



**GREAT YARMOUTH**  
BOROUGH COUNCIL

# **Great Yarmouth Borough Strategic Housing Land Availability Assessment**

**Final Methodology**

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## **Preface**

Great Yarmouth Borough Council is preparing a Local Development Framework (LDF) to establish a long-term spatial planning strategy to create sustainable communities. The Core Strategy Development Plan Document (DPD) is the overarching document in the LDF and sets out the overall vision and spatial planning strategy for the Borough. The Site Specific Allocation DPD will allocate land for development in accordance with the Core Strategy.

Planning Policy Statement 3: Housing requires that Housing Market Assessments and Strategic Housing Land Availability Assessments are undertaken to inform the LDF. The Council published a joint Housing Market Assessment with Waveney District Council in September 2007 and is now undertaking a Strategic Housing Land Availability Assessment (SHLAA). This document forms the final methodology.

During the preparation and consultation of the Site Specific Allocation DPD Issues and Options in January 2007, an adequate number of sites were put forward for consideration for residential development to reach the required dwelling targets.

The Strategic Housing Land Availability Assessment (SHLAA) will be part of the necessary evidence base that looks to filter out sites deemed unsuitable for development and go further to suggest appropriate timescales for sites which are suitable for residential development. **Please note that the SHLAA will not be allocating sites for development.**

## **1.0 Introduction**

Planning Policy Statement 3: Housing (PPS3) published in 2006 seeks a responsive approach to land supply at the local level with regard to the recommendations set out in the *Barker Review of Housing Supply* (2004). In particular, it sets out a framework that aims to improve affordability and the supply of homes in all communities by ensuring that land availability is not a constraint on the delivery of homes. The changes require local authorities to:

- identify specific, deliverable sites for a five year period that are ready for development and to keep this sustained over time in response to market information
- identify specific, deliverable sites for 6-10 years and where possible for 11-15 years
- where it is not possible to identify sites for 11-15 years, to indicate broad locations for future growth

The Great Yarmouth Borough Strategic Housing Land Availability Assessment (hereafter to be referred to as the Assessment) is a comprehensive study undertaken by the Council to assess the deliverability and developability of housing land and is in response to PPS3's requirement that a robust evidence base should inform the preparation of Local Development Documents.

This final methodology report builds upon the initial draft methodology that was consulted upon and agreed with key stakeholders such as national and regional house builders, social housing landlords, public sector organisations and other bodies with a vested interest.

## **1.1 Context and Key Principles**

### **1.11 Strategic Housing Land Availability Assessment (SHLAA)**

In 2007 the Government published a standardised methodology for conducting the Assessment within their *Practice Guidance*<sup>1</sup>. It states that the purpose of the SHLAA is to:

- identify sites with potential for housing
- assess their housing potential
- determine a realistic timescale when they are likely to be developed

**The Assessment does not allocate land for development.** The Assessment is background evidence to inform the emerging Local Development Framework (LDF) on future development and the allocation of land for housing. The Assessment will consider a wide range of possible options for residential development. However, the undertaking of this Assessment does not pre-empt or prejudice any decision the Council may make in the future with regard to potential housing designations. Sites that could be allocated in future Local Development Documents will be made through the statutory plan process.

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<sup>1</sup> Strategic Housing Land Availability Assessments; Practice Guidance 2007 (Department for Communities and Local Government.) [www.communities.gov.uk](http://www.communities.gov.uk)

To remain a useful planning tool for the delivery of housing, the Assessment will need to be thorough in its identification and assessment of potential sites and updated on an annual basis as part of the LDF's Annual Monitoring Report.

### **1.12 Core Requirements of the SHLAA**

As a supporting document, and as part of a robust and credible evidence base for the LDF, the Assessment must<sup>2</sup>:

- include a list of sites, cross-referenced to maps showing locations and boundaries of specific sites (and showing broad locations, where necessary)
- assess 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
- identify the potential quality of housing that could be delivered on each identified site or within each identified broad location (where necessary) or on windfall sites (where justified)
- comment on the constraints on the delivery of identified sites
- recommend how identified constraints could be overcome and on what timescales

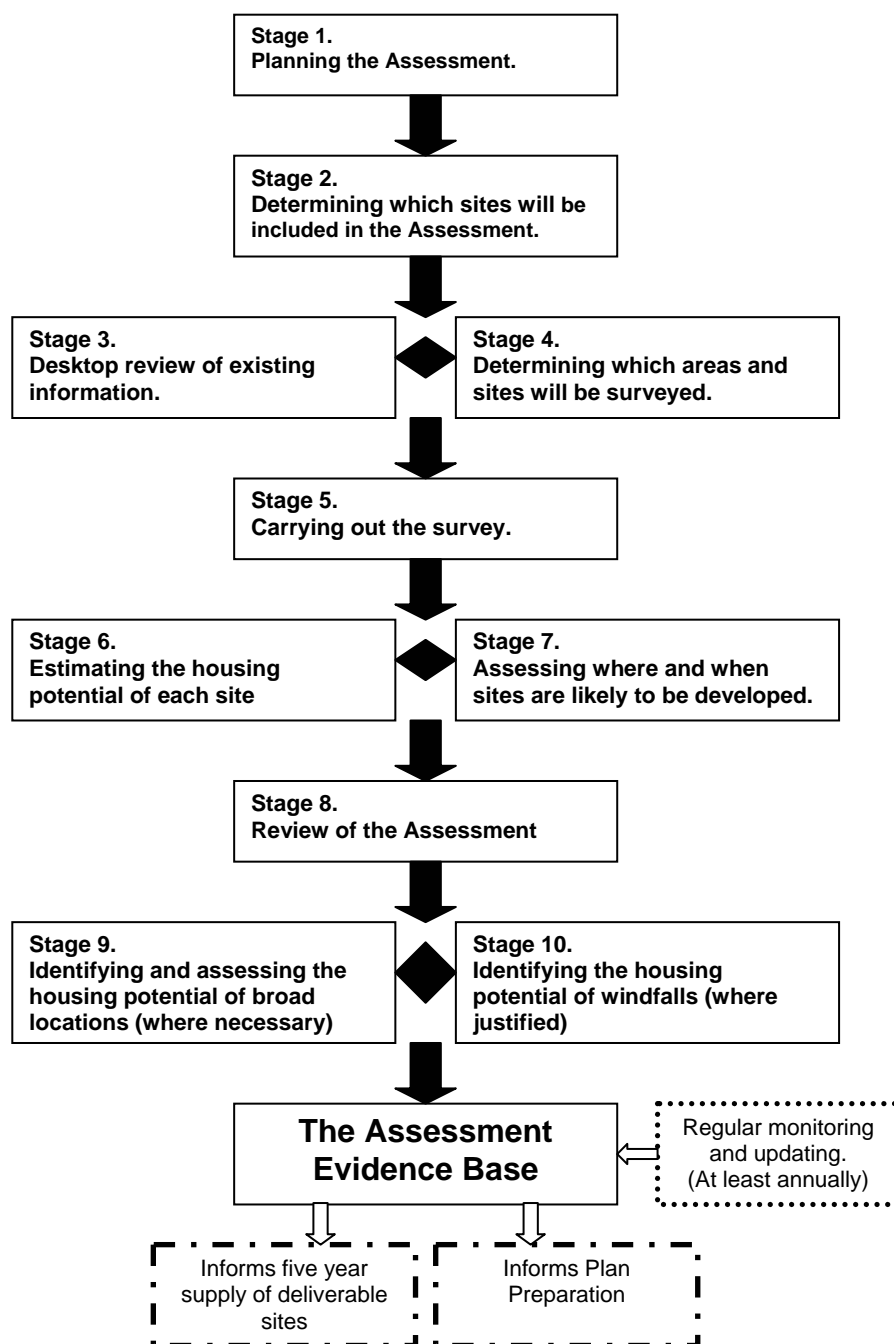
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<sup>2</sup> pp.7. Strategic Housing Land Availability Assessments; Practice Guidance 2007 (Department for Communities and Local Government.) [www.communities.gov.uk](http://www.communities.gov.uk)

## 2.0 The Methodology

The methodology used to assess sites will closely follow the approach outlined in the SHLAA Practice Guidance which is illustrated in the flowchart below. This will ensure that the “Assessment findings are robust and transparently prepared”<sup>3</sup> and will not need to demonstrate or justify the methodology approach that has been sought.

**Figure 1: SHLAA Approach**



<sup>3</sup> Para. 15. Strategic Housing Land Availability Assessments; Practice Guidance 2007 (Department for Communities and Local Government.) [www.communities.gov.uk](http://www.communities.gov.uk)

## **2.1 Stage 1: Planning the Assessment**

Strategic Housing Land Availability Assessments have been undertaken by neighbouring local authorities including North Norfolk, Breckland and the Greater Norwich area. It is suggested in the SHLAA Practice Guidance that Assessments should be produced in partnership with local planning authorities that share a sub-regional housing market area<sup>4</sup>.

Great Yarmouth shares a sub-regional housing market area with Waveney District Council, who, in November 2007 completed their Assessment. Great Yarmouth Borough Council will therefore undertake the Assessment on its own.

The Assessment is a technical document and will take into consideration a number of contributing factors to assess the deliverability and developability of sites. To guide the Assessment comprehensively, a partnership approach has been taken.

To achieve this, a Working Party, with the responsibility of steering the Assessment methodology to ensure it can robustly underpin the housing element of the Core Strategy Development Plan Document (DPD), was set up. The members of the Working Party included house builders, local property agents and relevant government advisory bodies such as the Environment Agency and Natural England.

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<sup>4</sup> *Para. 11.* Strategic Housing Land Availability Assessments; Practice Guidance 2007 (Department for Communities and Local Government.) [www.communities.gov.uk](http://www.communities.gov.uk)

## **2.2 Stage 2: Determining the Sources of Sites**

SHLAAs are an important part of the policy informing process. They provide information on potential opportunities to meet the level of need and demand for housing in the area.

It is important that the Assessment explores a variety of sources to discover potential residential sites, and yet the Assessment's approach must remain strategic in as it must only assess sites where evidence or circumstances suggest that they would be appropriate for housing development.

### **2.21 Policy Exclusions**

It is stated in the SHLAA Practice Guidance that where justified, the Assessment may exclude particular types of land or areas from the Assessment<sup>5</sup>, however, the scope of the Assessment should not be narrowed down by existing policies designed to constrain development. It was agreed by the SHLAA Working Party that sites within the curtilage of international nature conservation designation areas and sites within Flood Risk Zone 3b (as defined by Planning Policy Statement 25: Development and Flood Risk) should be excluded from the Assessment at the outset. This is justified below.

**Nature Conservation Designations:** The borough has a natural environment that is rich in biodiversity and includes internationally recognised nature designations such as Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites.

Alongside these, the borough also contains a wealth of nationally and locally significant nature conservation sites that includes National Nature Reserves (NNRs), Local Nature Reserves (LNRs), County Wildlife Sites (CWSs) and County Geological Sites (CGSs).

Due to the international importance of SPAs, SACs and Ramsar sites under the EU Habitats Directive and, the duty placed upon local authorities to preserve the integrity of designated nature conservation sites<sup>6</sup>, it is concluded that:

- **Any site that is within the curtilage of an internationally and nationally recognised nature conservation designation will be excluded from the Assessment;**
- **Any site adjacent to the curtilage and up to 500m of an internationally recognised nature conservation area will require consultation with Natural England with a view to excluding the site if recommended by the advisory body.**
- **Any site adjacent to the curtilage and up to 500m of a County Wildlife site will require consultation with Norfolk Wildlife Trust with a view to excluding the site if recommended by the advisory body.**

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<sup>5</sup> Para 21. Strategic Housing Land Availability Assessment (2006) DCLG

<sup>6</sup> Para 6 & 7 Planning Policy Statement (PPS) 9 Biodiversity and Geological Conservation (2005) DCLG

Where sites are adjacent to, or up to 500m of any other local nature conservation designations, they will remain in the Assessment and applied to a criteria based assessment in Stage 7 which will determine the level of impact developing the site may have.

**Flood Risk Zone 3b:** Planning Policy Statement (PPS) 25: Development and Flood Risk enforces a Sequential Approach to site selection, whereby sites (residential) are classed according to their suitability in flood risk areas.

It is illustrated in Table D.2 of PPS25 that residential development is classed as a 'more vulnerable' and is therefore not appropriate in Flood Risk Zone 3b (functional floodplain). In addition, residential sites are only allowed in Flood Risk Zone 3a if the Exception Test (which must demonstrate that other sites that are at lower risk of flooding are not suitable) is passed.

Due to the low lying topography and coastal position, the borough is mainly affected by tidal flooding and has large areas within Flood Risk Zone 2 and 3a and some within Flood Risk Zone 3b.<sup>7</sup> However Great Yarmouth is identified in the East of England Plan<sup>8</sup> as a priority area for regeneration and has been preparing, in partnership with the Urban Regeneration Company 1stEast, an Area Action Plan to regenerate major brownfield waterfront sites in Great Yarmouth and Gorleston.

Therefore sites within Flood Risk Zones 2 and 3b will be included in the Assessment. Sites that are within Flood Risk Zone 3b will be automatically excluded from the assessment unless these sites contribute to the intervention areas set out in the draft Urban Regeneration Company Area Action Plan.

## **2.22 Site Identification**

Sites that will be included in the Assessment will be sourced from the following areas:

- Sites that are allocated in the Local Plan
- Sites that are in the Planning Process
- Sites that are not in the Planning Process

**Sites allocated for residential use in the Local Plan:** The Great Yarmouth Borough-Wide Local Plan (2001) allocates sites for residential development in order to meet the Borough's housing land requirement. Sites which remain undeveloped will be assessed on their future potential using current criteria.

### **Sites allocated for non-residential uses in the Local Plan:**

a) *Employment Sites:* Local Plan policies EMP2-7 and East of England Plan (Regional Spatial Strategy) policies E2-3 are designed to create and implement sustainable economic growth locations throughout the borough during the plan period. Where there is an excess of employment land in the borough, sites may have potential for residential development.

The borough has a requirement for employment land as identified in the Great Yarmouth and Waveney Employment Land Study (2006). Therefore, any existing Local Plan allocations for employment use will in the main be retained. It should be

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<sup>7</sup> Identified in the Great Yarmouth Strategic Flood Risk Assessment (2009) Captia Symonds

<sup>8</sup> East of England Regional Spatial Strategy (2008) Government Office East of England.

noted that in light of the emerging URC AAP, town centre locations will be developed as a mix of uses.

*b) Educational/Primary Care Trust uses:* Providing adequate healthcare and educational facilities are important components creating healthy and sustainably inclusive communities.

The borough of Great Yarmouth suffers from a higher mortality and lower educational attainment rate than most of the other local authority district areas within the East of England region. With development to the borough over the plan period, the existing pressure upon healthcare and educational facilities is likely to increase with rising populations. It can be presumed therefore, that sites currently used for healthcare or educational uses are not considered suitable for residential development. Any uses surplus to the requirements of the borough could be considered for alternative uses.

*c) Retail Uses:* The borough of Great Yarmouth is identified in the East of England Plan as a town of strategic importance for retail and town centre purposes.<sup>9</sup>

The Great Yarmouth and Waveney Retail & Leisure Study (2006) concluded that there is limited need for new convenience (food) good retailing and a substantial need for new comparison (non-food) good retailing. Due to the needs, it can be presumed that sites currently used for retail purposes will not be considered suitable for residential development.

*d) Recreational/Open Space uses:* Providing sufficient green open space and local recreational areas are important to maintain a cohesive society that has health and wellbeing at its centre.

PPG17 requires local planning authorities to undertake a Local Needs Assessment to establish the level of open and recreational space in the local area. The policy also states that where an assessment has been undertaken which clearly shows the level of open space or buildings are surplus to requirements, the land may be developed.

The Council is in the process of updating it's Local Needs Assessment, therefore any existing open space/recreation allocations will not be included, and any existing open space or recreation sites submitted will not be taken forward in the Assessment.

However if the final report of the Local Needs Assessment concludes that the borough has an over supply of open or recreational space, a review of the Assessment will take into consideration any surplus sites for alternative uses.

*e) Primary Holiday Accommodation Areas:* Great Yarmouth is one of the UK's most popular tourist destinations and the industry is Great Yarmouth's largest employment sector directly and indirectly representing an economic value of £461 million per annum (2007) and 32% of the borough's employment. Improving the tourism offer for the borough includes the enhancement and consolidation of its tourist facilities and holiday accommodation.

Due to the economic benefits of retaining the Primary Holiday Accommodation areas, it can be presumed that currently operating sites allocated for such uses will not be considered suitable for residential development.

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<sup>9</sup> Policy E5, East of England Plan (2008) DCLG

**Sites that are in the Planning Process: Planning Permissions:** The Assessment will identify planning permissions to assess their deliverability and developability.

Planning permission is usually granted for three years, during which time development must start. The Assessment will identify sites that have been granted in the three years prior to 31 March 2009 for 10 dwelling or more and have not started.

**Sites that are in the Planning Process: Refused Planning Permissions:** Sites which have been refused planning permission will be as sites may be considered developable in the future. These sites will be included in the Assessment.

To minimise unnecessary work, the review will only survey sites that meet all of the following criteria:

- **Refused residential planning applications in the three years prior to 31 March 2009**
- **Within or adjacent to existing settlements**
- **Are 10 dwellings or above in proposal.**

**Sites not in the Planning Process: Call for Sites:** A 'call for sites' is where landowners are asked by the Local Planning Authority to submit sites which they believe may have residential development potential. This approach is beneficial as sites which are being promoted give a strong indication that they are potentially available and developable. The Assessment will use two previous 'call for sites' to gather information:

- **Sites put forward as part of the Site Specific Allocations Development Plan Document (DPD) process between February 2006 and January 2007**
- **Sites put forward as part of the SHLAA methodology consultation between November 2008 and December 2008**

### **2.23 Desktop Review of Sites (Stage 3 in parallel with Stage 2)**

There will be a number of unidentified sites in the borough which may have a reasonable prospect of accommodating residential development however the landowner(s) may be unaware of the development potential.

The SHLAA Practice Guidance illustrates a number of sources and studies that can be used to identify potentially suitable sites for residential development and can provide additional information to inform the potential developability and deliverability of sites. These are listed below:

*a) Urban Housing Potential Study (Baker Associates, 2004):* The Great Yarmouth Urban Housing Potential Study (UHPS) assessed existing brownfield sites within the borough which were considered to be potentially suitable for housing. The UHPS study will be cross referenced to identify any sites that have been previously put forward as expression of interest or have been developed out.

*b) National Land Use Database (NLUD):* The NLUD Database is completed annually, assessing the amount of previously developed and vacant land in the Borough. Similar to the UHPS Study, the database will be cross-referenced to remove any duplication.

Smaller studies such as the Housing Condition Survey and the Register of Surplus Public Sector Land are studies that inform each annual NLUD return. It is assumed

that any sites sourced in these two studies automatically update the annual NLUD, and will not need to be reviewed individually for the Assessment.

*c) Housing Land Availability Schedule:* The schedule is completed annually to record the number of dwellings that have planning permission and have either not started, are under construction or have been completed each year. Where sites have not started, the Assessment will determine the feasibility of increasing the potential yield on each planning permission.

The schedule also helps to validate sites and cross reference any duplication.

*d) Ordnance Survey Maps and Aerial Photographs:* Viewing Ordnance Survey maps and aerial photographs will help to identify vacant sites that have otherwise not been identified. This approach can be resource intensive so Development Control Officers of the Council will impart their knowledge of potential sites and comment upon those being taken forward.

## **2.3 Stage 4: Determining which sites and areas will be surveyed**

At this stage of the Assessment, a large number of sites will have been identified both through the planning process and the desktop review. For the approach to remain strategic, sites that are taken forward will need to adequately demonstrate an initial level of suitability for residential development.

The SHLAA Practice Guidance states that where justified, particular land or areas may be excluded from the assessment. If a site is located in an unsustainable location i.e. on greenfield land, and a reasonable distance away from nearby settlements may not be necessarily a sustainable option for residential development. In the Assessment, unsustainable sites that are excluded will be excluded from the testing stages and ascribed as having 'nil' potential for housing.

### **2.31 Policy Context**

To identify sustainable areas for development, the Assessment will consider the policies expressed in National Planning Policy Statements and the adopted East of England Plan (2008).

**Planning Policy Statement 1: Delivering Sustainable Development:** PPS1: Delivering Sustainable Development is the key planning policy statement which emphasises sustainable development as being the core principle that underpins and shapes planning.

To achieve sustainable and inclusive patterns of urban and rural development, it requires land to be made available that is in line with economic, social and environmental objectives.

It further states that development should improve the quality of people's lives by contributing towards sustainable economic development whilst protecting and enhancing the natural, historic environments, quality and character of the countryside and existing communities.

**Planning Policy Statement 3: Housing:** PPS3: Housing is the key policy document on meeting the housing development.

It requires the following considerations to be taken into account when identifying broad locations and specific sites suitable for housing development:

- that new development should be focussed in locations with good public transport accessibility and/or by means other than the private car.
- that any physical, environmental, land ownership, land-use, investment constraints or risks associated with broad locations or specific sites, such as physical access restrictions, contamination, stability, flood risk, the need to protect natural resources eg water and biodiversity and complex land issues should be addressed.
- The accessibility of a proposed development to existing local community facilities, infrastructure and services including public transport. The location of housing should facilitate the creation of communities of sufficient size and mix to justify the development of, and sustain, community facilities, infrastructure and services.

PPS3 also states that options to accommodate new housing growth should include the re-use of vacant and derelict sites or, industrial and commercial sites as part of mixed use town centre developments, intensification of housing established in residential areas and expanding settlements through urban extensions and freestanding settlements.

It also suggests that housing will need to be provided in rural areas, outside of market towns and local service centres, to enhance or maintain their sustainability.

**East of England Plan:** The adopted East of England Plan (2008) is the regional tier of the statutory development plan and informs the LDF

The East of England Plan (2008) sets out the minimum housing targets that must be achieved in the borough within the plan period.

Policy SS3 is to concentrate sustainable development in Key Centres for Development and Change to make more efficient use of the infrastructure that is supported by it. Great Yarmouth is designated as a Key Centre of Development and Change, therefore the emphasis should be to concentrate housing development within the town.

Policy SS4 guides development in towns other than those listed as Key Centres for Development and Change and in rural areas such as market towns.

The borough of Great Yarmouth does not have any market towns beyond the Great Yarmouth urban area. However the sub text to policy SS4 identifies the potential for Key Service Centres to accommodate development that is sympathetic to local character and of an appropriate scale and nature to meet local housing and employment needs. The policy also suggests that development in rural settlements, particularly affordable housing, should support the viability of agriculture and other economic activities and support local needs and diversification.

**Great Yarmouth Borough Council Local Development Framework:** The emerging Core Strategy DPD is at Regulation 25 stage and is currently underpinned by a wide ranging evidence base. This evidence will inform the methodology for the Assessment.

### **2.32 Sites to be surveyed**

To meet the Government's sustainability requirements the Assessment will only survey sites that could actively contribute towards sustainable development.

There is limited scope to allowing housing in rural areas which can increase village vitality by increasing the supply of affordable housing and diversifying economic activities. However the focus is to locate housing development within the urban areas and established settlements.

Taking this into consideration, sites that have been identified through the desktop review and call for site's consultations will only be surveyed on site in or adjacent to the following settlements:

Great Yarmouth	Burgh Castle
Gorleston-on-Sea	Filby
Bradwell	Fleggburgh
Caister-on-Sea	Fritton with St Olaves
Hemsby	Ormesby St Michael
Hopton-on-Sea	Repps with Bastwick
Martham	Rollesby
Ormesby St Margaret	Winterton-on-Sea

Stokesby, Thurne, West Caister and West Somerton do not have village development limits in the Great Yarmouth Borough-Wide Local Plan (2001). These are unsustainable locations to support new development.

### **2.33 Site size threshold**

It would be resource intensive to identify all small sites within and beyond the main urban area and other settlements. Therefore, the Assessment will use minimum site size thresholds.

A site size threshold should reflect different densities that are likely to be achieved within and outside the main urban areas. Therefore two site size thresholds will be used: one within the urban area (within the development limits of Great Yarmouth and Gorleston-on-Sea), and the other in the rural area (adjacent to the development limits of Great Yarmouth and Gorleston-on-Sea and within or adjacent to development limits of all other settlements defined in 2.32).

A density of 50dph and 30dph respectively, for urban and rural areas is assumed as an average density that is potentially suitable in the two areas (see Stage 6).

It is assumed that sites capable of creating 10 or more dwellings are not classed as windfall development in accordance with the Great Yarmouth Borough-Wide Local Plan (2001), and therefore will be regarded as a minimum site size threshold to identify sites.

In order to make the above assumptions site specific, the following site size thresholds have been calculated in Table 1.

**Table 1: Site Size Thresholds**

Settlement	Site Size Threshold
Urban Area (Great Yarmouth and Gorleston-on-Sea)	<b>0.2ha</b> - equivalent of 10 dwellings @ 50 dwellings per hectare.
Rural Area (all settlements outside of Great Yarmouth and Gorleston-on-Sea)	<b>0.33ha</b> - equivalent of 10 dwellings @ 30 dwellings per hectare.

### **2.34 Summary**

Stages 2, 3 and 4 of the Assessment will be undertaken in parallel with each other to determine which sites should be site surveyed and taken forward to the testing stages of the Assessment.

The parameters setting out which sites will be excluded will be based upon flood risk and nature conservation designations, whether the site is not within or adjacent to a settlement, or if the size of the site is below that of the appropriate threshold illustrated in Stage 4 (see Table 1).

Any sites that are excluded due to the location or size of the site will remain recorded. However the housing potential will be ascribed as 'nil'. If the final results of the Assessment conclude that insufficient sites cannot demonstrate a continuous 5 year supply of housing, the Assessment may consider sites outside of the village development limits (Stage 9), or, release smaller sites considered as potential windfall (Stage 10).

## **2.4 Stage 5: Carrying out the survey**

Sites that progress from Stages 2, 3 and 4 will be surveyed on-site to ensure that the details and any constraints are recorded accurately.

Site surveys will be undertaken in a consistent manner to ensure that they are unbiased and demonstrate an accurate representation of the site. Surveys will be undertaken by the Planning Policy Team guided by the general survey principles featured in the SHLAA Practice Guidance, shown below:

- **Site size**
- **Site boundaries**
- **Current use(s)**
- **Surrounding land use(s)**
- **Character of surrounding area**
- **Physical constraints e.g. access, steep slopes, potential for flooding, natural features of significance and location of pylons**
- **Development progress; e.g. ground works completed, number of homes started and number of homes completed**
- **Initial assessment of whether site is suitable for housing and housing as part of a mixed use development**

The survey principles listed above are intended to be general. To address local issues, the following will also be considered:

- **Flood Risk**
- **Contaminated Land**
- **Coastal Erosion**
- **Infrastructure/access to services**

In addition to the site specific issues provided above, the Assessment will gather information on contextual issues such as **landscape, conservation and planning history**.

It is important to reiterate that any issues, constraints or implications gathered on any sites as part of the site survey will not predetermine whether a site is suitable, available or achievable for development. The site survey will merely gather information for each site so that the testing stages of the Assessment are well informed in order to make accurate assumptions and justifications.

When undertaking the site surveys, each site will be mapped and information recorded in the SHLAA database. Each site will correspond to a unique reference number. The database will be reviewed and updated regularly in the event of any new site information coming forward.

## 2.5 Stage 6: Estimating the Housing Potential

Calculating the housing potential for each site is an important factor that will influence the marketability of a site and will also determine if a site is deliverable. Due to synergies between densities and deliverability, it is considered that Stage 6 (estimating the housing potential) and Stage 7 (assessing when and whether sites are likely to be development) will be undertaken in parallel.

### 2.51 Density Thresholds

PPS 3: Housing seeks to encourage local authorities to set a range of densities across their plan area<sup>10</sup>, therefore a hierarchy of densities should reflect the varying urban and rural areas in the borough such as the town centre, edge of centre and out of town areas.

Waterfront sites are proposed strategic sites that have the potential to deliver a significant proportion of the borough's housing completions target to 2026. The assessment of the waterfront sites and their deliverability will be crucial when informing the Core Strategy DPD, therefore an additional tier to the hierarchy enabling waterfront sites should be added (Table 3).

**Table 2 Density Hierarchy**

Density	Location
65	Waterfront sites (URC)
65	Town centre
50	Edge of centre
40	Edge of town
30	Out of town

### 2.52 Justification for Threshold Classes

**Waterfront Sites:** Waterfront sites have been identified in the Urban Regeneration Company (URC) Area Action Plan (AAP). Overall these sites do not currently have planning permission but are considered as strategic sites for the emerging Core Strategy DPD as they have the potential to provide a significant proportion of the housing required in the borough over the next 15 years.

**Town Centre:** The limit of the town centre for the purpose of the Assessment will be based upon the town centre limits for Great Yarmouth and Gorleston-on-Sea, illustrated in the Great Yarmouth Borough – Wide Local Plan (2001).

**Edge of Centre:** By widening the parameters beyond the town centre, the next sequential threshold area is classed as 'edge of centre'. This will be defined by the area known as 'edge of centre' in the Great Yarmouth Borough – Wide Local Plan (2001), or be within 300 metres of the town centre boundary limit, as defined by Planning Policy Statement (PPS) 4: Planning for Sustainable Economic Growth<sup>10</sup>.

<sup>10</sup> Para 45. Planning Policy Statement 3: Housing (2006) DCLG

<sup>10</sup> pp 26. Planning Policy Statement 4: Planning for Sustainable Economic Growth (2009) DCLG

- For sites that are partly within the 300m radii, a site will be considered as edge of centre where at least 60% of the site is within the edge of centre boundary line.
- For sites that are within the URC area but designated as an Edge of Centre site, the site will be considered as being wholly within the URC area and therefore the URC density multiplier will apply.

**Edge of Town:** Outwards from the edge of centre, any sites that fall between the edge of centre limit and the town development limits, as defined by the Great Yarmouth Borough – Wide Local Plan (2001) will be defined as ‘edge of town’.

**Out of Town:** ‘Out of town’ sites will be defined as sites that fall beyond the town development limits but are adjacent to town development limits or within or adjacent to village development limits.

Any sites that fall outside and are not adjacent or relatively close to the village and town development limits will not be included in the Assessment, being contrary to the sustainable development principles as defined in PPS1 (para 27).

### **2.53 Justification for Appropriate Densities**

The proposed densities are not a minimum or maximum ceiling that must be achieved and they will be flexible. However, they will conform to the national minimum of 30 dwellings per hectare (dph). Where a mix of densities may need to be achieved, sites will benefit from calculating the housing potential in parallel with the suitability, availability and achievability testing stages.

The justification given for each tier of the density multipliers is given below:

**Waterfront Sites:** It is considered that the waterfront sites could be developed at approximately 65dph. This is due to their central waterfront location with good access to facilities and services.

A waterfront development at Haven Bridge was built at over 170dph.

**Town Centre:** It is perceived that town centre sites could be developed at approximately 65dph. This is due to their central location with good access to facilities and services.

The evidence to underpin this approach is unreliable as only one completion in the defined town centre area has been documented in the last 3 years (over 10 dwellings). This had a density of 84dph.

**Edge of Centre:** It is perceived that edge of centre sites could developed at approximately 50dph.

This has been set deliberately lower than the actual average completion density of 135dph between 2006 and 2009. It would be inappropriate to assume that any sites identified in the SHLAA within the edge of centre designation should conform to this high density as they would be out of character.

**Edge of Town:** It is perceived that edge of town sites could be developed at approximately 40dph.

Historically, housing completion evidence from between 2006 and 2009 for all sites being defined as ‘edge of town’ had an average density of 80dph. On sites of 10 or more dwellings the average density is 45dph.

This was considered as being high as it took into consideration a number of small, high intensity completions (1-2 dwellings) of flats over shops, thereby creating high densities.

**Out of Town:** Sites within or adjacent to village development limits could be developed at approximately 30dph<sup>11</sup>.

By building densities at 30dph, the scale, context and massing of developments will reflect the character of the settlement.

### **2.54 Additional multipliers**

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 multipliers should be applied:

**Table 3: Irregular site multiplier**

Site description	Shape multiplier $\chi$ (number of proposed houses multiplied by $\chi$ )
Site is regular in shape	1
Site is irregular in shape and compromises development potential	0.75

<sup>11</sup> Para 47. Planning Policy Statement 3 Housing (2006) DCLG  
Great Yarmouth Borough Council Strategic Housing Land Availability Assessment  
(March 2010)

## **2.6 Stages 7 (a, b and c): Assessing when and whether sites are likely to be developed**

In parallel with estimating the housing potential of sites (Stage 6), the Assessment will undertake a thorough review of the suitability, availability and achievability of sites to determine which are considered deliverable and developable.

For the purposes of the Assessment, the SHLAA Practice Guidance illustrates that a site will be considered as 'deliverable' where it is available now, offers a suitable location for housing development and has a reasonable prospect that the housing will be delivered within the first 5 years of adoption of the plan. Where sites do not conform to the above definition, a site will be considered as 'developable' where it is in a suitable location for housing development, and, there is a reasonable prospect that it will be available for, or could be developed at a specific point in time.

There will be circumstances where a site is unable to be developed or is unavailable within the 0-15 year time frame; this can be due to constraints that are unable to be overcome, or through a lack of available information. Where this is the case, the site will be considered as 'not currently developable'.

Sites that are 'not currently developable' will remain within the SHLAA database and reviewed in the event of changing circumstances or additional information coming forward which could potentially enable the site to be considered as deliverable or developable.

### **2.61 Stage 7a: Assessing the Suitability for Housing**

The SHLAA Practice Guidance illustrates 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.

Whether a site is suitable or not will be dependant upon cumulatively assessing each site upon a range of suitability criteria. These can be categorised into 3 areas:

- **Restrictions:** criteria that are based upon national restrictions or policy that is likely to require mitigation or works to make a site viable.
- **Potential impacts:** criteria that are based upon the effects a site may have on social, economic or environmental issues.
- **Physical qualities of the site:** criteria that are based upon what is on, or not on a site, or may require investment to overcome.

Each suitability criteria will be subdivided into varied levels of constraints based upon the information collected at Stage 5. This will be displayed within a suitability matrix (Table 5) to clearly illustrate the extent of the site's suitability and provide commentary on any identified constraints and the potential for these to be overcome.

This will be clarified further when the actions to overcome constraints will be viability tested in order to account for the abnormal costs associated with developing a potential site. However, if a site's suitability is significantly brought into question, the site will be considered as 'wholly constrained', discounted from the viability assessment and considered as 'not currently developable'.

A summary of each suitability criteria is provided below:

## **2.62 Restrictions**

**Flood Risk:** Flood risk will be assessed against the following criteria:

- ***Where a site is within Flood Risk Zone 2 or 3a it will be considered as having a constraint that may bring into question the suitability of the site.***
- ***Planning Policy Statement (PPS) 25 states that 'more vulnerable' uses (including residential) are acceptable in Flood Risk Zone 1, therefore a site that is considered in Flood Risk Zone 1 will be considered as unconstrained.***

**Nature Conservation Designations:** Future conservation designations will be assessed against the following criteria:

- ***Any site that is adjacent to or within 500metres of the curtilage of a national or regional designated nature site (National Nature Reserve, Local Nature Reserve and County Geological Site) will be considered to have a constraint that may bring into question the suitability of the site.***
- ***Any site that is more than 500m outside of a national or regionally designated nature site will be considered as unconstrained.***

**Contaminated Areas:** In the borough, particularly in Great Yarmouth and Gorleston, there are areas of potentially contaminated land which may require site remediation or decontamination to enable residential development. The council has identified on its GIS system areas that are potentially contaminated.

Potentially contaminated areas will be assessed against the following criteria:

- ***Where a site is identified as being potentially contaminated, the site will be considered as constrained which will bring in to question the suitability of the site.***
- ***Sites identified as not potentially contaminated will be considered as unconstrained.***

**Hazardous Areas:** The Health and Safety Executive (HSE) keep a record of sites where hazardous or explosive materials are stored, or, where major pipelines are laid in England and Wales. Each site recorded by the HSE is classified with a major hazard or major pipeline consent and attributed with a consultation buffer zone that is dependant upon the size and potential hazard of the installation. It is the responsibility of a Local Planning Authority to consult the HSE if any planning permission lies within the consultation buffer zone to establish its implications.

When responding to the consultation, the HSE requires the Local Planning Authority to use an online toolkit called 'Planning Advice for Development near Hazardous

Installations' (PADHI+) to assess the sensitivity of a planning application and assess whether it is appropriately located in/or near a registered hazardous installation.

Where a planning application has been worked through the toolkit, it will have two final outcomes, either advise against (AA) or do not advise against (DAA).

In Great Yarmouth there are a number of hazardous and explosive sites due to the amount of port operational land, and there is also a high pressure gas pipeline that runs from the Power Station in South Denes to Bacton in North Norfolk.

There are two major hazardous installations in Great Yarmouth, Bunn's Factory along Southtown Road and Bunn's Harbour Plan Storage along South Denes. These two sites have a buffer consultation distance of 600m and 400m respectively. Other hazardous installations in Great Yarmouth have varied consultation zones, however none exceed 250m.

For the purposes of the Assessment, it will be considered that any site within 250m of the major pipeline or hazardous installation, other than the two owned by Bunn's will be applied to the PADHI+ toolkit and suitability assessed. The sensitivity of each site will be ascertained by calculating its potential yield from Stage 6.

For sites that may be affected by the hazardous installations owned by Bunn's, any site that is within 600m of the installation along Southtown Road, or 400m of the installation in South Denes will be assessed as previously explained.

It is considered that if a site has been advised against development (**AA**), this will not necessarily exclude the site from having development potential. This is because where a hazardous installation is constraining the development of the site, it may be possible to remove or relocate the hazardous installation, therefore annulling the toolkit's advisory recommendations. Such a judgement will be made further in the assessment.

Therefore, sites potentially affected by any hazardous installations will be assessed against the following criteria:

- ***If a site is within 250m of any Major Hazardous Installation or Major Pipeline route, or within 600m of the Bunn's Factory along Southtown Road, or 400m of the Bunn's Plant Storage Warehouse on South Denes, it will be taken through the HSE's PADHI+ determination system whereby the following may apply:***
  - ***The site will be determined as Do Not Advise Against (DAA)***
  - ***The site will be determined as Advise Against (AA)***
- ***Where a site has been advised as DAA, the site will be considered as unconstrained.***
- ***Where a site has been advised as AA, the site will be considered as having a constraint that may bring to question the suitability of the site.***
- ***If a site is not within 250m of any Major Hazardous Installation or Major Pipeline the site will be considered as unconstrained.***

## **2.63 Potential Impacts**

**Visual Landscape:** The borough has important landscapes which include the sensitive landscape of the Broads and the Area of Outstanding Natural Beauty at Winterton-on-Sea and Somerton. There are also areas of open countryside between settlements that are important in maintaining their separation.

To assess the potential impacts on the visual landscape, the following criteria will be applied:

- ***Where a site is within the defined boundaries of the Norfolk Coast Area of Outstanding Natural Beauty (AONB), this will be considered as a constraint that is unlikely to be overcome. In this instance, the site will be attributed as wholly constrained.***
- ***Where a site is considered to be part of Local Plan Policies NNV2: Landscape Important to the Broadland Scene, NNV3: Landscape Important to the Coastal Scene or NNV5: Landscape Important to the Setting of Settlements, the site will be considered as constrained that may bring into question the suitability of the site.***
- ***Where a site is considered to be part of the remainder of the countryside, or has no Local Plan landscape policy, the site will be considered as unconstrained and may favourably enhance the suitability of the site.***

**Heritage:** Preserving or enhancing the aesthetic quality of the built environment is supported by national guidance. Development that would cause harm to the structure, aesthetic quality or character would not be acceptable in planning terms.

Great Yarmouth has an extensive list of listed buildings, scheduled ancient monuments and conservation areas that are important to the built heritage in the borough. To ensure that the borough's heritage is underpinned, development will need to respect the built environment.

To assess the potential impact on the borough's built heritage, the following criteria will be applied:

- ***Where development of a site may be detrimental to the setting of a Scheduled Ancient Monument, Grade I & II\* building, it will be considered as a constraint that is unlikely to be overcome. Therefore, the site will be assessed as being wholly constrained.***
- ***Where a site is within a Conservation Area or adjacent to the setting of a Grade II building, the site will be considered as having a constraint that may bring into question the suitability of the site.***
- ***Where a site has no relation to any built environment designations, the site will be considered as unconstrained.***

## **2.64 Physical Qualities of the Site**

**Access to site:** An assessment of on-site and off-site access provision is an important determinate of whether or not a site could be suitable for development. Where sites have inadequate on-site access, i.e. landlocked or unable to widen access roads due to adjacent properties; or inadequate off-site access, i.e. no remaining capacity in the highway network, the cost involved to overcome the constraints may often have no upper ceiling or may be unachievable outright.

To determine suitable on-site and off-site access, Norfolk County Council, as the Highways Authority, were consulted on all sites. The consultation determined the level of existing access, the potential for new access or mitigation measures and any approximate highway improvement costs.

To quantify the consultation results, the following criteria are used to assess the level of access to a site:

- **If the Highways Authority concludes that suitable on-site access cannot be established, it will be considered as a constraint that is unlikely to be overcome. Therefore the site will be assessed as wholly constrained.**
- **Any other additional comments from the Highways Authority will be considered and absorbed into the overall access assessment for each site – any highway improvement costs will be factored into the viability assessment.**

**Access to Facilities:** Planning Policy Statement 3: Housing identifies the importance of locating residential development where there is access to key services and facilities to limit excessive travelling.

The East of England Plan identifies a list of key services and facilities that must be accessible to help local planning authorities determine which settlements to designate as Key Service Centres, these are:

- Access to a primary school, or a secondary school in a settlement or easily accessible by public transport
- Primary healthcare facilities
- Range of shops to meet day to day needs
- Local employment opportunities
- Frequent public transport to higher order settlements.

Healthcare facilities and local shops are considered to be part of the day to day range of facilities that a household may need to use, therefore these will be used as part of the qualifying criteria. Access to employment was discounted however, as people tend to generally travel further to their place of work.

For the purposes of the assessment, the following settlements have been regarded as having a range of shops and services (equating to food stores that meet most weekly shopping needs and provide an element of choice, together with non-food outlets, a post office and a pub):

- Belton with Browston
- Bradwell
- Caister-on-Sea
- Filby
- Gorleston
- Great Yarmouth
- Hemsby
- Hopton-on-Sea
- Martham
- Winterton-on-Sea

Where sites are located in or adjacent to these settlements, they will be regarded as having suitable access to a range of shops and services.

All principle settlements in the Borough have access to a primary school, therefore using primary schools as qualifying criteria may unfairly promote sites in unsustainable locations as being potentially suitable.

For the purposes of the assessment, the accessibility to secondary schools will be used as the qualifying criteria. It is considered that the following settlements are regarded as having access to secondary education, either within the village, or can be reached easily by foot or cycle (a distance of less than 5km along a route that is suitable for cycling):

- Bradwell
- Caister-on-Sea
- Gorleston
- Great Yarmouth
- Martham

Where sites are located in or adjacent to these settlements, it will be regarded as having suitable access to a secondary school.

Having access to primary healthcare facilities such as GP surgeries is important to help create sustainable communities. There are a number of GP surgeries within the borough and it is considered that where a site is located within 800metres of a GP surgery, the site will be regarded as having suitable access to healthcare facilities.

To wholly assess the accessibility of facilities for each site (a range of shops and services, a GP surgery and a secondary school) the following criteria will be applied:

- ***If a site is considered to have access to at least two facilities, the site will be regarded as having good access to a range of facilities and potentially suitable for residential development.***
- ***If a site has access to one facility, the site will be regarded as having poor access to a range of facilities and potentially constrained that may bring into question the suitability of the site.***
- ***If the site does not have access to any facilities, the site will be considered as being unsustainable and will be severely constrained.***

## **Water and sewerage infrastructure**

In assessing sites consideration will need to be given to the water supply and wastewater treatment capacity. A joint Water Cycle Scoping Report was undertaken for Great Yarmouth and Waveney Council's (March 2009) to broadly assess the water supply and wastewater treatment capacity. The report includes a baseline assessment for water resources, abstraction & discharge consents and wastewater treatment capacity for the principle settlements. In addition a broad appraisal of capacity by Anglian Water, generally at settlement level, will be used to inform the Assessment as well as any additional information from URC evidence bases studies.

When determining the water supply and wastewater treatment capacity, the following criteria apply:

- ***If no capacity is available and infrastructure upgrades are not possible a site will be considered to be severely constrained which will bring in question the achievability and suitability of the site.***
- ***If there is limited capacity available and infrastructure improvements are required the site will be considered as constrained but will not necessarily question the achievability and suitability of the site.***
- ***A site will be considered as unconstrained if there is adequate capacity.***

**Table 4 Suitability Assessment framework**

<b>Criteria</b>	<b>Column A</b> “constrained to a degree to not be overcome” (site is constrained and will not be viability assessed)	<b>Column B</b> The constraint is relevant to the site and may bring into question the suitability, availability or achievability of the site (viability tested)	<b>Column C</b> The site is unconstrained, and/or, the suitability, availability or achievability of the site is favourably enhanced (viability tested)
<b>Restrictions</b>			
Flood Risk	n/a	Flood Risk Zone 2+3a	Flood Risk Zone 1
Nature Conservation Designations	n/a	Adjacent to or within 500m of NNR, LNR and CGS	Outside 500m of NNR, LNR and CGS
Contamination	n/a	Potentially contaminated	No known contamination
Hazardous Area	n/a	Site is within 250m of hazardous installation and considered as <b>AA</b> .	Site is within 250m of hazardous installation but is considered as <b>DAA</b> , or, the site is outside of 250m of any hazardous installation.
<b>Potential Impacts</b>			
Visual Landscape	In Area of Outstanding Natural Beauty	Local Plan Policies NNV2, NNV3, NNV5	Local Plan Policy NNV7 or none
Heritage	Detrimental to setting of Scheduled Ancient Monument, Grade I & II* built environment designations	Within Conservation Area or adjacent to setting of Grade II built environment designations.	No Conservation Area or built environment designations.
<b>Physical Qualities of the site</b>			
Access to Site	No suitable on-site access	NCC consultation advisory notes	NCC consultation advisory notes
Access to Facilities	n/a	Access to none/one facility	Access to two or more facilities
Waste water infrastructure (sewage capacity and supply capacity)	n/a	No Available capacity/infrastructure needed	Available capacity

## **2.65 Stage 7b Assessing the Availability for Housing**

The SHLAA Practice Guidance illustrated that an available site can be realised as a site if it is controlled by a housing developer who has expressed an intention to develop, or the land owner has expressed an intention to sell.

To enable an assessment of availability, it is considered that the above definition can be put forward as two assessment criteria: assessing the ownership of the site, and the intention to develop.

**Ownership:** The ownership of a site should be clarified to determine the availability of a site. Where a site is in multiple ownerships, potential problems with site assembly and each owners' varied development intentions can lead to disputes and slow down the rate in which the site could be brought forward to be developed.

For the purpose of the assessment, the following criteria will be applied:

- ***Where a site is in single ownership or is Council owned, the site will be considered as unconstrained and may contribute towards the availability of the site.***
- ***Where a site is in multiple ownerships, the site will be considered as constrained and may affect the availability of the site.***

**Intentions to Develop:** An intention to develop a site will be the clearest indication as to whether a site is potentially available or not. Any site can be put forward as an expression of interest, however without an intention to develop from the landowner, development will not happen.

For the purpose of the assessment, the following criteria will be applied:

- ***Where a site has been put forward as an expression of interest for residential development by a landowner, agent or housebuilder, the site will be considered as having intentions to develop and may contribute towards the availability of the site.***
- ***Where a site has not been submitted as an expression of interest or the intentions to develop from the owner cannot be established, the site will be considered as unavailable for development – until such a time as the intentions to develop from the landowner can be established.***

It is important to recognise that when determining the availability of a site, both factors above should be taken into consideration and explored in combination with each other to ascertain the general availability of each site.

For example, a site in multiple ownerships would not necessarily be constrained and unavailable if all related owners were collaborating through an agent or house builder and had intentions to develop. This is opposed to a site in single ownership that would not be available for development if the intentions to develop could not be established.

## **2.66 Stage 7c/d Assessing the achievability for Housing/Overcoming Constraints**

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.

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:** Viability is a complex issue that is based upon assumptions and variables that can be difficult to predict. This includes the price at which the land can be purchased from the landowner, the realistic value that is likely to be extracted from a completed site, construction costs and any additional costs the developer would be obligated to pay the Local Planning Authority, i.e. section 106 agreements.

Additionally, a number of 'abnormal' costs, i.e. those that are not considered as standard development costs such as remediating contaminated land, where applicable, would be included in the viability assessment.

Combining the above information to assess the achievability of a site, a model has been produced in conjunction with a housing developer and the Council's Property Department. The model works in a similar fashion to a residual land valuation, however given the complexity and costs involved, the model is at a much broader level which is appropriate for this level of strategic assessment.

The main assumption behind the model is how to gauge average land values across the borough in order to give an indication as to what residual land values would be considered as viable without abnormal costs, which would then need to be taken into account.

It was considered that a number of residual land valuations, undertaken by developers and subsequent land purchases could be an approximate marker to gauge average land values. However, due to the economic downturn, it would be unrealistic to use information that predated July 2007. Therefore, using the best information available (post 2008), different average land values have been calculated for different areas across the borough.

**Assessing the Achievability of Sites:** In practice, each site, once assessed on its suitability and availability will be considered through the viability assessment to ascertain whether it is viable (achievable). If any constraints are identified that are considered to be insurmountable, the site will be excluded from the viability assessment and considered as 'not currently developable'.

The viability assessment will take into consideration any actions that would be needed to overcome any 'abnormal' costs identified in the Assessment, and if the final value (the price left to purchase the site) is on a par with average land values applicable to that settlement, the site will be considered as viable.

**Delivery of Sites:** 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.

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

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.

## **2.7 Stage 8: Reviewing the Assessment**

It is important that the SHLAA methodology retains some flexibility in its approach in light of insufficient sites being available for development. Therefore, an overall risk assessment will be made as to whether site will come forward as anticipated.

If the final Assessment report concludes that there is a shortfall of sites available for development, it will be necessary to review the Assessment and give consideration to widening the site survey parameters at Stage 4, and/or reviewing the assessment of suitability, availability and achievability at Stage 7 to give weight to identifying broad locations, or potential windfall sites. This will be monitored through the LDF Annual Monitoring Report (AMR).

## **2.8 Stage 9: Identifying and assessing the housing potential of broad locations (where necessary)**

If the Assessment requires the identification of broad locations where specific sites cannot be identified, the Assessment will consider additional sites that are either:

- Within and adjoining settlements
- Outside settlements i.e. major urban extensions or additional growth areas.

The Assessment will identify such sites by widening the survey parameters applied at Stage 4 of the Assessment so that sites outside settlement development limits, previously considered as unsustainable, will be re-appraised and factored into the Assessment.

Where broad locations are identified, the estimates of housing supply will be developed by having regard to:

- Any evidence underpinning the East of England Plan
- The nature and scale of potential opportunities within the broad location
- Any market conditions.

## **2.9 Stage 10: Determining the housing potential of windfall (where justified)**

Planning Policy Statement 3: Housing sets a clear expectation that housing supply should be based upon specific sites, and where necessary broad locations. Windfalls are brownfield sites that come forward unexpectedly but are not specifically identified as available in the planning process. They therefore cannot be relied upon.

PPS 3 indicates the allowances for windfalls should not be included in the first 10 years of land supply unless Local Planning Authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified.<sup>12</sup>

It is not considered that the Core Strategy will rely upon windfall developments to deliver its housing targets. However if the Assessment identifies a shortfall of available sites, it is considered that a number of sites are likely to come forward for housing which have not been identified as available in the Assessment, although little weight should be given to this assumption.

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<sup>12</sup> Para 59. Planning Policy Statement 3: Housing (2006) DCLG  
Great Yarmouth Borough Council Strategic Housing Land Availability Assessment  
(March 2010)

## **3.0 Appendices**

### **Appendix A: Consultees**

The following organisations have been consulted on this methodology:

#### ***Public Sector***

Go-East  
East of England Regional Assembly  
East of England Development Agency  
Norfolk County Council  
Waveney District Council  
North Norfolk District Council  
Broadland District Council  
South Norfolk District Council  
Breckland Council  
The Broads Authority  
Norfolk Primary Care Trust  
Norfolk Police Authority  
The Highways Agency  
Natural England  
English Heritage  
Environment Agency  
National Grid  
BT

#### ***Local House Builders/Developer interests/Other Interests:***

1<sup>st</sup> East  
Acourus Rural Properties  
Aldreds Chartered Surveyors  
Anglia Water  
Badger Building  
Barratt Homes  
Barton Wilmore  
Bidwells  
Bloor Homes  
Bovis Homes Ltd Eastern Region  
Broadlands HA  
Brown & Co  
Cripps Developments LTD  
De Pol Associates  
Defence Estates  
Evans Chartered Planning Consultancy  
Essex and Suffolk Water  
George Wimpey East Anglia – Taylor Wimpey  
Hayes Affordable Homes LTD  
Home Builders Federation  
Hopkins Homes  
Howards Estate Agents  
Iceni Developments Limited  
Keys Professional Services  
Land and New Homes  
Level  
McCarthy and Stone  
Nathaniel Lichfield and Partners  
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Norfolk Homes Limited  
NPS Property Consultants  
NWA Planning Group  
Paul Robinson Partnership  
Pegasus Planning Group  
Persimmon Homes  
Planning Solutions  
Reedling Consultants  
Savills  
Strutt and Parker  
Tetlow King

***Strategic Housing Land Availability Assessment Working Party***

Edward Gilder, Badger Building  
Eric Cooper, Highways Agency  
Helen Ward, Natural England  
Jo Hardwick, Environment Agency  
John Long, Bidwells  
Mark Duffield, Aldreds  
Richard Drake, Norfolk County Council

**Appendix B: Urban Density Ranges**

For Great Yarmouth and Gorleston urban density ranges, see attached documents on website.

## **Appendix C: Working Party Responses on Refining Methodology**

<b>Working Party 1: Determining the Sources of Sites</b>	
<b>Sites designated in the URC Area Action Plan as brownfield sites should be included as a source of possible sites. If not, suggestions as to why this would be inappropriate.</b>	
John Long, Bidwells Planning	I agree that it is sensible that sites in the URC are identified for development. However, they will also need to be subject to the suitability, availability and deliverability testing. It cannot be assumed that a site in the URC will automatically be delivered.
Mark Duffield, Aldreds Planning	This is the big question. It is my belief those areas are historically for commerce and could be re-developed as such. The continued desire to develop these areas much of which are flood risked with residential flat development on an unprecedented scale is not only a bit nonsensical (even if you can get passed the environmental agency issues) why would you want more people to live at risk but also presuppose a market for such use which in itself is very speculative. So the answer is bring back the commercial into those areas and expect residential in traditional form on the up lands of Bradwell and Gorleston
Richard Drake, Norfolk County Council	Sites in the URC area action plan should be included but in the suitability assessment criteria will need to assess the particular viability and constraints of this area.
Jo Hardwick, Environment Agency	We support the inclusion of the URC AAP as a source of possible sites. Some of these sites <i>maybe</i> unsuitable (e.g. due to flood risk, contamination, etc) but we will be able to advise you of this in later stages of the study.
Edward Gilder, Badger Building	Such sites should only be included if they are unconstrained and genuinely capable of delivering development or capable of having the constraint removed by investment which still leaves the site viable - otherwise they won't meet the PPS 3 criteria for availability
<b>The Council will review sites that have been refused planning permission in the past 5 years on the grounds that the site is: a particular minimum size? within or adjacent to settlements? both? Any other suggestions?</b>	
John Long, Bidwells Planning	The SHLAA should probably be looking at sites within and adjacent settlement in any case. It should make a policy neutral consideration of all possible site options in all settlements where growth could be proposed in the Core Strategy – not necessarily those settlements in identified in the top levels of the existing settlement hierarchy, as there may be changes to the settlement hierarchy as the Core Strategy develops – through representations. The planning application process will be a useful

	indicator of the suitability and delivery of sites.
Mark Duffield, Aldreds Planning	It is surprising that the council have stopped the Claydon School project for so long on a area road network basis. Whilst review of those sites that have been the subjects of an application it should not stop a proper review of those peripheral sites that have been put forward under the plan process. There are many sites in all settlements that would make a useful contribution to the housing need. Brown field sites should include redundant holiday venues. There is a need to reduce capacity and encourage modern development in the holiday industry. For instance The Hermanus at Winterton is too small and despite lots of investment should be allowed to go to permanent residential which is more in keeping with that central part of the community. The Hemsby site (Pontins) should be considered for part residential development with high quality holiday on the remainder or a large s.106 payment to facilitate the upgrading of the whole holiday village
Richard Drake, Norfolk County Council	Thresholds in accordance with Table 3 of the methodology would seem appropriate; removing the smallest sites while retaining a mix of sites to appeal to different sizes of developer. The only Greenfield sites not within or adjacent to settlements which should be considered are those whose scale would be large enough to fund all necessary infrastructure, and could meet the criteria of the suitability assessment. The scale of such settlements would typically be at least 3,500 dwellings.
Jo Hardwick, Environment Agency	We have no objections to this approach.
Edward Gilder, Badger Building	This seems a sensible proposition – a minimum size threshold of 10 in the first instance would seem reasonable to save a lot of unnecessary work. Sites need to be adjoining settlements or capable of being joined by limited infill as part of any proposed allocation to justify consideration.
<b>Additional Comments</b>	
Mark Duffield, Aldreds Planning	The attempts by the URC to kick start the development of the brown filed sites is laudable. Great Yarmouth's topography is different to Lowestoft and the future sea related use uses seem to have been determined by current events. Waterside apartment development is more suited to Lowestoft and commercial uses in Great Yarmouth waterside should be encouraged by new business parks there
Richard Drake, Norfolk County Council	Some sites within the URC will only be suitable for housing if and when some uses which have a COMAH designation have relocated.

**Working Party 2:  
Reviewing the Evidence Base and Determining which Sources  
of Sites should be Surveyed**

**Other information that could be included in the desktop review, or, that could be used to inform the deliverability of sites at the testing stage of the assessment.**

John Long, Bidwells Planning	<p>The Breckland SHLAA testing model was developed in consultation with developers and agents and is a useful reference point.</p> <p>The SQL report on Great Yarmouth and Lowestoft (<a href="http://www.eera.gov.uk/publications-and-resources/studies/geographical-studies/great-yarmouth-and-lowestoft">http://www.eera.gov.uk/publications-and-resources/studies/geographical-studies/great-yarmouth-and-lowestoft</a>) had some regard for strategic growth locations around Great Yarmouth.</p>
Richard Drake, County Council	The information included seems appropriate to use as part of a desktop review prior to survey.
Edward Gilder, Badger Building	<p>I think there remains an issue around flood risk. The response by the Inspector and the EA in Lowestoft seems to be that there may be a solution which can be tested at the application stage. There remains some lack of clarity about safe means of escape and the problem of new developments ending up as islands or how vehicular access can be achieved for example to some of the allocations on Southtown Road. If these issues are not pinned down with a degree of certainty very early on then you are left with a plan based on allocations which are excessively expensive to build or which will be the subject of detailed objection by the environment agency. Our experience tells us that their standards become more onerous year on year and what appears to satisfy them in principle often does not get their final approval when an application is made. Given the lack of higher ground around any of the LDF allocations likely to be made in the URC area this is a real concern.</p>
Jo Hardwick, Environment Agency	<p>We agree that the list of resources is adequate. With regards to informing the deliverability of the sites, the following environmental criteria must be a consideration:</p> <ul style="list-style-type: none"> <li>- flood risk</li> <li>- contaminated land and risk to controlled waters</li> <li>- ecology/ designated sites</li> <li>- water quality: sewage infrastructure and network</li> </ul> <p>water resources/ supply</p>
Helen Ward, Natural England	Refer to Natural England website for citations for SSSIs and to the JNCC website for European designation citations.

Eric Cooper, Highways Agency	Possibly consider the output/outcomes of the Great Yarmouth Transport Strategy. This could identify showstoppers/issues that may be of interest to the SHLAA
<b>What minimum site size thresholds would be appropriate to consider sites that are strategically important yet, reflect the different densities that would be achieved in rural and urban areas?</b>	
John Long, Bidwells Planning	<p>Depends upon what the likely nature of the housing supply is going to be. The SHLAA will need to demonstrate that the Core Strategy approach to housing delivery can be delivered (i.e. that there are sufficient (unconstrained and available) options for sites to meet the suggested distribution of growth).</p> <p>It may be appropriate to have different thresholds in the urban and rural areas and possibly different thresholds within the urban areas.</p> <p>If in rural areas the supply will come from small sites of say 5 houses and above (at an average of 30 dw. Per hectare – assuming that this is going to be the minimum density – and that evidence shows it can be achieved), then it would be appropriate to consider such sites in the SHLAA – i.e. 0.2 hectare. If it is to be mostly derived from sites of 10 houses or above, then assuming a density of 30 dph the threshold will be close to 0.5 hectare.</p> <p>If in the urban areas the likely supply of sites will mostly come from sites capable of 10 or more houses, then these are the sites that ought to be considered. In terms of density – it may be appropriate to have a range of thresholds in urban areas (i.e. town centre/waterfront sites – i.e. areas likely to be accommodating townhouses, apartments and flats may be assumed at delivering units at a higher density than suburban sites, and therefore may be appropriate to consider a lower site threshold.</p> <p>The important consideration is not to over estimate the likely development densities (particularly if there is uncertainty in terms of the market for high density schemes), the character of surrounding areas is a useful guide as is recent permissions.</p> <p>In terms of truly strategic sites, they are by their nature large. I suspect that there will not be very many sites that meet this definition. They are likely to be the sites that can deliver the key</p>

	aspects of the Core Strategy growth distribution – i.e. to Deliver key parts of the URC AAP, sustainable urban extension(s) and key site(s) in growth villages. For employment sites, 10 hectares and greater has in the past been considered strategic.
Richard Drake, County Council	The thresholds that are currently identified seem appropriate; a large number of small urban sites at relatively high densities could provide a significant amount of housing. Advice from the Government Office indicates that small sites previously seen as windfall should be captured through the SHLAA evidence gathering.
Edward Gilder, Badger Building	Strategically important sites in an urban area could have a threshold of 15 to match that of the affordable housing requirement in pps 3 if only for some form of consistency. In the rural area will you be making any allocations of that size other than in the larger villages where it also appears to be a reasonable threshold
Eric Cooper, Highways Agency	From the Highways Agency's perspective, size/threshold is not the issue. If a transport corridor is at capacity then just one small site may be one too many. I would have thought that an initial view is taken of how many additional trips could be accommodated on the highway network and is there anywhere which additional trips are not appropriate. Of the locations where there is capacity (or capacity at a reasonable level of intervention) inversely determine the likely number of dwellings that could be accommodated and then the number of sites would flow from this.
<b>It is justified that sites on or adjacent to SSSIs, SPAs and SACs will be excluded from the assessment?</b>	
John Long, Bidwells Planning	It seems appropriate to exclude sites on designations, particularly where they are recently designated or recently surveyed. However, in terms of sites adjacent to designation it depends on the reasons for the designation and the potential impact of development upon the habitat. It may be possible to develop next to designated sites without impacting upon them, or where acceptable mitigation measures can be put in place.
Richard Drake, Norfolk County Council	Yes, it is justified due to the danger of direct loss of habitat or unacceptable impacts on the ecology.
Edward Gilder, Badger Building	No being adjacent to these sites should not automatically exclude them from development. But the notion that it should brings in to sharp focus the rational behind housing and leisure development in an area of flood risk in the Bure Loop!!!!

Eric Cooper, Highways Agency	Not really a Highways Agency issue, but the feeling is exclusion depends on the sensitivity of the site and what is needed to protect it from adjacent development determines if a site can be located adjacent.
Jo Hardwick, Environment Agency	Support
Helen Ward, Natural England	Yes. It would contravene national policy and legislation to include them. In addition, given the local authority's responsibilities under the <i>Local Government and Public Involvement in Health Act (2007)</i> to achieve targets in positive conservation management of County Wildlife Sites (National Indicator 197), we would suggest that sites on CWS also be excluded from the assessment.
<b>(Natural England Only) If justified, what level of buffering would be adequate to ensure that the integrity of SSSIs, SPAs and SACs are not affected by adjacent development?</b>	
Helen Ward, Natural England	For sites where the impacts are likely to be hydrological – i.e. in relation to water quality and availability, a distance buffer is inappropriate. Buffering needs to take account of the whole catchment, so will need to be advised on a site by site basis. It would also be inappropriate to use a physical measurement for mitigating recreational disturbance. Because of the unique character of the Broads, visitors will come to the area from outside the authority's boundaries, but the authority should recognise that its contribution to housing growth in the region – and the cumulative impacts on designated sites - needs to be looked at in combination with all additional housing, so should take a more strategic approach to developing green infrastructure as mitigation for any anticipated disturbance. NB This list should include Ramsars as well, as they are offered the same level of protection.
John Long, Bidwells Planning	Hopefully, natural England will not apply a standard buffer without considering the nature of the designation and the potential for it to be impacted upon by development.
<b>Additional Comments</b>	
Eric Cooper, Highways Agency	Transport Evidence is key to understanding the Core Strategy. It is noted that in the current consultation on the core strategy, there is no background study on transport as part of the evidence base.
Jo Hardwick, Environment Agency	<ul style="list-style-type: none"> <li>We note that you consider flood risk can be mitigated against and therefore these sites will not be excluded/ filtered out at this stage. You should have regard to table D.3 of PPS 25 which sets out where development would be</li> </ul>

	<p>inappropriate in a flood risk area. Residential developments (which is classified as 'more vulnerable') are not suitable in current FZ3b – these sites should therefore be discounted. Your SFRA will inform this.</p> <ul style="list-style-type: none"> <li>• Whilst flood risk can be mitigated, the Sequential Test must first be considered. Safe access/ egress must also be available for the site.</li> <li>• We note that the general consensus was that contaminated land can also be mitigated. This is correct and we encourage it in most situations. However, you must be mindful that this can be costly and in some cases remediation is not possible.</li> <li>• You should also have regard to water quality as a potential constraint to development. This will be informed by your Water Cycle Strategy which we understand to be at the Scoping stage. We have been made aware of problems with the sewage network in Hemsby and Ormesby, especially in periods of heavy rainfall.</li> <li>• Water availability is likely to be an issue around 2020 based on Essex and Suffolk Waters (ESW) figures. This is therefore unlikely to be a constraint in the short term but must form a consideration. This date is subject to potential change depending upon work currently being done by ourselves, ESW and Natural England to determine the impact of abstractions on designated areas.</li> </ul>
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**Working Party 3:  
Carrying out the Survey and Estimating the Housing Potential**

**Alongside standard survey criteria in the SHLAA Practice Guidance the SHLAA will also: retain flood risk/coastal erosion/contaminated land/landscape and conservation details and infrastructure/access to services – limitation survey criterion; and remove additional planning policy/history survey criteria.**

<p>John Long, Bidwells Planning</p>	<p>a) I Agree that it is useful to continue collect potential constraint information at this stage of the SHLAA. It can be used in assessing delivery of sites. In particular, mitigating the constraint issues will need to be done on a site by site basis. i.e. in some cases, sites by there size, nature, and/or location be more capable than others in mitigating such issues. However, it is important that the information is not used to discount sites before the delivery testing stage is reached.</p>
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	b) I agree that it is appropriate to remove the additional planning policy / history criteria, to ensure the SHLAA remains policy neutral
Richard Drake, Norfolk County Council	Agree
Edward Gilder, Badger Building	The more information you can take in to account at the earliest possible stage the better. Have you discussed with Waveney how they carried out this process and what lessons you can learn from them. I understand for example that a preferred site for industry at Halesworth was reliant on the removal of overhead lines and them being placed underground. Subsequent investigations have shown that the cost of this work exceeds the open market value of the site. It is easy for constraints such as these to derail proposed allocations late in the day.
Jo Hardwick, Environment Agency	<p>We support the retention of flood risk, coastal erosion, contaminated land, landscape and conservation details, infrastructure and access to services within the SHLAA survey criteria. These are key issues for your Borough and need to be highlighted at an early stage. As acknowledged within the discussion sheet, these factors will not necessarily discount sites but raises them as potential issues to be considered at the testing stage with regard to the suitability and deliverability of the sites.</p> <p>Planning policy and history will be important for the study. For example, many sites which have been through the planning process have been supported by site specific FRAs which provide more information on the nature of flood risk that will be valuable in the testing stages. Furthermore policy may prevent some sites being appropriate, e.g. more vulnerable development in FZ3b. If you consider it would be more appropriate to include these issues at the testing stage then we would have no objections to the approach.</p>
<b>Do you agree that the range of densities and different densities tiers are justified: Town Centre 65dph; Waterfront areas (URC) 65dph+/-; Edge of Centre 50dph; Edge of Town 40dph; Outside of town/within village limits 30dph?</b>	
John Long, Bidwells Planning	Developers/estate agents on the group will be best placed to answer questions on the

	<p>delivery and viability of schemes at different densities.</p> <p>However, my own view is that in the short to medium term at least, delivery of high density schemes at the 65 dph range are likely to be limited, even in waterfront locations. The market has changed significantly in the last year, and its effects may not be short lived. I suspect that the market for 'buy to let' apartments (i.e. the type that can derive the higher densities) will be somewhat stagnant beyond the short term. I suspect that there will still be a market for waterfront apartments but perhaps larger sized apartments. I would therefore suggest that 65 dph is on the high side in Town Centre and Waterfront areas.</p> <p>I also suggest that densities at Waterfront sites will be affected by the need to raise living accommodation out of the flood plain, giving over more ground/first storey space to ancillary/other uses (car parking/shops/retail etc). The same may be appropriate in Town Centre areas where ground floors may be given over to non-residential uses. I also note that the draft area action plan for the URC areas required lower density uses in some waterfront sites in the Gorleston Area.</p> <p>The densities suggested for other areas may also be optimistic, unless there is a view that the Council will develop a policy that requires minimum densities to be achieved at Edge of Centre/Edge of Town locations.</p> <p>I suggest densities at the range below may be more appropriate (these have been taken forward by Breckland Council)</p> <ul style="list-style-type: none"> <li>• <b>Town centre 55dph</b></li> <li>• <b>Waterfront areas (URC) 55dph+/-</b></li> <li>• <b>Edge of centre 45dph</b></li> <li>• <b>Edge of town 35dph</b></li> <li>• <b>Outside of town/Within village limits 30dph</b></li> </ul>
Richard Drake, Norfolk County Council	Agree
Edward Gilder, Badger Building	The analysis which we have carried out of densities in the URC area in lake Lothing shows them to be ridiculously optimistic. I

	<p>will forward a copy to you by email. To achieve the figures set out in the area action plan almost all the allocation has to be built as flats. The consequence of taking a more pragmatic approach will be that the URC will deliver less housing than anticipated and more green field land will need to be allocated to compensate. Have you done those sums yet?</p>
<p>Jo Hardwick, Environment Agency</p>	<p>We are not in a position to challenge the densities proposed for the different areas. However, we are particularly pleased to note the density of URC area is variable which will enable greater opportunities for environmental enhancements. For example, space for green infrastructure can be comprehensively designed into the areas which will also Make Space for Water, provide opportunities for innovative flood risk management, enhance biodiversity and create SuDS which will also assist in addressing your core strategy spatial vision and objectives for improved social and economic vitality.</p>
<p><b>Suggestions as to what additional multipliers could be used to ascertain net developable areas of sites and at what thresholds (site size/number of dwellings) would this be relevant?</b></p>	
<p>John Long, Bidwells Planning</p>	<p>a) multipliers</p> <p>I agree It is relevant to apply density multipliers to sites:</p> <p>Issues to consider as multiplier considerations:</p> <ul style="list-style-type: none"> <li>▪ extra flood risk mitigation</li> <li>▪ Other infrastructure – major roads</li> <li>▪ Open Space</li> <li>▪ Irregular sites</li> <li>▪ Impact of neighbouring uses (docks etc)</li> </ul> <p>b) thresholds</p> <p>The site size threshold will depend on what the likely supply of sites is going to be in the different areas. For instance, if the majority of dwellings in the urban area will come from sites capable of 10 or more dwellings, then this will be the appropriate threshold. Similarly if the supply of dwellings outside of the town/villages will be derived from sites capable of 5 or more dwellings then this will be the appropriate threshold. I suggest it may be appropriate to have different thresholds for different</p>

	broad locations.
Richard Drake, Norfolk County Council	<i>Illustrated table taken from Breckland SHLAA Methodology</i>
Edward Gilder, Badger Building	The application of these figures will make it almost impossible to deliver any 4 bed houses with gardens in the Borough. In the villages where form and character are to be taken in to account development at 30dpha will appear some what dense and alien. Any policy here needs also to include the PPS 3 references to form and character and there needs to be some lee-way downwards in those areas. This is more than compensated for by the majority of the allocations being on sites at over 40dpha.

#### **Working Party 4:**

#### **Assessing when and whether sites are likely to be developed?**

#### **Do you agree with the framework that has been proposed to assess the suitability and achievability of sites?**

John Long, Bidwells Planning	<p>Broadly agree, but as ever 'devil will be in the detail'. The issue of filtering out sites in 'particular areas' depends on what the 'particular areas' are. Similarly, the definition of a 'fundamental' constraint needs clarifying. Also, there needs to be clear definitions of what the different levels of constraint severity are. i.e. when does a constraint stop being 'moderate' and starts to be 'severe'. Is it cost related??</p> <p>It may also be appropriate to consider the scale of development as part of the consideration of the ability to overcome constraints. Larger sites may be more capable of overcoming constraints than smaller sites.</p> <p>I would suggest that you would need a clear audit trail of decision on those sites that are knocked out of the testing. In case, you are challenged at an examination.</p> <p>Also, you might need to think about cumulative impact of constraints. One constraint might not render a scheme unviable – but a series of them might.</p>
Jo Hardwick, Environment Agency	Agree

<b>Do you agree that the 'traffic light system' on the assessment framework is clear in assessing the severity of the constraint?</b>	
John Long, Bidwells Planning	See comments above about defining different levels of severity. Is the intention to give each issues a score i.e. between 1 to 10; or will it be an absolute "yes" or "no"
Jo Hardwick, Environment Agency	Yes, the traffic light systems will give a clear indication of the constraint. However, we may like to provide further comments on the criteria you use to assess the severity of the constraint. Taking flood risk as an example, it is unclear how the different zones, and hazards within the zones, would be rated within the three levels.
<b>Do you agree with the list of criterion to be used within the suitability and achievability framework to assess sites?</b>	
John Long, Bidwells Planning	The criteria need a greater explanation of what the judgements will entail. For instance, what is meant by "existing uses". An existing use on a site isn't necessarily a constraint. Most land has an existing use, whether it be farmland, garden land, employment land etc. Also, what is meant by potential effects on residents.
Jo Hardwick, Environment Agency	Yes. We are pleased to note that flood risk, ecology, contaminated land, water supply and foul sewage disposal. We assume that 'water connections foul' will relate to the impact of discharges as well as the infrastructure and network constraints.
<b>Are there additional criteria which can provide judgement as to whether a site can be considered deliverable or developable?</b>	
John Long, Bidwells Planning	Availability of public intervention (CPO; funding etc).
Jo Hardwick, Environment Agency	Yes. As with above, we consider the criteria is comprehensive and accounts for the main environmental constraints to housing development.