sites an assessment will be carried out similar to that for the 2007 SHLAA and previous Urban Capacity Sites. This is broadly in line with the SHLAA practice guidance which advises that one way of determining a realistic windfall allowance is to estimate the housing
potential from each likely source of housing whilst avoiding double counting sites already assessed through the SHLAA. To ensure there is no double counting, this part of the SHLAA will only assess the windfall potential of sites that are smaller than the threshold set for the earlier stages of this SHLAA of 0.33 hectares.

2.38. Table 8 below outlines the different sources of housing supply that will be tested in informing the windfall potential. Table 8 also briefly outlines the methodology which will be applied to assess the yield of housing from each source of supply.

Table 8. Windfall Sources

<table>
<thead>
<tr>
<th>Source of Supply</th>
<th>Methodology</th>
</tr>
</thead>
<tbody>
<tr>
<td>Subdivision of existing housing</td>
<td>As per the 2007 SHLAA methodology this source of supply will be assessed based on past trends of subdivision of existing units and the merging of two or more units over the past five years.</td>
</tr>
<tr>
<td>Flats over shops</td>
<td>The 2002 Urban Capacity Study identified all shops and offices (excluding warehouses and corner shops) in Lowestoft and the Market towns with non-residential uses on upper floors to work out the potential of this source. This was complemented by a survey of 1 in 3 owners/occupiers to ascertain the likelihood of accommodation becoming available. The 2007 SHLAA updated this work based on past trends. This SHLAA will further update this work using past trends.</td>
</tr>
<tr>
<td>Previously developed and derelict land</td>
<td>This source includes all previously developed land and derelict land that was in or is in uses other than residential. Sites smaller than 0.33 hectares identified in the 2007 SHLAA will be reassessed. The capacity of each site will calculated using the methodology described in Stage 5 of this SHLAA. It is likely that a number of the sites identified will not be developed, therefore the theoretical capacity will be discounted using a rate informed by an analysis of past trends on the take up of urban capacity sites.</td>
</tr>
<tr>
<td>Intensification</td>
<td>This source includes the intensification of residential land such as gardens, garage courts and the redevelopment of one or two dwellings. Sites smaller than 0.33 hectares identified in the 2007 SHLAA will be reassessed. The capacity of each site will calculated using the methodology described in Stage 5 of this SHLAA. It is likely that a number of the sites identified will not be developed, therefore the theoretical capacity will be discounted using a rate informed by an analysis of past trends on the take up of urban capacity sites.</td>
</tr>
<tr>
<td>Vacant Land not previously developed</td>
<td>Vacant land includes land that has not been previously developed within settlements. It excludes agricultural land, playing fields and other designated open space. Sites smaller than 0.33 hectares identified in the 2007 SHLAA will be reassessed. The capacity of each site will calculated using the methodology described in Stage 5 of this SHLAA. It is likely that a number of the sites identified will not be developed, therefore the theoretical capacity will be discounted using a rate informed by an analysis of past trends on the take up of urban capacity sites.</td>
</tr>
</tbody>
</table>
| Redevelopment                            | This source includes all stand-alone temporary and permanent...
of car parks

| car parks. Sites smaller than 0.33 hectares identified in the 2007 SHLAA will be reassessed. The capacity of each site will calculated using the methodology described in Stage 5 of this SHLAA. It is likely that a number of the sites identified will not be developed, therefore the theoretical capacity will be discounted using a rate informed by an analysis of past trends on the take up of urban capacity sites. |

2.39. For all sources of sites identified above, consideration will be given to the timing of delivery within the plan period. This will be worked out by judgement based upon the level of constraints on a particular site and regard to past trends. In accordance with Planning Policy Statement 3 windfall sources will not be considered to contribute to the five year supply statement.

2.40. In contrast to the sites tested in the main part of this SHLAA, sites tested in this part of the SHLAA will not be individually identified. This is due to the small and sensitive nature of the sites tested in this part of the SHLAA.
3. **Next Steps**

3.1. Consultation on this draft methodology will take place from 14\textsuperscript{th} March 2011 until 11\textsuperscript{th} April 2011. Comments received as part of this consultation will be taken on board in determining the final methodology.

3.2. If you would like more information on the SHLAA or would like to be involved in further consultation please contact:

Samuel Hubbard  
Planning Policy Officer  
Waveney District Council, Town Hall, High Street, Lowestoft  
NR32 1HS  
Tel: 01502 523043  
E-mail: sam.hubbard@waveney.gov.uk

Julie Hood  
Senior Planning Policy Officer  
Waveney District Council, Town Hall, High Street, Lowestoft  
NR32 1HS  
Tel: 01502 523082  
E-mail: Julie.hood@waveney.gov.uk
Appendix A - Map of SHLAA area
Appendix B – List of settlements considered in the SHLAA

Lowestoft (including Carlton Colville and Oulton)
Beccles
Worlingham
Bungay
Halesworth
Southwold
Reydon
Barnby
North Cove
Blundeston
Corton
Holton
Kessingland
Wangford
Wrentham
Appendix C – SHLAA stakeholder list

SHLAA Stakeholders Consultation List

Registered Social Landlords
Orwell Housing Association
Orbit Housing Association
Flagship Housing
Circle Anglia
Broadland Housing Association
Cotman Housing
Saffron Housing

Planning agents, developers, builders and architects
AAK Design Associates Ltd
Architectural Design and Planning
Arnolds Chartered Surveyors
ASD Architecture
Badger Building East Anglia Ltd.
Bailey Dev Ltd
Barry Cutts
Barsham Securities Ltd.
Brian Howard Charted Architect
Brian Sabberton Ltd.
Chaplin Farrant ltd
Chediston Homes Ltd.
Cripps Developments Ltd.
Duncan and Son Ltd
Gilbert Builders
Hopkins Homes Ltd.
Howard Group New Homes Land Division
John Bennet Architect
K Holdings Ltd (Anglia)
Kingsway Builders
M.S. Oakes Ltd.
MDPC Ltd
Oakwood Construction
Oldman Homes Ltd
OWL Partnership
P J Spillings
Persimmon Homes (Anglia) Ltd.
Pure Architecture Ltd.
Purple Property
Riddle Construction Ltd
Sprake and Tyrrell Ltd
Taylor Properties Trading Ltd
Tredwell Developments
Utting Construstion
Vaughan Keal Associates
Warnes and Son Ltd
Wellington Construction Ltd
John Kelly
Paul Tungate MRICS

Planning Authorities
Broads Authority
Great Yarmouth Borough Council
Mid Suffolk District Council
South Norfolk District Council
Suffolk Coastal District Council
Suffolk County Council
Norfolk County Council

Other Stakeholders
1st East Waterfront Regeneration Company
Associated British Ports
Anglian Water
Environment Agency
English Heritage
Essex and Suffolk Water
GO-East
Great Yarmouth & Waveney PCT
Home Builders Federation
Homes and Community Agency
Lowestoft & Waveney Chamber of Commerce
Lowestoft Civic Society
Lowestoft College
Kirkley Business Association
Natural England
Suffolk Association of Voluntary Organisations
Southwold and Reydon Society
Suffolk ACRE
Suffolk Preservation Society
Suffolk Wildlife Trust
The Beccles Society
The Broads Society
The Bungay Society
The Halesworth & Blyth Valley Partnership
**Appendix D - Standardised site assessment pro-forma**

<table>
<thead>
<tr>
<th>Current use:</th>
<th>Surrounding uses and character of surroundings:</th>
<th>Physical constraints, (e.g. steep slopes, access, natural features, pylons)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Flood Risk (tick box)</th>
<th>Flood Risk Zone 2+3a unless in Lake Lothing and Outer Harbour Area Action Plan area</th>
<th>Flood Risk 2+3a if within Lake Lothing and Outer Harbour Area Action Plan area</th>
<th>Flood Zone 1</th>
</tr>
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<tbody>
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<table>
<thead>
<tr>
<th>Contamination (tick box)</th>
<th>n/a</th>
<th>Potentially contaminated</th>
<th>No known contamination</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<table>
<thead>
<tr>
<th>Comments:</th>
<th></th>
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<table>
<thead>
<tr>
<th>Hazardous Area (tick box)</th>
<th>n/a</th>
<th>Site is within 250m of hazardous installation</th>
<th>The site is outside of 250m of any hazardous installation.</th>
</tr>
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<table>
<thead>
<tr>
<th>Coastal Erosion (tick box)</th>
<th>Within Coastal Change Management Area</th>
<th>Within 30m of Coastal Change Management Area</th>
<th>No within 30m of Coastal Change Management Area</th>
</tr>
</thead>
<tbody>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Minerals sites</th>
<th>Development</th>
<th>n/a</th>
<th>No impact on</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(tick box)</td>
<td>would result in sterilisation of a identified mineral deposit in the Minerals LDF</td>
<td>known minerals sites</td>
<td></td>
</tr>
<tr>
<td>-----------</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Visual Landscape</th>
<th>n/a</th>
<th>Adjacent to Area of Outstanding Natural Beauty, Heritage Coast or Broads or otherwise likely have an impact on these designations.</th>
<th>No impact on any landscape designation or wider landscape.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

Comments:

<table>
<thead>
<tr>
<th>Nature Conservation Designations</th>
<th>n/a</th>
<th>Likely impact on a County Wildlife Site, Local Nature Reserve, Roadside Nature Reserve, and regionally important geological sites.</th>
<th>No likely impact on a County Wildlife Site, Local Nature Reserve, Roadside Nature Reserve, and regionally important geological sites.</th>
</tr>
</thead>
<tbody>
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</table>

Comments:

<table>
<thead>
<tr>
<th>Heritage</th>
<th>Detrimental to setting of Scheduled Ancient Monument, Grade I &amp; II* built environment designations</th>
<th>Within Conservation Area or adjacent or near to Listed Buildings and Locally Listed buildings</th>
<th>No Conservation Area or built environment designations.</th>
</tr>
</thead>
<tbody>
<tr>
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</table>

Comments:
<table>
<thead>
<tr>
<th>Impact on aquifers</th>
<th>n/a</th>
<th>At least part of site within a groundwater Source Protection Zone</th>
<th>No part of site within a groundwater Source Protection Zone</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Local service provision</td>
<td>Results in loss of viable local services such as shops, public houses or community facilities</td>
<td>n/a</td>
<td>Does not involve the loss of viable local services such as shops, public houses or community facilities</td>
</tr>
<tr>
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<tr>
<td></td>
<td>Comments:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Open Space</td>
<td>n/a</td>
<td>Development is on open space as protected by Policy DM25 and therefore replacement is needed.</td>
<td>Development does not result in the loss of open space</td>
</tr>
<tr>
<td></td>
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</tr>
<tr>
<td></td>
<td>Comments:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transport Impacts</td>
<td>Unacceptable impact on functioning of trunk roads and local roads that cannot be mitigated</td>
<td>Impact on functioning of trunk roads and local roads that can possibly be mitigated</td>
<td>No detrimental impact on functioning of local roads and trunk roads.</td>
</tr>
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<tr>
<td></td>
<td>Comments:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Access to Site</td>
<td>No suitable on-site access with no scope for improvements</td>
<td>Access improvements required</td>
<td>No access issues</td>
</tr>
<tr>
<td>----------------</td>
<td>----------------------------------------------------------</td>
<td>-------------------------------</td>
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</tr>
<tr>
<td>Comments:</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Access to Facilities</th>
<th>n/a</th>
<th>Access to none/one facility</th>
<th>Access to two or more facilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comments:</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Proximity to noise and (tick box) other pollutants</th>
<th>Likely impact from noise and other pollutants</th>
<th>No likely impact from noise and other pollutants</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comments:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Infrastructure capacity (sewage capacity, water supply capacity, electricity capacity)</th>
<th>n/a</th>
<th>No Available capacity/infrastructure needed</th>
<th>Available capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comments:</td>
<td></td>
<td></td>
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</tbody>
</table>
Appendix E – Viability Assessment

Where sites assessed in this SHLAA have identified constraints that need to be overcome in order for the site to be deliverable a viability assessment will be required.

The most common method for assessing the viability of a site is the residual land value method. It is this method which is promoted by the Homes and Communities Agency through the Economic Appraisal Tool. Residual land value is the gross development value of a development minus the costs of development and developer profit. It is the sum of money that a developer can afford to pay for the land. The critical test of viability of development is whether the residual land value is greater than the existing land value of the site or an alternative use land value. The diagram below seeks to explain this more clearly.

Of course, just because residual land value is above an existing use or alternative use doesn’t mean a landowner will be willing to sell the land to the developer. The landowner is likely to want an incentive to sell in the form of an uplift in land value from its existing value. For example, if the residual land value is only marginally higher than the existing use value of agricultural land, the landowner would probably hold on to the land as he/she would receive a greater income from continuing to farm the land as opposed to disposing of the asset. Therefore in order for development on a site to occur the residual land value is normally going to have to be significantly higher than the existing use value of the land. Clearly there is no exact science to this, as different landowners will have different aspirations. However, it is important that some justified assumptions are made to what an acceptable uplift above existing use value might be to ensure the SHLAA has an objective test to viability. This uplift will be ascertained through consultation with property agents and developers with regard to past transactions, strength of housing demand and supply of land.

Viability assessments will be carried out using the Homes and Communities Agency’s Economic Assessment Tool. As the viability assessment will be high-level with detail on many issues unknown, broad assumptions will be required with respect to development costs.
The viability assessment will make the following assumptions:

- Developer’s profit on gross development value will be 17%
- Professional fees will be 12% of development costs
- Affordable homes will be assumed to be cost only in relation to land take and site works. Therefore will not generate a value or have a unit build cost. This will help keep the assessment simple
- Build costs will be based on BCIS regional averages
- A contingency of 5% of build costs will be included
- Code for Sustainable homes costs will be included as per the latest Government guidance.
- Contamination and demolition costs will be based on the English Partnership paper “Contamination and Dereliction Remediation Costs”