Strategic Housing Land Availability Assessment Review 2011

1 Foreword

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The Government requires Local Planning Authorities to assess the potential of land in their areas as part of a wider range of evidence to support future planning. The Strategic Housing Land Availability Assessment (SHLAA) is a theoretical exploration of the residential capacity of sites that landowners and agents have put forward in particular areas of Breckland. Government guidance expects these assessments to be 'policy neutral' where possible and as such, the Council has considered all of the towns and Local Service Centres in the District within the scope of the study to enable a more holistic view to be taken of land that could be made available. The SHLAA was first carried out in 2008 and this latest document updates the findings with any new sites that have been submitted to the Council since 2008 as well as updated constraints information.

It is important to stress that the SHLAA is purely a theoretical exercise and its findings do not circumvent the LDF Core Strategy, Site Specific Policies and Proposals and Area Action Plans which remain as the adopted planning framework of Breckland Council. Therefore, the LDF still remains the starting point for determining Planning Applications.

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Executive Member for Assets and Strategic Development

Introduction

Main Body

Appendices

2 Introduction

2.1 The Strategic Housing Land Availability Assessment (SHLAA) is a key piece of the evidence base upon which the Local Development Framework (LDF) will be based. This report has resulted from the work of the SHLAA Steering Group and takes into account the views expressed by key stakeholders as part of recent consultation.

2.2 The SHLAA report considers the market towns and Local Service Centres within Breckland and seeks to identify land with potential for residential development and assesses that potential. This is the first review of the SHLAA and the document responds to a number of key changes to national planning policy as well as reflecting the changes in land values since the first iteration of the study was produced.

2.3 When considering this report it is important to remember that its findings do not in themselves determine whether or not a site should be allocated for development through the LDF or granted Planning Permission for housing. Land will be allocated for development through the plan making process and will be subject to significant public consultation and scrutinised at an Examination in Public. Applications for planning permission will be determined by the Council based upon their own individual merits and having taken into account the policies of the Development Plan and all other material considerations. The results of this assessment will not prejudice any future decision of the Council on either of these matters.

3 Background

3.1 Planning Policy Statement 3 (PPS3) sets out the national planning policy framework for housing. PPS3 was published in November 2006 and replaced Planning Policy Guidance Note 3 (PPG3). PPS3 seeks to achieve a step-change in housing delivery through a more responsive and flexible supply of housing land. PPS3 requires Local Authorities to assess and demonstrate the extent to which existing plans fulfil the requirement to identify and maintain a rolling five-year supply of deliverable land for housing. In Breckland's case, this 5 year supply of housing land should meet the housing targets set out in the adopted Core Strategy. PPS3 requires this 5 year supply of land to be maintained over the plan period. In June 2010, the new Government made some amendments to PPS3 which change the definition of brownfield land to exclude residential gardens, as well as removing the national indicative minimum housing density. These all impact upon this review of the SHLAA.

3.2 In addition to the requirement to maintain a 5 year supply of land for housing, Local Planning Authorities should set out in their Local Development Documents (LDDs) policies and strategies that will allow the continuous delivery of housing, at the appropriate level, for at least 15 years. The appropriate level for Breckland will reflect the figures contained within the adopted Core Strategy. Drawing on information from the Strategic Housing Land Availability Assessment (SHLAA), Local Planning Authorities should identify sufficient specific **deliverable** sites to deliver housing in years 0-5, and **developable** sites in years 6-10 and where possible years 11-15. Where it is not possible to identify specific **developable** sites for years 11-15 then broad locations for future growth should be indicated.

3.3 The Council adopted its Core Strategy document in December 2009. Through this plan, Breckland has a housing target of 19,100 new homes over the period to 2026. At least 6,000 of the housing target will be accommodated in Thetford, which had previously been designated as a Key Centre for Development and Change through the East of England Plan (RSS).

3.4 Detailed practice guidance on Strategic Housing Land Availability Assessments was published in July 2007 and replaced the former process of Urban Capacity Studies. This fulfils the process and requirements of the practice guidance and incorporates Breckland Council's assessment of its five year assessment of housing land supply.

3.5 The Strategic Housing Land Availability Assessment will inform the preparation of the Local Development Framework Development Plan Documents.

4 Purpose of the Strategic Housing Land Availability Assessment

4.1 The purpose of the assessment as set out within PPS3: *Housing* and the practice guidance is set out below:

4.2 Annex C of PPS3 states that the key functions of a SHLAA are to:

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

4.3 The SHLAA guidance defines the purpose of the assessment as to:

- identify sites with potential for housing;
- assess their housing potential; and
- assess when they are likely to be developed.

4.4 It should be noted that although the assessment is an important evidence source to inform plan making, it does not in itself determine whether a site should be allocated or granted planning permission for housing development. Also, the study is not a one off assessment, and should be updated as an integral part of the Annual Monitoring Report process.

5 Key Outputs and Processes

5.1 The following sites out the key outputs and processes for the SHLAA:

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

Table 5.1 Strategic Housing Land Availability Assessment Core Outputs

1	The survey and SHLAA should involve key stakeholders including house builders, social landlords, local property agents and local communities. Other relevant agencies may include the Homes and Communities Agency (a requirement in areas where they are particularly active)
2	The methods, assumptions, judgements and findings should be discussed and agreed upon throughout the process in an open and transparent way and explained in the SHLAA report. The report should include an explanation as to why particular sites or areas have been excluded from the SHLAA.

Table 5.2 Strategic Housing Land Availability Assessment Process Checklist

5.2 The SHLAA should identify sufficient specific sites for at least the first 10 years of a plan, from the anticipated date of its adoption, and ideally for longer than the whole 15 year plan period. Where it is not possible to identify sufficient sites, it should provide the evidence base to support judgements around whether broad locations should be identified and/or whether there are genuine local circumstances that mean a windfall allowance may be justified in the first 10 years of the plan.

6 Existing Housing Land Supply

6.1 This section assesses the existing supply of housing in Breckland on the basis of sites current under construction and unimplemented planning permissions. This element of the assessment has been prepared following guidance from the Planning Inspectorate and Department for Communities and Local Government: *Demonstrating a 5 Year Supply of Deliverable Sites* (2007). This guidance is available to inspect at www.planning-inspectorate.gov.uk. Together with the results of the SHLAA this evidence will inform the Council's assessment of its five year supply of land for housing.

6.2 As all of the sites in this section are sites with planning permission they are considered to be suitable and available, as this test was made at the application stage. However, it is possible that not all sites will be achievable (built out) within the 5 year period. Therefore a further assessment has been made about the likely build out rates of the sites.

6.3 In order to test the achievability of large sites with planning permission (10 dwellings and above) a questionnaire was sent to applicants seeking their intentions for development on the site. Where the developer intentions were not available an estimation has been made based upon identified local trends.

6.4 As of 1st April 2011 there were in excess of 495 small-scale sites with planning permission. It is considered unfeasible to appraise the achievability of every small-scale site. Therefore, for small sites (under 25 dwellings) an average completion rate has been applied based on identified trends.

Breckland's Five Year Housing Requirement

6.5 The East of England Plan requires Breckland to deliver at least **15,200** dwellings over the plan period to 2021. This equates to **760** a year. Table 5.1 shows the housing requirement in detail. Between the financial year 2001/2002 and 2010/11, **6,120** dwellings have been completed in Breckland. This has created a shortfall of **829** dwellings. Therefore, over the remainder of the plan Breckland will have to deliver **946** dwellings per year. The five year housing requirement for the District is therefore **4,730** dwellings.

Year	Actual Completions	Required Completions	Shortfall/Surplus
2001/2002	543	760	-217
2002/2003	605	760	-155
2003/2004	884	760	124
2004/2005	840	760	80
2005/2006	592	760	-168
2006/2007	520	760	-240
2007/2008	625	760	-135
Adoption of the RSS (Previous shortfall has been removed and included within new required completions field)			
2008/2009	607	780	-173
2009/2010	528	780	-252
2010/2011	376	780	-404
Total since RSS adoption	**1511**	**2340**	**-829**
Requirement over remainder of plan		**946**	
2011/2012		946	
2012/2013		946	
2013/2014		946	
2014/2015		946	
2015/2016		946	

FIVE YEAR HOUSING REQUIREMENT	**4730**	

Table 6.1 Five Year Housing Requirement

Breckland Five Year Deliverable Housing Supply

6.6 As of 1st April 2011, **2,303** dwellings had the benefit of planning permission. In addition to this figure there were three large sites permissions (>=25 dwellings) for a total of **352** dwellings where the principle of development is accepted but is awaiting a Section 106 agreement.

6.7 It is expected that not all of these dwellings will be completed within the five year period of this assessment. As described above, identified sites with planning permission were split into two categories, large sites (10+ dwellings) and small sites (less than 10 dwellings).

6.8 **Table 6.2 'Expected delivery of housing on identified sites.'** shows the expected delivery of housing on identified sites.

	2011/12	2012/13	2013/14	2014/15	2015/16	Total
Large Sites	191	362	418	343	165	**1479**
Small Sites	243	237	0	0	0	**480**
SHLAA Sites (from 2008 SHLAA)	0	70	30	0	0	**100**
Total	**434**	**669**	**448**	**343**	**165**	**2059**
Requirement	946	946	946	946	946	4730
Shortfall/ Surplus	**-512**	**-277**	**-603**	**-603**	**-781**	**-2671**

Table 6.2 Expected delivery of housing on identified sites.

6.9 Based on the previous 9 years of completion data the total annual average completions on small scale sites are **243** dwellings a year. Breckland has an extremely low small-scale site permission lapse rate of 3%. As of the 1st April 2008, there were **495** dwellings with the benefit of planning permission on small-scale sites. Assuming 3% of these sites will lapse, it is likely that 480of these dwellings will be delivered over the plan period as shown in **Table 6.2 'Expected delivery of housing on identified sites.'.**

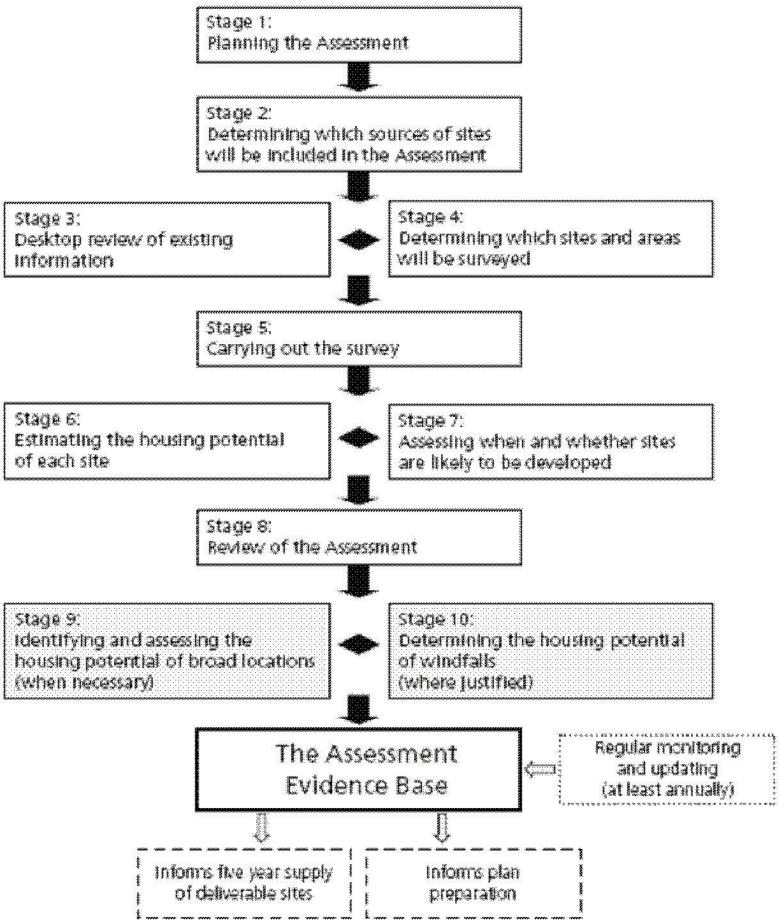
6.10 It is evident from the above table that the projected completions over the next 5 years are below the required completions. From **Table 6.2 'Expected delivery of housing on identified sites.'** it can be concluded that Breckland has a **2.18** year deliverable housing supply and is **2671** dwellings short of the 5 year target based purely upon sites which are either under construction or those that have an implementable planning permission.

6.11 The assessment in this section identifies that as of 1st April 2008 Breckland does not have a 5 year supply of deliverable sites for housing based upon sites that are under construction or with an implementable planning permission. However, it will also be important to consider the results of the SHLAA that will identify further areas of deliverable housing land, contributing to the 5 year requirement.

6.12 A combined statement of housing land supply incorporating a full assessment of the 5 year supply of housing is carried out in Chapter 8.

7 Methodology

7.1 The Government's SHLAA practice guidance sets out eight main stages to the assessment, with two further optional stages. These stages are illustrated below:



Picture 7.1

7.2 Breckland's SHLAA will adopt the basic structure that is proposed by the practice guidance. The details of each of these sections will be described below.

Stage 1: Planning the Assessment

7.3 The methodology that has been developed for Breckland's SHLAA has been through a number of stages. A first draft SHLAA methodology was produced and consulted upon in August 2007. A number of conclusions were drawn from the results of this consultation, the net result of which was that revisions to the methodology were

necessary. Revisions to this draft methodology began in January 2008 and the method set out in this section represents the results of these revisions to date. Appendix A contains a summary of the comments that were received as part of this initial consultation. This revised SHLAA seeks to retain the fundamental principles upon which the initial study was developed on but updated to take into account changes in national policy and the land and property market.

7.4 The practice guidance sets out that ideally the assessment will be carried out within the sub-regional housing market area. However whilst this is the preferred approach the guidance does not preclude an individual authority undertaking the assessment.

7.5 Breckland Council has the benefit of an adopted Core Strategy and Development Control Policies DPD . The other authorities within the Housing Market Area (HMA) are at different stages in the production of their respective LDFs, with one other authority, North Norfolk, having already had their Core Strategy DPD found sound at examination and the Borough of King's Lynn and West Norfolk shortly to adopt their Core Strategy Examination. Therefore in consultation it has been decided that a joint assessment will not be undertaken. As such, the geographical extent of this assessment will be confined to the District's boundaries.

7.6 A key production requirement of the SHLAA process is that the assessment is produced in association with key stakeholders. In acknowledgement of this requirement Breckland has established a Strategic Housing Land Availability Assessment Steering Group. This group comprises key stakeholders from the house building, planning and social housing sectors alongside representatives from the Housing, Planning Policy, Development Control and Asset Management teams on behalf of the District Council.

7.7 The Steering Group operates by way of a series of round table meetings held by the Council. The Steering Group shaped the initial and revised methodology for the assessment having regard to the comments made in response to consultation on the initial draft methodology. However, the actual assessment of sites will be carried out by officers on behalf of the District Council.

7.8 It is necessary for the assessment process to be transparent and accountable, this is equally as important at the methodology development stage as it is at the final assessment stage. In recognition of this necessity the recommendations of the Steering Group on the development will be reported to the Council.

7.9 The Steering Group comprises representatives from the development industry and it is necessarily small in order that it can operate effectively.

7.10 It is important to acknowledge at this stage that although the SHLAA is an important evidence source to inform plan-making it does not in itself determine whether a site should be allocated for housing development.

7.11 Whether a site will be allocated for housing or not is a matter to be considered as part of the plan making process. It is for the SHLAA to identify potential sites, their constraints and provide an estimation of whether a site is deliverable or developable. It is for the plan making process to make a judgement as to whether a site is suitable to be allocated or not.

Stage 2: Determining which sources of sites will be included in the SHLAA

7.12 Practice guidance indicates that the SHLAA should aim to identify as many sites with housing potential in and around as many settlements as possible in the study area. Work has been already been undertaken on updating the Urban Capacity Study that was published in 2007. The Urban Capacity Study identified a number of sources of supply which are set out in Table 6.1 below:

Source:	Comment:
Subdivision of existing housing	Where an existing large dwelling is subdivided into two or more units. The theoretical potential capacity from this source is very high if it is assumed that every large house could be subdivided. However, it is essential to establish a realistic appraisal of potential from this source.
Flats over shops	Estimates of the potential from this source vary considerably. There is likely to be some potential in Breckland arising from flats over shops.
Empty homes	The stock of empty homes in England varies around 750,000 which is around 3.7% of the housing stock. Empty properties in Breckland are currently in the region of 1,580 which is approximately 3.1% of the overall housing stock in Breckland. This source of capacity is outside the direct control of the planning system; however, emerging regional housing figures will have taken empty properties into account in their calculations. Therefore in order not to double count, empty homes will not be considered as part of this study.
Previously-developed vacant and derelict land and buildings (non housing)	The sites from this source are those that fit within the standard perception of what is previously-developed land. The principle starting point for this source is the NLUD-PDL. The definition of previously-developed land is contained within Annex B of PPS3[1], as amended.
Intensification of existing areas	By developing areas such as garage courts, large gardens and backlands, the use of urban land is intensified. This is an area where the theoretical potential is very high but realistic capacity may be lower where some constraints may be difficult to overcome.
Redevelopment of existing housing	This category includes poor quality housing where redevelopment is the only viable option. In general terms this usually increases density and capacity but in the case of very high-density 'problem' housing reducing density may improve amenity.
Redevelopment of Car Parks	This source is similar to the intensification of existing areas, i.e. having a high theoretical potential however this source relates specifically to car parks.
Conversion of commercial buildings	Conversion of rural buildings to residential use has been popular for sometime whereas conversion of urban buildings such as offices has become more popular over the last ten years. There are particular problems with estimates of capacity from this source such as the wide variation in schemes being developed and the consequent problems with extrapolation of past trends.
Review of existing housing allocations	Revisiting existing housing allocations and assessing them within the current policy context may lead to sites being used more efficiently through the application of different design and layouts or result in a better mix of size and type of dwelling. However in some cases, it may lead to allocations being deleted if they are considered to no longer represent the best way of achieving policy objectives.
Review of other allocations	Revisiting other existing allocations is likely to be productive as quantitatively there is probably more land allocated than is needed. Furthermore, qualitatively these allocations may not be well located due to changes in the economy and

1 Planning Policy Statement 3: Housing

Source:	Comment:
	market forces may deem these surplus to requirements. There may also be potential for mixed uses. Given the peripheral location of the remaining allocations the relevant density assumption outlined in the methodology has been used to generate an unconstrained housing capacity figure.
Vacant land not previously developed	This source can be found by examining land as part of a comprehensive survey within the study area that has not previously been excluded by virtue of another designation or caveat. This may provide limited capacity, however there is likely to be some former or current Council owned land particularly that may be suitable for inclusion in this section.
Density increases on existing outline planning permissions	Sites within the identified settlements within the scope of the study that have the benefit of outline planning permission will be re-examined in light of density considerations put forward by this methodology. There may be some opportunity for density increases as a result of improvements in site layout, design and mix of dwelling types and any potential gain in numbers will be recorded. The likelihood of existing outline and detailed permissions to be brought forward to completion within the plan period will also be assessed along with the outstanding level of housing on sites currently under construction[2].

Table 7.1 Sources of Supply within the existing Urban Areas.

7.13 It is not the intention of the SHLAA to unnecessarily replicate data gathering that had previously been undertaken as part of the 2007 Urban Capacity Study (UCS). Nevertheless, there is a clear need to expand the UCS methodology to comply with the requirements of SHLAA. The sources and definitions used in the UCS will be retained for the purposes of the SHLAA, and the sites that were identified in the UCS will form the basis of the sites that will be assessed through the SHLAA. Although the UCS is relatively recent, the UCS land database will need to be updated: removing sites from the study that are no longer available and identifying further sites that have become available.

7.14 In addition to the sources of supply that were identified by the UCS, PPS3 requires the SHLAA to identify buildings or areas of land (including previously developed land and greenfield) that have development potential for housing, including within mixed use developments. This gives scope to consider a more comprehensive area than was taken into account in Urban Capacity Studies.

7.15 The additional sources of supply identified that will be assessed for their housing potential in the SHLAA are identified in Table 7.2 'Additional sources of supply that will be considered by the SHLAA'.

Previously developed, vacant and/or derelict land and buildings (non-housing)	This category is expanded in the SHLAA to cover all land that falls within the definition of previously-developed land contained in Annex B of PPS3, including those which would previously have been excluded as they are located outside of an existing built up area. Examples of PDL might be former industrial land, derelict buildings and vacant lots. Some sites may have temporary uses on them such as car-parking.

Greenfield sites adjacent to existing built up areas.	In order to make a comprehensive assessment of land availability and in order not to narrow down options for the plan making process, consideration also needs to be given to greenfield sites adjacent to, or within, existing settlements.

Table 7.2 Additional sources of supply that will be considered by the SHLAA

7.16 Therefore the SHLAA will consider not only previously-developed land within the existing built up areas, but also previously developed land outside these areas and appropriate greenfield areas on the edge of settlements.

Stage 3: Desktop review of existing information

7.17 Having identified the potential sources of capacity, shown in Tables 6.1 and 6.2, it is necessary to illustrate how existing information will be reviewed to inform the assessment and identify sites. This is to allow a clear understanding of how the data has been gathered and to ensure thoroughness in the approach.

7.18 The first task is to review the sites that were identified by the previous SHLAA. As previously stated, the sites identified in the previous SHLAA will be the starting point for sites to be assessed by this review . A review will be made of the sites that have been identified using the planning register, council tax records, consultation with development control colleagues and site investigations to identify whether the sites have now become unavailable for housing development.

7.19 After the accuracy of the existing evidence base has been verified work will be undertaken to identify sites that have subsequently come forward.

7.20 The data sources that will be used in the desktop review to identify additional sites that have come forward will include:

- NLUD PDL
- Breckland Council Town Centre Retail Study
- Breckland Council Employment Land Review
- Breckland Council Urban Capacity Study
- Council Tax Records
- Scaled Base Maps
- Aerial Photography;
- Consultation with development control colleagues and key stakeholders; and,
- Sites promoted for development in response to the formal “call for sites” as part of the pre-production of the Site Specific Policies and Proposals DPD.

7.21 It is important to note that the SHLAA will not rely on trend based sources of information, such as the sub-division of existing housing. For the sake of completeness stage 10 of the process will identify expected windfall from trend based sources based upon previous trends. However, as the realisation of these sources is less sure than identified sites they will not form part of the identified land that is suitable for housing.

7.22 For the purposes of identifying the sites from the sources set out in Table 7.2 'Additional sources of supply that will be considered by the SHLAA' the assessment will principally use land representations that have been made to the council. This method is considered to be preferable to arbitrary subdivisions of potential sites on the edges of or within settlements, or other mechanisms for artificially identifying sites, because it gives the authority a good degree of surety upfront that the land is available, and that there are not conflicting interests through multiple ownerships. In addition, the sites identified by the previous SHLAA which are still available will only be considered as part of the assessment if the Council has some evidence that the land is still available for development.

Stage 4: Determining which sites and areas will be surveyed

7.23 Having identified the different sources of supply, and how those sites will be identified, it is necessary to consider which of those sites and areas will be surveyed.

7.24 Particularly in relation to the identification mechanism for the sources set out in Table 7.2 'Additional sources of supply that will be considered by the SHLAA', there is the potential for a significant number of sites to be identified, many of which could be very unlikely to be suitable for residential development. Although a detailed assessment of a sites developability/ deliverability will be undertaken in Stage 7, it is considered necessary at this stage to set out qualifying criteria for sites that will be assessed. The qualifying criteria is necessary to prevent excessive and potentially unproductive work and is based upon a sites policy suitability that is derived from National Planning Policy and locally developed evidence base.

7.25 Practice guidance indicates that provided adequate justification can be produced, particular types or areas of land may be excluded from the assessment[(2)].

7.26 The starting point for any policy based qualifying criteria would be National Planning Policy which relates to housing. For the purposes of this assessment PPS1: Delivering Sustainable Development and PPS3: Housing, have informed the National Policy element of the qualifying criteria. In addition to National Planning Policy, the principles of the Regional Spatial Strategy: The East of England Plan are an important consideration. The Regional Spatial Strategy still forms part of the Development Plan for the area and as such will be material in the assessment of a site's suitability in policy terms for the purposes of this SHLAA. Finally, the Council has a well developed evidence base that has informed the formation of its LDF. It is considered that significant weight can be given to the local policy and the evidence base that underpins it.

Planning Policy Statement 1: Delivering Sustainable Development

7.27 PPS1 sets out the overarching policies on the delivery of sustainable development through the planning system. The policies set out in the PPS are material to the plan making process and to decisions on individual applications.

7.28 PPS1 states that sustainable development is a core principle that underpins planning. Planning should facilitate and promote sustainable and inclusive patterns of urban and rural development. This will be achieved by making suitable land available for development in line with economic, social and environmental objectives, contributing to sustainable economic development, protecting and enhancing the natural and historic environment, ensuring high quality development and ensuring that development supports existing communities and contributes to the creation of sustainable communities with good access to jobs and key services for all members of the community.

7.29 PPS1 indicates that planning should improve access to jobs, health, education, leisure and facilities by ensuring that new development is located where everyone can access services and facilities on foot, bicycle or public transport rather than having to rely on the private car. More generally, planning should reduce the need to travel, managing patterns of growth to make the fullest use of public transport and focusing new development in existing centres and near public transport interchanges.

7.30 PPS1 also emphasises the need to contribute to global sustainability by addressing the causes of climate change on the basis of sound science minimising impacts from the management and use of natural resources. This objective may, for example, be realised through reducing energy use and taking climate change impacts into account in the location of new development.

2 Strategic Housing Land Availability Assessments Practice Guidance - Para. 21

Planning Policy Statement 3: Housing

7.31 PPS3 sets out the national planning policy framework for delivering the Government's housing objectives. Similarly to PPS1, The policies in PPS3 are material to the plan making process as well as to decisions on individual applications.

7.32 PPS3 states that it is Government's policy to ensure that housing is developed in suitable locations which offer a range of community facilities and with good access to jobs, key services and infrastructure.

7.33 PPS3 also states that Local Development Documents should set out a strategy for the planned location of new housing which contributes to the achievement of sustainable development. Local Authorities, working with stakeholders, should set out criteria to be used for identifying specific sites taking into account:

- The spatial vision for the local area, having regard to relevant documents such as the Sustainable Communities Strategy, and the objectives of the Regional Spatial Strategy;
- Evidence of current and future levels of need and demand for housing as well as the availability of suitable, viable sites for housing development.
- The contribution to be made to cutting carbon emissions from focusing new development in locations with good public transport accessibility and/or by means other than the private car and where it can readily and viably draw its energy supply from decentralised energy supply systems based on renewable and low-carbon forms of energy supply, or where there is a clear potential for this to be realised.
- Any physical, environmental, land ownership, land-use, investment constraints or risks associated with specific sites, such as physical access restrictions, contamination, stability, flood risk, the need to protect natural resources e.g. water and biodiversity and complex land ownership issues.
- Accessibility of 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.
- The need to provide housing in rural areas, not only in market towns and local service centres but also in villages in order to enhance or maintain sustainability.

Regional Spatial Strategy: The East of England Plan

7.34 The new Government has signalled its intention to remove the Regional Planning Tier from the Development Plan. As such, in planning terms the East of England Plan no longer has any significant weight that can be applied to it and the SHLAA now looks solely to the Council's adopted Core Strategy DPD and the provisions of national policy for guidance.

Breckland District Council adopted Core Strategy and Development Control Policies Development Plan Document

7.35 One of the purposes of the SHLAA has been to inform the Core Strategy of Breckland's Local Development Framework and other emerging Development Plan Documents.

7.36 However, the evidence base, including Sustainability Appraisal, that has been produced as part of the ongoing development of the Core Strategy and other DPDs provides a number of insights into the district. These insights provide clarity on the types of locations within the district where new development can be considered to be in line with National and emerging regional planning policy.

7.37 Therefore, in this way it is considered appropriate to incorporate some of the findings derived from the evidence base of the Core Strategy and other DPDs into the qualifying criteria that will be used in the context of any individual sites.

Qualifying Criteria for Sites and Areas that will be Surveyed

7.38 It is considered that higher level policy guidance is quite clear on the need to locate new development in areas where there is good access to services and facilities in order to create sustainable patterns of development. The evidence base produced as part of the development of the Core Strategy has identified that there are a limited number of settlements which can be considered reasonably suitable for new development due to the availability of services and facilities, these settlements are:

- Thetford
- Attleborough
- Dereham
- Swaffham
- Watton
- Banham
- East Harling
- Great Ellingham
- Litcham
- Mattishall
- Mundford
- Narborough
- Necton
- North Elmham
- Old Buckenham
- Saham Toney
- Shipdham
- Swanton Morley
- Weeting

7.39 Therefore, only sites that are within or immediately adjacent to these settlements will be surveyed for the purposes of the sources set out in Table 6.1 and Table 6.2.

Site Size Threshold

7.40 In order to prioritise the assessment of sites that are considered to be of strategic importance, only sites that are likely to yield 10 of more dwellings in the case of the market towns or 5 or more dwelling in the case of the other villages will be considered as part of the SHLAA. This site size threshold will apply to the sources set out within tables 6.1 and 6.2.

7.41 It should be noted that the purpose of this document is to advise the production of the LDF, it does not define the locations of new development that will be defined by the LDF, just because land is assessed in this document does not mean that it will be allocated for new developments, and visa versa.

Step 5: Carrying out the Survey

7.42 Where information held on file about specific sites is considered unreliable or new sites are identified, site surveys will be carried out to get an up-to-date view on development progress (where sites have planning permission), and to identify any possible constraints to development.

7.43 Site surveys will identify and record the following characteristics where appropriate:

- 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, street furniture or pylons etc;
- Development progress;

Stage 6: Estimating the housing potential of each site

7.44 The information gathered in the field will be used to construct detailed profiles of sites that are to be included in the study. This will enable accurate assessments to take place of a site's housing potential.

7.45 The estimation of a sites housing capacity will be made by using a series of multipliers. This method recognises that it is important to consider national standards, but is also important to reflect local issues. It is considered that broad-brush techniques such as typical urban area studies to generate capacity figures may lead to unrealistic results in a more rural context such as Breckland. By employing a simple formula that uses a number of different multiplier values it is possible to generate some generalised but relatively reliable capacity estimations.

7.46 The density multiplier will be used to show the density that a site can theoretically achieve. This theoretical capacity will not always reflect the aspirations of any individual developer who may be seeking to provide a particular type of housing but rather will indicate what could reasonably be achieved on site. The multipliers that will be applied to each site will be based on the accessibility of the site and a generalised view of the characteristics of its geographical location. As such, those sites that are located in areas with good access to public transport such as Town or District centres, where the prevailing character is generally higher density development, will be considered to be capable of supporting higher density developments. The less accessible a site is and the less dense the prevailing character is likely to be, the less sustainable it is considered. As a result a lower density multiplier will be applied to locations in this situation.

7.47 The following table shows the multipliers that will be used:

Accessibility/ Location	Density Multiplier
1. Most accessible (Town Centre)	45
2. Edge of Centre	40
3. Edge of town	30
4. Out of town & Local Service Centre villages	25

Table 7.3 Density Multipliers

7.48 The review of the SHLAA provides an opportunity to reflect upon the values used in the context of the current development climate. The new Government elected in 2010 has made some amendments to PPS3 and has removed the national indicative minimum density from the statement. This combined with changes to the development market in the UK mean that it was considered appropriate to reconsider the density multipliers used which has led to the figures indicated above. However, it is still considered that higher densities could be achievable in certain locations, as advocated by bullet point three of paragraph 46. For example, in town centre locations with good access to public transport, and highly accessible edge of town centre sites. Therefore it is important for this study to take these factors into account.

7.49 For the purposes of this assessment the Town Centre is defined as an area which includes the Primary Shopping Area and areas of predominantly leisure, business and other main town centre uses which are adjacent or proximate to the primary shopping area. The extent of the Town Centre for the purpose of this assessment is set out on the adopted Proposals Maps. In accordance with the criteria set out within PPS4: *Sustainable Economic Development*, an edge of centre site is defined as any site that is wholly within 300m of the defined town centre boundary. For sites that are only partly within 300m of the town centre, provided that at least 60% of the site is within 300m the site will be considered to be edge of centre. Out of centre sites are those which are not in or on the edge of centre but which are within the settlement boundary of a market town as defined by the Breckland District Local Plan. Out of centre sites are those that are outside of the settlement boundaries of a market town or are within or on the edge of a village.

7.50 Sites of a certain size will, if developed, require other infrastructure to serve them, e.g. incidental open space; landscaping, access roads and children's play space. Therefore a calculation of net dwelling density must be made to ensure a realistic figure of the dwellings that will yield from a particular site. Therefore, the site size multiplier is in effect a device to calculate an approximate 'net developable area' on a given piece of land. Therefore, in assessing the size of a site, a certain scale of physical infrastructure is required, and one of the multipliers illustrated in the following table should be applied. The provision of open space would only be expected on larger sites and sites of this scale would also be expected to require major service roads, hence their inclusion together as a multiplier.

Rules	Multiplier
Minor service roads (sites up to 8 dwgs)	1
Major service roads (sites between 8 – 25 dwgs)	0.9
Provision of open space & major service roads (sites 0.83 ha/ 25+ dwgs)	0.8

Table 7.4 Open space and major service roads multiplier

7.51 Breckland Council's current adopted Core Strategy DPD states that provision for Open Space will be provided on sites where there are to be 25 dwellings or more. In order to ensure that the SHLAA uses the most up-to-date information a threshold of 25 dwellings will be used for the purposes of the SHLAA. This is converted into a multiplier that can be applied to sites based on size using an assumed minimum density of 35 dph derived from the rationale used by the density multiplier.

7.52 The calculation is as follows:

1÷35 x 30 = 0.71

7.53 Therefore, all sites above 0.71 ha will be subject to the Open Space and Major Service Roads multiplier.

7.54 Under current Local Plan policies, the provision for formal Open Space in new developments would not be required where it is not considered to be an efficient use of land. For example, this could be a development in a town centre location where open space would not make best use of land. In addition, this could be applied to a site in a location in very close proximity to an existing area of open / recreation space which meets the need of the development. In this case the major service road multiplier only will be applied to reflect this approach.

7.55 Where a site has been identified for inclusion in the study, it is important to consider the effect of shape on the likelihood of the site reaching the density implied by the initial multiplier figure. If a site is of an elongated or highly irregular shape, due to the positions of the site boundaries themselves or other site characteristics or physical

constraints, this may prevent the desired density being achieved as it would be difficult to utilise high quality design techniques in order to achieve the maximum density figures. Therefore, by using a site shape multiplier this take difficult site shapes into account in order to generate a more reliable 'unconstrained' capacity figure.

Shape	Multiplier
Regular shape which facilitates well designed schemes	1
Long or highly irregularly shaped site where design is highly difficult	0.75

Table 7.5 Shape Multiplier

7.56 The following calculation is an example of how the initial 'unconstrained' capacity figure has been reached:

site area x density multiplier x shape multiplier x size multiplier = Unconstrained Capacity

Stage 7: Assessing when and whether sites are likely to be developed

7.57 The next stage of the assessment is to consider and identify whether sites are genuinely available for development and are realistically deliverable and developable.

7.58 A deliverable site is a site that is available now, offers a suitable location for housing development now and there is a reasonable prospect that housing will be delivered on the site within five years. A developable site will be a site in a suitable location for housing development with a reasonable prospect that the site is available for, and could be developed at a specific point in time.

7.59 It is important to reiterate at this stage that although this assessment will be an important piece of evidence that will inform plan making, it does not in itself determine whether a site should be allocated for housing development. The decision on which sites will be allocated for a particular type of development will be made through the production of the Site Specific Policies and Proposals DPD and the Thetford Area Action Plan. These documents will be produced in accordance with the relevant regulations, which include significant phases of public consultation.

7.60 The assessment of development constraints is inherently judgemental. The question of whether or not a particular constraint will prevent development on a particular site is complex. The decision of whether a particular constraint can be overcome will be dependant upon the nature of that constraint and the viability of developer contributions paying for constraints to be resolved. Alternately it may be dependant upon the potential for public sector intervention to release constraints or the will of a service provider to install strategic infrastructure to support possible future growth.

7.61 In order to assess the constraints that apply to a particular site an assessment matrix has been produced. This assessment matrix has identified two types of constraint;

- Fundamental constraints that cannot be overcome through developer contribution or provision; and,
- Non-fundamental constraints that may be able to be overcome via technical solution or developer contribution / provision.

7.62 In addition to constraint identification, elements of the assessment matrix will identify where particular accessibility attributes of the site positively enhance its suitability for housing or visa versa.

7.63 Four separate categories of constraints have been identified, one of which contains suitability attributes. These categories are:

- Physical Qualities of the Site;

- Environmental Impact;
- Operational / Policy Availability; and,
- Accessibility (this category includes some suitability attributes)

Explanation of Constraints

Physical Qualities of Site

7.64 One of the key aspects to consider when assessing whether a site is realistically developable or deliverable is the physical qualities of the site itself. For example a site that has significant problems achieving a suitable access may be undevelopable. Alternately a need for significant remediation works to address contamination issues may not leave sufficient residual value to make a site viable or attractive development opportunity.

7.65 In recognition of these possible physical constraints, four criteria have been defined by which to assess the constraints that may impede development in relation to the physical qualities of the site.

7.66 Highway Access (On-site) – The ability of a developer to provide suitable access to a site is a key measure of realistic developability. This constraint will be assessed on an individual site basis having had regards to the ability to provide a suitable access into the site. On-site highway access is considered to be a fundamental constraint because if suitable access cannot be achieved onto a site housing development would not be achievable.

7.67 Detailed decision making criteria for the establishment of whether on-site access could be achieved comprise; physical attachment of the site to an existing road; the likelihood of needing to make highway improvements across land in a different ownership; and, restrictions to improvement works, such as Tree Preservation Orders or the need to demolish important buildings.

7.68 Highway Access (Off-site) - In addition to providing direct access to a site the effects of development may mean that the wider road network would be unsuitable to cope with any extra pressures. This is not considered a fundamental constraint as there is the potential to mitigate off site impacts through developer contribution.

7.69 Whether or not off-site highway constraints would render a site undevelopable would depend on the nature of the off-site works that are required and the development value of the site. For the purposes of constraint identification each site will be considered against the need for off-site highway works. Depending on the nature of the works the effect of the criteria will be ranked as severe and possibility risking the viability of the site, relevant to the site but unlikely to have a significant impact on its achievability or that the assessment of the constraint indicates that suitability or achievability of the site for development.

7.70 The detailed decision making criteria for this constraint will comprise whether there are known off-site highway constraints that affect the site. The assessment of this criterion will be undertaken in consultation with the Development Control section of the District Council and the Highway Authority and with reference to the planning register.

7.71 Contamination – For a site to be considered developable it will need to be “fit for purpose”, this means that any contamination issues will need to be resolved to make the site fit for human habitation. The contamination of a site is not considered to be a fundamental constraint as remedial works can be undertaken to overcome even severe contamination issues.

7.72 Similarly to off-site highway work, whether the level of contamination on a site would render a site undevelopable would depend on the severity of the contamination and the value of the site for development. For the purposes of constraint identification sites will be as severely constrained, possibility risking the viability of the site, that contamination is relevant to the site but unlikely to have a significant impact on its achievability or that the assessment of the constraint indicates that suitability or achievability of the site for development.

7.73 Detailed decision making criteria will comprise whether there is any known contamination issues on site or if there is a known previous use that would be likely to result in contamination. The assessment of this decision making criteria will be undertaken in consultation with the Council's Development Control and Environmental Health Sections, utilising the Council's GIS system.

7.74 Utilities – The ability of a site to obtain adequate utilities servicing will be an important consideration in respect of whether a site is developable. In broad terms it is reasonable to assume that a site can always secure servicing at a cost. However, if there are significant utilities constraints the cost of obtaining servicing from the relevant provider may mean that the site becomes unviable. Alternatively a very long lead in time for servicing to be secured may itself be a disincentive to development.

7.75 Sites will be classified in relation to known utilities constraints as either severely constrained, requiring servicing but no abnormal costs anticipated or availability of servicing positively indicates achievability of the site. The detailed decision making criteria will comprise known utilities constraints identified through discussions with service providers and evidence provided to the council on specific sites that have been promoted to the Council for residential development.

Environmental Impact

7.76 Another key issue when considering the likelihood of a site being deliverable is whether there are any environmental constraints relating to the site, or its immediate surroundings, that would limit its potential to gain a planning permission. These may take the form of policy issues such as existing conservation designations or known flood risks, but will also consider issues of proximate pollutant sources.

7.77 Designated / Protected Areas – Breckland contains large areas of land that are afforded protection due to their environmental importance. Some of these areas, such as the Brecks, have international protection. Other areas may not benefit from international protection but have national, regional or local significance and would therefore still benefit from protection against development. In particular, scientific evidence has revealed a negative association between the development of housing and roads on the breeding productivity of stone curlew, a species for which the Breckland SPA was designated. This effect was identified as being most significant at a distance of 1,500m from the SPA supporting or capable of supporting the interest feature. The adopted Core Strategy sets out a restrictive policy approach within this 1,500m area. There is also a likely significant effect on the woodlark and nightjar interest features of the Breckland SPA resulting from development within 400m.

7.78 Designated and Protected areas are considered to be a fundamental constraint as development that has a detrimental effect on these areas, or caused their loss would be unacceptable in planning terms. Breckland Council has a record on its GIS system of all existing environmental designations in the district. The detailed decision making criteria will be where a site is within an environmental designation, or is adjacent to a designation and is likely to have a significant effect, it will be identified as being subject to a fundamental constraint and discounted from the study.

7.79 Flood Risk – Current national policy sets out stringent requirements in terms of the consideration of flood risk. Where a site is at significant risk of flooding it is unlikely to be considered suitable for development. However, sites outside areas of the highest risk of flooding can be considered for development should there be no other available land suitable to accommodate the development. Therefore it is not considered that flood risk is necessarily a fundamental constraint. Sites will be classified in terms of the severity of the flood risk that affects them. This classification will comprise severe constraints that raise questions about the suitability of the site for development, a constraint affects the site but does not bring significantly into question the suitability of the site or that the constraint does not affect the site.

7.80 The Council's GIS contains details of areas of flood risk in the District. The detailed decision making criteria will be that any site wholly or substantially within zones 2 or 3 will be classified as severely constrained. Sites with only a small proportion in zone 2 will be classified as the effect being material but not bringing into question suitability. Site outside of zones 2 and 3 will be classified as unconstrained.

7.81 Nitrate Sensitivity – The maintenance of the water aquifer which underlies Breckland is an important consideration. This aquifer lies very close to the surface at points within the district, which leads to potential aquifer contamination issues should significant excavation be carried out in that area. As development that would have a detrimental impact upon the quality of the aquifer would not be permitted this constraint will effect whether a site is developable.

7.82 The Council's GIS contains maps of nitrate sensitive areas. The detailed decision making criteria will be if a site is within or directly abutting a sensitive area the site will be considered severely constrained. For sites closely related to a sensitive area the constraint will be considered material but not likely to affect its developability. Sites not within or closely related to a sensitive area will be classified as unconstrained in this regard.

7.83 Proximity to Pollutant Sources – For a site to be considered suitable for residential development it must be "fit for purpose". This would include an element of separation from significant pollutant sources. The type of pollution that might be considered would include air quality, noise, smell and vibration. Sites proposed for residential development that were also significantly affected by a significant pollutant source would be unlikely to obtain planning permission and therefore I would effect whether a site could be considered developable. As there may be some possible mitigation against these effects proximity to pollutant sources is not considered to be a fundamental constraint.

7.84 Site investigation, undertaken at stage 5 of the assessment, will identify where there are proximate pollutant sources, this will include HSE zones. The detailed decision making criteria for the constraint will be that where a site directly abuts or is very close to a significant pollution source it will be considered severely constrained in this regard. Where a site is proximate but not abutting or closely related to a pollutant source the constraint will be identified as material but ultimately not likely to bring into question the developability of a site. Sites that are not proximate to a pollutant source will be considered to be unconstrained in this regard.

7.85 Landscape Impact – The aesthetic quality of a landscape is given significant protection in national planning policy. Where development would have a significant detrimental impact upon important qualities of the landscape it is unlikely to gain planning permission. Therefore it is an important consideration when assessing the deliverabilty or developability of any site.

7.86 The detailed decision making criteria for the impact that a development will have on the landscape will be based upon the findings of the Council's Landscape Character Assessment and Landscape Character Assessment Fringe Study. If a site is within an area identified as having a high or high to moderate sensitivity to development will be considered severely constrained. If a site is within an area of moderate or moderate to low sensitivity to development then the site will be considered constrained but that constraint is unlikely to bring into question the developability of the site. If a site is within an area of low landscape sensitivity then the site will be unconstrained.

Operational / Policy Availability

7.87 The residential development of a site may be constrained by ongoing alternative uses that are on the site or existing policy designations.

7.88 Existing Use in Operation – If a site is currently being used for another purpose then there can be no guarantee that the use will cease even if the owner has promoted the site. This is because there may be leasing agreements with current occupiers or the owners existing operation on site must relocate before development can occur. Therefore an existing use can affect the deliverability if not the developability of a site.

7.89 Any existing operations that are taking place on site will be identified during the site investigations undertaken at stage 5 of the assessment. Detailed decision making criteria for this constraint will be that if there is an established large business operating from the site, or multiple small businesses, then the site will be considered severely constrained. If there are only a minimal number of small businesses or the site has a temporary use then the constraint will be considered material but not likely to affect a sites deliverability or developability. If a site is vacant the site will be considered unconstrained.

7.90 Important Employment Location – Sites in the district that have been designated as employment land. Planning permission is unlikely to be granted where it would result in the loss of an important employment site and therefore this will effect whether a site can be considered developable.

7.91 The Council's GIS contains the employment designations and will be used to assess the potential sites. The detailed assessment criteria will be that site's within a fully developed or strongly developing employment site will be considered severely constrained. Sites within an employment site that has not been significantly built out over the plan period will be considered constrained, but that that constraint is unlikely to significantly affect the developability of a site. Sites outside of a designated employment area will be considered unconstrained.

Accessibility

7.92 The accessibility of key services and facilities is an important consideration in regards to whether a site can be considered suitable for residential development. Although constraints of this nature have, to an extent, been addressed through the qualifying criteria for sites that will be surveyed, stage 4, there will be a need to consider more site specific issues. In particular if a developer is required to provide mitigations to an identified accessibility issue, for example a pump primed bus service, the provision of a district or community centre or an area of open space, then this may affect the viability of a site and thus its developability.

7.93 Access to Public Transport – Public transport has a key role in ensuring that facilities, services and employment opportunities are available to all. As explained in Stage 4, National Policy sets out that new housing should be located in areas with good access to services and facilities. Therefore sites with particularly poor access may be unlikely to receive planning permission without mitigations to improve accessibility such as public transport.

7.94 The quality of public transport has three key elements, nearby connection point, bus stop / train station, regular / frequent service and the linkage between the connection point and key service providing locations, for example a market town or regional centre. For the purposes of the detailed decision making criteria for this constraint, a site that has a bus stop / train station within 800m (10 mins walk), based upon a usable network, and where that bus service will provide at least a commutable service to a market town or higher order centre of no more than 30mins will be considered to be particularly suitable for development. A site that is within 800 metres of a bus stop that provides a commutable service to a higher order centre of between 30 and 60 mins will be considered adequate. A site with lesser provision will considered to be severely constrained in this regard. A commutable service is one which provides a bus service that could reasonably be used for travelling to and from work, i.e. arriving at destination before 9am with a return from the destination at 5:30 or later.

7.95 Access to Facilities – National policy is clear that new housing should generally be located close to existing services and facilities. A lack of accessibility to such services and facilities is an important constraint as very poor access to services may limit the potential of a site to obtain planning permission. In addition, poor access to services may mean that mitigation would need to be secured through development, for example a pump primed bus service, and this may affect the viability of a site.

7.96 The detailed decision making criteria for this constraint has been derived the five qualifying criteria set out for service centre villages in the adopted Core Strategy document. The key services and facilities that will be used for the purposes of this assessment are:

- Primary School

- Health Care Facility
- Convenience Shop

7.97 If a site is within 800m of at least 2 of these facilities and the other facility is within the same settlement then this will be considered to be a positive indication of the sites suitability. If only 1 facility is within 800m, but the other 2 facilities are within the same settlement as the site then the constraint will be considered relevant but not significant in terms of the suitability and achievability of the site. If less than 2 of these facilities are available within the same settlement then the site will be considered severely constrained.

7.98 Access to Open Space – National policy, in the form of PPG17, states that open spaces, sport and recreation all underpin people's quality of life. It is considered essential that new development should have or provide access to a good range of recreational facilities and open space. Where a site will need to provide or make contributions towards open space this may affect a site's viability. Where a site has very poor access to open space the suitability of the site may be questionable and this may reduce the chance of the site gaining planning permission.

7.99 As a development may be occupied by a range of difference people it would be reasonable to conclude that a range of facilities will be needed to fulfil that need.

7.100 The detailed decision making criteria for this constraint will comprise that where the site does not have access to open space in line with the NPFA thresholds and there is no reasonable chance that this situation could be improved the site will be considered to be severely constrained. Where a site has access to a level of facilities but they are not at a level that is equivalent to the NPFA standard then the constraint will be considered material to the sites but unlikely to bring into question its suitability or achievability. If a site would already have access to NPFA levels of open space then this constraint will be considered to positively indicate the suitability of the site for residential development.

7.101 Access to Employment – National policy in the form of PPS3 explains the Governments objective to ensure that housing is developed in suitable locations with good access to jobs. If a site had particular poor accessibility in relation to employment opportunities it would raise questions about the suitability of the site for residential development. Therefore this constraint has a bearing on the developability of a site.

7.102 Elements of this constraint will have been dealt with in section 4 where qualifying criteria was set out that limited the locations which were to be surveyed. The qualifying criteria will have by its nature limited the number of locations with no access to employment facilities. However, there may still be locations with poor access to employment and this will need to be identified for the reasons set out above.

7.103 The detailed decision making criteria for this constraint will be that where a site is within a market town or has a regular, commutable, public transport service to a market town, regional centre or similar this constraint will be considered to positively indicate the suitability of the site. If a site is not within a market town and does not have commutable public transport to a market town, regional centre or similar but there is limited local employment opportunities within the same village the constraint will be considered material to the site but unlikely to raise questions about the suitability or achievability of the site. Where a site has particular poor access to employment with not even limited local opportunities the site will be considered to be severely constrained in this regard.

7.104 Social Infrastructure Constraints – If there are particular constraints to the capacity or expansion of a key element of social infrastructure, e.g. schools or health care facilities, this may have a significant cost or timescale implication for development. It is possible that the costs that would need to be extracted may bring into question whether the site was viable.

7.105 Sites will be classified in relation to known social infrastructure constraints as either severely constrained, requiring expansion to social infrastructure but no abnormal costs anticipated or availability of social infrastructure capacity does not constrain the site. The detailed decision making criteria will comprise known social infrastructure constraints identified through discussions with key stakeholders and evidence available to the council as part of the LDF evidence base.

Quantification of constraints to development

7.106 In order to quantify the impact of the constraints that have been identified each site will be individually assessed based upon the constraints set out above. This assessment will be displayed as a matrix which will provide a broad overview of the extent and significance of constraints that affect a particular site. The assessment of these constraints will then inform a more detailed consideration of their effects through the process of identifying actions to overcome constraints and viability testing stage, which will try and account for any abnormal costs. If a site's suitability is brought significantly into question through the constraint assessment it will be discounted from the initial viability assessment.

7.107 The criteria used in the SHLAA are necessarily broad and, in as far as is practical, neutral from a local policy perspective. This has been done in order to ensure that, within reason, all available sites have been assessed in order to get a true picture of likely developable land availability. A more detailed assessment of sites will be made during the production of the Site Specific Policies and Proposals DPD and Area Action Plan DPDs. This more detailed assessment will include and take into account representations made in response to consultation on the DPD.

7.108 It should be re-iterated that a site that performs well in the SHLAA will not necessarily be a site that will be allocated for housing development through the Site Specific Policies and Proposals DPD or the Area Action Plan DPDs.

7.109 The following table sets out the criteria and assessment system of the Suitability and Achievability Matrix:

Suitability and Achievability Matrix – List and Categorisation of Constraints	
Category A – Fundamental Constraint	**Category B –Constraint that may be able to be overcome via technical solution or developer contribution / provision. Also factors indicating possible suitability of the site for development.**
Physical Qualities of Site	
Highway Access (on-site)	
	Highway Access (off-site)
	Contamination
	Utilities
Environmental Sustainability	
Designations / Protected Areas	

	Flood Risk
	Nitrate Sensitivity
	Proximity to Pollutant Sources
Operational / Economic Availability	
	Existing Use in Operation
Accessibility	
	Access to Public Transport
	Access to Facilities
	Access to Open Space
	Access to Employment
	Constraints on Social Infrastructure, e.g. Schools

Table 7.6 Suitability and Achievability Matrix - List and Categorisation of Constraints

Suitability and Achievability Assessment Matrix					
Assessment Matrix					
Category A Constraint; does the identified constraint rule out development on the site?	**Yes**	**No**			
Category B Constraint; How severe is the constraint?			**Constraint is very severe and its effect brings into question the achievability or suitability of the site.**	**Constraint is relevant to the site but it does not materially effect the achievability or suitability**	**Constraint assessment indicates that site is unconstrained or positively indicates that the site is suitable and / or achievable.**
Physical Qualities of Site					
Highway Access (on-site)					

Highway Access (off-site)				
Contamination				
Utilities				
Environmental Sustainability				
Designations / Protected Areas				
Flood Risk				
Nitrate Sensitivity				
Proximity to Pollutant Sources				
Landscape Impact				
Operational / Economic Availability				
Existing Use in Operation				
Designated Employment Site.				
Accessibility				
Access to Public Transport				
Access to Facilities				
Access to Open Space				
Access to Employment				

Constraints on Social Infrastructure, e.g. Schools				

Table 7.7 Suitability and Achievability Matrix

Identify actions to overcome constraints

7.110 Once the constraints on a particular site have been assessed, actions will need to be identified that could overcome those constraints. The actions that relate to a particular site will be necessarily individual, and therefore it is difficult to predict what form those identified actions might take.

7.111 The effect of the actions that are necessary to overcome any individual constraint will then be considered through the viability assessment. If constraints are identified as being insurmountable then the site will be discounted from the viability assessment.

Viability Assessment

7.112 Viability is key to assessing the likelihood of a site being deliverable. Put simply, the market will not bring forward a site with insufficient development value. However, viability is a difficult issue to assess, and a more difficult issue to predict for the future. Viability is based on a number of factors including, the price at which the land can be purchased from the original land owner, the realistic value that can be extracted from of a fully developed site, the build costs including servicing the site and any additional cost that the developer would be required by the LPA to pay in order to overcome constraints and the developers return.

7.113 Given the complexity and costs involved, it is unrealistic to assume that the Council can undertake a detailed viability assessment on every site that will be considered as part of this document. However, it is considered that the use of a viability model can be used to estimate whether the sites in the SHLAA are viable as part of the wider assessment of deliverability.

7.114 The review of the SHLAA presents an opportunity for the Council to utilise the Homes and Communities Agency (HCA) Area Viability Model which will enable groups of sites to be assessed together as part of a particular typology. The advantage of the use of such an approach is so that individual parcels of land that would normally be brought together as part of a development scheme can be assessed 'in the round' rather than potentially assessing one particular site in isolation. This represents an appropriate way of assessing the viability of sites in the SHLAA.

7.115 Therefore, using this approach means that the only remaining question in terms of a site's viability is whether there are additional, "abnormal" costs associated with a development that would mean that its residual value would be below that which the land could realistically be purchased. In many cases, such abnormal costs will not be known by the authority but the model will provide a general indication as to whether particular typologies are viable.

7.116 One of the key issues for this assessment to consider is land value. The base agricultural land price across the study area is on average £8,000 per acre, except in the rural villages where £12,500 per acre could be achieved reflecting the likelihood of smaller sites and sales for other rural uses (paddock, garden land etc) which will affect prices. Land values of £200,000 per acre for brownfield land have been assumed as there has been very limited movement on brownfield sites in the last 2-3 years. Existing use value premiums of around 15% would need to be realised in order to enable brownfield sites to come forward whilst providing a suitable return. In reality, landowners will only sell land at a certain price point taking into account a usable up-lift value for a greenfield site with residential

potential. Residential land values of around £350,000 have been noted in Attleborough, £300,000 per acre in Dereham and Swaffham, £250-300,000 in Watton and Thetford and £250,000 in villages. However, this would be based on a site with no significant constraints and a limited S106 requirements.

7.117 Average sales values per square metre in low, medium and high value areas have also been included as part of the assessment to further aid robustness. High value areas include Attleborough and the Local Service Centre villages; medium values areas include the Market Towns; the low value area is Thetford. The sales value areas were agreed through the steering group and were based upon the group's experience of local market conditions. The values attributed to each of the three sales values have been further checked using the Council's 'Hometrack' system which provides independent actual-market data across the District. This revealed that the costs were broadly accurate and provides an increased level of robustness to the values used.

7.118 In addition to the above, a range of values has been included in the model to take into account the normal costs that form part of development schemes. A list of the normal costs can be found at Appendix B. Specifically, the model requires the inclusion of average S106 costs per dwelling to be factored into the calculations as part of the generation of residual land values per typology. Therefore, it is necessary to develop an 'average' value based upon some recent examples of S106 costs on real development sites and consultation responses provided by Norfolk County Council based on their most recent Planing Obligations Standards.

7.119 It is useful for the SHLAA to include a basic allowance for some spare places in existing schools as this scenario can arises relatively frequently, but which reflects that schemes will otherwise be contributing to school extensions. The Council recognises that the planning obligations calculations developed by Norfolk County Council are more sophisticated than this study can fully reflect (such as reductions for multi-bed flats, assessment of numbers on school roles etc), but an average value of £5,300 per dwelling is considered broadly appropriate for the purposes of this document. This is based on 20% of assumed housing mix being either single or multi-bed flats. It also assumes that 21% of all persons generated by the development are under 16 years, and of these, around 30% of all children generated being Secondary School Pupils with the remaining 70% being Primary School or Nursery age. The cost includes Primary and Secondary school places, library books, open space and monitoring fees. In the Attleborough and Thetford urban extension typologies, the figures assume no spare capacity and the need for net new Primary Schools to be provided as part of the developments. As a result, a figure of £6,500 per dwelling has been used in these areas.

Delivery of sites

7.120 There are a number of factors that could determine when a site could realistically be brought forward for development. These factors will include the sites residual value, the timescale for putting in any necessary infrastructure, the complexity of the development, including time for the planning application and not least wider economic factors which affect the housing market.

7.121 For each of these factors an assessment will need to be made about whether they are an advantage or disadvantage, directly or indirectly related to the site and whether issues are short, medium or long term.

7.122 This assessment will then be developed into an indicative ranking of sites in terms of advantages and disadvantages they offer. Sites can then be categorised to give an indication as to whether they are deliverable and therefore suitable for inclusion as allocations in the first five years of the plan, or developable and suitable for inclusion in years 5-10, 11-15 or beyond.

Stage 8: Review of the Assessment

7.123 Once the initial survey work has been carried out and an assessment made of the of the different sites' developability/ deliverability, a theoretical housing trajectory can be established. This review will also include a risk assessment about whether the sites will come forward as anticipated.

7.124 Based upon rudimentary estimations it is not anticipated that the District is likely to discover a shortfall in the sites that are available for development. However, if at this stage it becomes apparent that insufficient sites have been identified and that further sites need to be sought work will be undertaken to review the sources and qualifying criteria for surveying that are included within the SHLAA to identify if additional site need surveying. In addition consideration will be given to whether there needs to be an assessment of potential broad locations for development or potentially windfall.

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

7.125 Where specific sites cannot be identified for housing in years 11-15, and beyond, broad locations where new housing development is considered feasible will be identified. This will benefit the process which makes positive choices about housing development, rather than being reactive to development opportunities as they arise.

7.126 Examples of broad locations suggested by the practise guidance include:

- Within adjoining settlements – for example, areas where housing development is or could be encouraged, and small extensions to settlements; and
- Outside settlements – for example major urban extensions, growth points or growth areas.

7.127 Where broad locations have been identified, estimates of potential housing supply will be developed having had regard to:

1. Any evidence underpinning the RSS;
2. The nature and scale of the opportunities within the broad locations; and
3. Market conditions.

Stage 10: determining the housing potential of windfall

7.128 Windfall sites are previously developed sites that come forward for development but have not been specifically identified as available in the plan process. PPS3 sets a clear expectation that the supply of land for housing should be based on specific sites. However, where local circumstances dictate allowances can be made on the basis of examining past trends in windfalls coming forward for development and on the likely future implementation rate.

7.129 The SHLAA will assess all land that has been promoted for development that falls within the qualifying criteria and the site size thresholds, which may include land currently in other uses. The details of which sites will be considered are set out in Stages 2, 3 and 4. However it will not make an arbitrary assessment of sites that have not been promoted for development or sites in broadly unsustainable locations. Therefore there is a reasonable likelihood that some sites may come forward for housing which have not been identified in this assessment. However, it is not considered that significant reliance can be placed on sites which are not apparently available or outwardly suitable or those that can only be estimated with trend based data.

7.130 The Council's Housing Trajectory does not rely on Windfall developments to deliver its housing targets.

8 Assessment Results

Results

8.1 The results of the study set out the expected capacity of developable sites across the locations identified in the Spatial Strategy for Breckland. The sites included have all been put forward by landowners or agents through the LDF process and as such this provides a clear indication of the availability of sites.

8.2 For the purposes of this assessment in accordance with the methodology, only sites that have been identified as being 'suitable' for housing have been taken forward to the viability assessment.

Capacity by typology

8.3 As indicated in the methodology, the 2011 study has considered capacity against a range of different typologies that describe the development areas in the district. The following table outlines the total capacities by typology and the indicative phases within which these could come forward.

	Grand total	2011-2016	2016-2021	Post 2021
Attleborough Brownfield	221	176	45	0
Attleborough Greenfield Urban Extension	10,538	344	990	9,204
Local Service Centre Village	1,895	1,800	95	0
Market Town Brownfield	380	67	313	0
Market Town Extension	4,072	1,632	1,083	1,357
Thetford Brownfield	22	10	12	0
Thetford Greenfield Urban Extension	5,000	0	0	5,000
Total by phase	22,128	4,029	2,538	15,561

Table 8.1 Constrained capacity by Typology

Capacity by settlement

8.4 The following table outlines the results of the constrained capacity broken down by settlement. This table does not differentiate land by typology and simply expresses capacity by location.

Settlement	2011 to 2016	2016 to 2021	Post 2021	Total Of Constrained Capacity
Attleborough	520	1,035	9,204	10,759
Banham	0	0	0	0
Dereham	551	721	600	1,872
Great Ellingham	61	95	0	156

Settlement	2011 to 2016	2016 to 2021	Post 2021	Total Of Constrained Capacity
Harling	529	0	0	529
Litcham	61	0	0	61
Mattishall	5	0	0	5
Narborough	403	0	0	403
Necton	172	0	0	172
North Elmham	31	0	0	31
Old Buckenham	10	0	0	10
Saham Toney	84	0	0	84
Shipdham	156	0	0	156
Swaffham	321	493	542	1,356
Swanton Morley	288	0	0	288
Thetford	10	12	5,000	5,022
Watton	827	182	215	1,224
Weeting	0	0	0	0
Total by 5 year period	4,029	2,538	15,561	22,128

Table 8.2 Constrained capacity by Settlement

Identification of Sites

8.5 Using the method set out in Section 6, 242 individual sites with the potential for residential development were identified for the purposes of this assessment. The number of individual sites for each location are set out in table 7.3. Maps illustrating the identified sites are included at Appendix D.

Suitability and Achievability

8.6 Once identified, the sites were assessed against the suitability and achievability matrix as set out within the methodology using the Council's GIS system. As a result of this assessment a number of sites were considered unsuitable for development or that development on site was unachievable. The results of the suitability/achievability matrix are included as Appendix E.

8.7 Development was considered to be suitable and achievable on 100 of the 242 sites that were identified. The distribution of those sites is set out in table 7.3 below:

Settlement	Total No. of sites	No. of suitable and achievable sites	No. Non-Deliverable
Attleborough	24	20	4
Dereham	24	8	16
Swaffham	20	9	11
Thetford	4	3	1
Watton	25	16	9
Banham	3	0	3
Great Ellingham	11	6	5
Harling	8	6	2
Litcham	5	4	1
Mattishall	8	1	7
Narborough	7	3	4
Necton	10	4	6
North Elmham	10	3	7
Old Buckenham	10	2	8
Saham Toney	17	5	12
Shipdham	32	6	26
Swanton Morley	13	4	9
Weeting	11	0	11
Total	**242**	**100**	**142**

Table 8.3 Number of suitable and achievable sites by location

8.8 Of the 100 sites that have been identified as suitable and achievable (i.e. could be built out in the years 2011-2026), these could yield a capacity of some 22,128 homes.

Viability

8.9 Having assessed whether the sites were suitable for development and whether development was achievable, those suitable and achievable sites were then considered within the viability model. These sites and their constrained capacities were inputted into the model. The results of which can be seen in Appendix D.

8.10 The HCA Area Viability model assessed the viability of sites on an area basis as this enables groups of sites to be brought together and in many cases share wider infrastructure costs associated with a particular development site. The S106 costs identified within the viability represent a current “best estimate” of the infrastructure costs associated with the development of a particular site typology. However, the costs should not be considered to be the Council’s final word on the contributions that may be sought in relation to a particular development site.

8.11 Further, any abnormal costs have not been factored in as identifying such costs would require a level of detail that is not able to be achieved in this study.

Outcome of viability testing

8.12 The initial viability assessment indicates that the Thetford Greenfield Extension typology has negative residual land values of minus £15,000 per hectare, with the Attleborough Greenfield extension typology also likely to be unviable. This is due to the fact they would have a residual value that is lower than what a landowner would be expected to sell the land for. However, this is based on a range of general assumptions about the likely cost of S106 per dwelling (in addition to the provision of affordable housing) and which may not materialise in specific cases if there is potential capacity in local schools etc which negates the need for contributions. However, the initial assessment is intended to give a broad estimate of the likely contributions required. As indicated in the methodology section, land with Planning Permission for residential development has anecdotally sold in the region of £300,000 per acre in Dereham and Swaffham, and in Watton and Thetford around £250,000 per acre over the last few years with a 'normal' range of S106 costs. Therefore, from examination of the results, although in all but one area there is a residual value, in some cases this is potentially below a reasonable sales value to give a sufficient uplift in order for this to be sold.

8.13 Considering the Attleborough Greenfield Extension typology, the model indicates that the residual land value would be significantly lower than current expected land values which gives a residual value of around £65,000 per hectare (£26,300 per acre). This is principally due to the expected high S106 costs (such as education contributions) which are in turn a reflection of the significant infrastructure costs that major expansion would require. There is evidence that land values have recently transacted below the previously expected level in Attleborough (£140,000 per acre gross), with 'normal' S106 costs, although it is clear that the residual values are still below this point.

8.14 Considering the Thetford Greenfield Extension typology, some of the key reasons for the poor viability outcome are that Thetford has the lowest sales value of any location in Breckland, which, combined with higher S106 costs to reflect major infrastructure results in low residual values. Therefore, there is likely to be a need to prioritise S106 resources if development is to take place. In addition, regeneration has the potential to raise land values which will in turn aid the viability of developments.

8.15 A sensitivity analysis utilising alternative sales values of £1,850 per m^2, £4,000 per dwelling S106 costs and affordable housing reduced to 10% indicates that the Thetford Greenfield extension typologies could become viable if land is sold at £186,000 per hectare. However, in order for this outcome to be realised it will require a change to development costs, along with a downward pressure being exerted on land values over time and changes to the Council's requirements for affordable housing and infrastructure costs. It should also be noted that the values included are based upon an assessment in the current housing market and makes no allowances for any changes (either upward or downward) that could occur over time which will impact upon the viability of developments. This

is particularly notable due to the fact that the Attleborough and Thetford Greenfield Urban extensions will be developed out in later phases (the majority post 2021) and could be built out in more 'normal' housing market conditions.

8.16 Furthermore, the viability assessment has also taken into account basic S106 costs rather than the potential for Community Infrastructure Levy (CIL) charges. These could be lower in some areas than S106 contributions as the CIL will be set based on viability.

8.17 In addition to the above, it will be necessary for other funding streams to be brought forward to reduce the pressure on developer contributions to funding infrastructure (e.g. CIL, New Homes Bonus, TIF), and for localised regeneration schemes to be delivered to help raise overall land values. Such measure will be needed to make sure sites continue to come forward for development in the current economic climate. This is discussed in greater detail later in this section.

Analysis

Delivery Timescale

8.18 Having considered the initial results of the assessment it is necessary to do some further analysis on these results. Principally consideration needs to be given to the realistic timescale within which sites can be developed and given consideration to any cumulative effects of developments within a particular market town.

8.19 The decision on when a site was likely to be developed was based upon the yield of the site, reasonable build out rates and any time limiting constraints that were identified during the suitability/ achievability assessment. For the purposes of this assessment build out rates were considered to be at a maximum of 50 units per year, with a constrained maximum of 150 units on any one site in the years 2011-2016 due to the current slow down in house building. This approach has been validated through the SHLAA steering group.

8.20 Tables 7.4 to 7.19 set out the projected site completions in time bands by settlement. These tables are set out below:

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2011 to 2016	2016 to 2021	Post 2021	Grand Total
A01			4,000	4,000
A02			2,374	2,374
A03			1,878	1,878
A04			952	952
A06		347		347
A07		355		355
A09		288		288
A11	134			134

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2011 to 2016	2016 to 2021	Post 2021	Grand Total
A12	63			63
A13	67			67
A15	55			55
A16		34		34
A17	27			27
A18	22			22
A19	20			20
A20	20			20
A21	17			17
A22	9			9
A23		11		11
A24	86			86
Grand Total	520	1,035	9,204	10,759

Table 8.4 Projected Site Completion Dates by Time Band in Attleborough

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2011 to 2016	2016 to 2021	Post 2021	Grand Total
D03	117			117
D04	20			20
D09			600	600
D12		131		131
D13	14			14
D17		304		304
D24	400			400

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2011 to 2016	2016 to 2021	Post 2021	Grand Total
D25		286		286
Grand Total	551	721	600	1,872

Table 8.5 Projected Site Completion Dates by Time Band in Dereham

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2011 to 2016	2016 to 2021	Post 2021	Grand Total
S01	141			141
S02		466		466
S14		27		27
S15			180	180
S17			144	144
S19			218	218
S22	75			75
S24	95			95
S25	10			10
Grand Total	321	493	542	1,356

Table 8.6 Projected Site Completion Dates by Time Band in Swaffham

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2011 to 2016	2016 to 2021	Post 2021	Grand Total
T01			5,000	5,000
T03		12		12
T04	10			10
Grand Total	10	12	5,000	5,022

Table 8.7 Projected Site Completion Dates by Time Band in Thetford

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2011 to 2016	2016 to 2021	Post 2021	Grand Total
W01		16		16
W02	31			31
W04	14			14
W06	81			81
W07	37			37
W09		166		166
W13	135			135
W14			215	215
W15	164			164
W19	63			63
W20	48			48
W22	79			79
W23	22			22
W24	110			110
W25	32			32
W29	11			11
Grand Total	827	182	215	1,224

Table 8.8 Projected Site Completion Dates by Time Band in Watton

Sum of Constrained Capacity	Delivery Timescale	
SHLAA ref	2011 to 2016	Grand Total
EH02	203	203
EH03	267	267
EH05	10	10
EH06	14	14

Sum of Constrained Capacity	Delivery Timescale	
SHLAA ref	2011 to 2016	Grand Total
EH07	28	28
EH10	7	7
Grand Total	529	529

Table 8.9 Projected Site Completion Dates by Time Band in East Harling

Sum of Constrained Capacity	Delivery Timescale		
SHLAA ref	2011 to 2016	2016 to 2021	Grand Total
GE02	10		10
GE03	13		13
GE07	18		18
GE09	11		11
GE10		95	95
GE13	9		9
Grand Total	61	95	156

Table 8.10 Projected Site Completion Dates by Time Band in Great Ellingham

Sum of Constrained Capacity	Delivery Timescale	
SHLAA ref	2011 to 2016	Grand Total
LI03	11	11
LI04	35	35
LI05	8	8
LI07	7	7
Grand Total	61	61

Table 8.11 Projected Site Completion Dates by Time Band in Litcham

Sum of Constrained Capacity	Delivery Timescale	
SHLAA ref	2011 to 2016	Grand Total
MA04	5	5
Grand Total	5	5

Table 8.12 Projected Site Completion Dates by Time Band in Mattishall

Sum of Constrained Capacity	Delivery Timescale	
SHLAA ref	2011 to 2016	Grand Total
NA1	245	245
NA2	134	134
NA4	24	24
Grand Total	403	403

Table 8.13 Projected Site Completion Dates by Time Band in Narborough

Sum of Constrained Capacity	Delivery Timescale	
SHLAA ref	2011 to 2016	Grand Total
NC06	6	6
NC07	47	47
NC08	99	99
NC10	20	20
Grand Total	172	172

Table 8.14 Projected Site Completion Dates by Time Band in Necton

Sum of Constrained Capacity	Delivery Timescale	
SHLAA ref	2011 to 2016	Grand Total
NE02	6	6
NE03	7	7
NE05	18	18

Sum of Constrained Capacity	Delivery Timescale	
SHLAA ref	2011 to 2016	Grand Total
Grand Total	31	31

Table 8.15 Projected Site Completion Dates by Time Band in North Elmham

Sum of Constrained Capacity	Delivery Timescale	
SHLAA ref	2011 to 2016	Grand Total
OB01	5	5
OB03	5	5
Grand Total	10	10

Table 8.16 Projected Site Completion Dates by Time Band in Old Buckenham

Sum of Constrained Capacity	Delivery Timescale	
SHLAA ref	2011 to 2016	Grand Total
SH01	39	39
SH05	17	17
SH12	17	17
SH14	7	7
SH16	60	60
SH32	16	16
Grand Total	156	156

Table 8.17 Projected Site Completion Dates by Time Band in Shipdham

Sum of Constrained Capacity	Delivery Timescale	
SHLAA ref	2011 to 2016	Grand Total
ST01	28	28
ST05	10	10
ST09	12	12
ST10	19	19

Sum of Constrained Capacity	Delivery Timescale	
SHLAA ref	2011 to 2016	Grand Total
ST14	15	15
Grand Total	84	84

Table 8.18 Projected Site Completion Dates by Time Band in Saham Toney

Sum of Constrained Capacity	Delivery Timescale	
SHLAA ref	2011 to 2016	Grand Total
SW03	6	6
SW04	96	96
SW06	133	133
SW11	53	53
Grand Total	288	288

Table 8.19 Projected Site Completion Dates by Time Band in Swanton Morley

Cumulative Effect Constraints

8.21 The results presented give a false picture to deliverability/ developabilty of sites in the district. This false picture is the caused by three key issues: firstly the cumulative effects of development in a particular market town need to be considered. There are identified upward limits for development in some market towns above which the achievability of development becomes distinctly questionable. These need to be factored into the delivery trajectories. Secondly there are some cumulative levels of development that will surpass trigger points for the delivery of key infrastructure, the delivery of this infrastructure will need to be factored into the development timescales. Finally these results only indicate when a whole site could realistically be built out. Clearly it is likely that even on sites that would take many years to develop that some development could start earlier and conversely, some development may place in a later phase. Therefore, there is a possible bias towards development post 2021 when in some cases limited development could come forward on these sites in advance of this date.

8.22 The upward development constraints that have been identified for particular settlements are set out in table 7.20 below:

Market Town	Upper Development Level	Explanation of Constraint
Thetford	5,000	Thetford is surrounded by a number of protected European Habitats (SPA and SAC), and evidence reveals that development may adversely affect these sites. As as result, there is a narrowly defined area of Thetford within which development can take place without having an adverse impact on European site. Within this area, there are also other particular site-based constraints and physical features which mean that the developable area is restricted. Therefore,

Market Town	Upper Development Level	Explanation of Constraint
		the upper level of development of 5,000 dwellings is the expected maximum that can likely be delivered at a density that would be compatible with the location.
Dereham	600	High school capacity is severely constrained in Dereham. Both of the town's existing high schools are landlocked and have limited room to expand. The necessary availability of land (6,000 homes) has not been identified to justify a new school and there are no clear solutions for the relocation of an existing school that are considered reliable. Furthermore, waste water treatment capacity is severely constrained in Dereham and there is only sufficient capacity to accommodate 600 dwellings which accords with the Core Strategy and the Water Cycle Study evidence. Therefore, the upper level of development for the purpose of this assessment has been limited to the anticipated expansion capacity of Dereham's existing high schools and waste water treatment network.

Table 8.20 Fundamental Upward development constraints in Market Towns

Time-Limiting Constraints

8.23 In addition to these fundamental upward limits on development constraints there are also a number of settlement and site specific constraints that may have a time limiting effect if not a fundamental constraint on the ability to develop a site. These factors have already been included into individual development sites where the yield of that site would exceed the relevant threshold. However, such constraints also need to be factored into development trajectories in respect of the effect of cumulative sites coming forward for development. Future iterations of the document and additional evidence base will help to refine the assessment of time-limiting constraints. The time limiting constraints identified for particular settlements are set out in table 7.21 below:

Location	Development Level	Explanation of Constraint
Attleborough	400	The existing gyratory system in the centre of Attleborough is showing signs of significant stress. The indications at this moment are that development levels in Attleborough in excess of approximately 400 units would significantly worsen this problem to the point of making the town unsuitable for further development. The identified solutions to this problem comprise the provision of a new distributor road from the A11 to the south of the railway and review and improvements to the town's gyratory system. These solutions have both a time and cost implication and this will need to be factored into development proposals. For the purposes of this assessment it is not considered that development can come forwards at levels in excess of 400 significantly before 2014.

Table 8.21 Time-limiting constraints by location

8.24 Therefore the revised housing potential estimations indicates that in Attleborough 400 homes can be built prior to 2016. In Dereham, capacity has been reduced to an upper limit of 600 homes. Therefore, overall in Breckland's market towns capacity has been reduced by 1,414 to a total of 20,714 homes, the majority of the

reduction occurring in Attleborough. The revised figures taking into account the fundamental uppward development limits and time limiting constraints are expressed in the table below. The adjusted figures can be seen within brackets.

	Timescale			
	2011-2016	2016-2021	Post 2021	Total
Attleborough Total	**520**	**1,035**	**9,204**	**10,759**
Attleborough Constrained Total	(400)			(10,639)
Dereham Total	**551**	**721**	**600**	**1,872**
Dereham Constrained Total				(600)
Thetford Total	**10**	**12**	**5,000**	**5,022**
Thetford Constrained Total				(5,000)
Rest of Breckland Total	2,948	770	757	4,475
Breckland Grand Total				**22,128**
Breckland Constrained Total				(20,714)

Table 8.22 Constrained capacity in Attleborough, Dereham, Thetford and Breckland

Housing Projections

8.25 Having taken account of the upper limit constraints and the time limiting constraints it is necessary to consider whether development can begin on some sites before the timescale in which they can be reasonably completed. On this basis housing projections have been constructed across the three time periods. In the construction of these projections consideration has been given to the revised constrained settlement yields, any time limiting factors and the likely build out rates, as described above.

8.26 The build out rates were created on the basis of a single developer building out the site. Clearly with very large sites it is likely that the site would be sold off in parts allowing for more than one developer to work on a particular site. For the purposes of the projected housing trajectories within this assessment it has been assumed that there will be one developer for every 500 houses on a particular site. In terms of this assessment it means 8 developers will be assumed for A01 and 12 for T01. Using this assumption the build out rates are broadly in line with the estimates in the Thetford Growth Framework and Infrastructure Study, and therefore this rationale is considered reliable.

Analysis

8.27 From past analysis of the housing market within Breckland, it has been possible to make a number of assumptions. The assumptions have included that the maximum number of dwellings an individual development will build will be 500 units, with an upper limit of 50 dwellings per year. For sites A01 and T01, this has meant that 8 and 10 developers will build out the sites respectively, with each of these developers completing 50 units per annum.

Market Towns

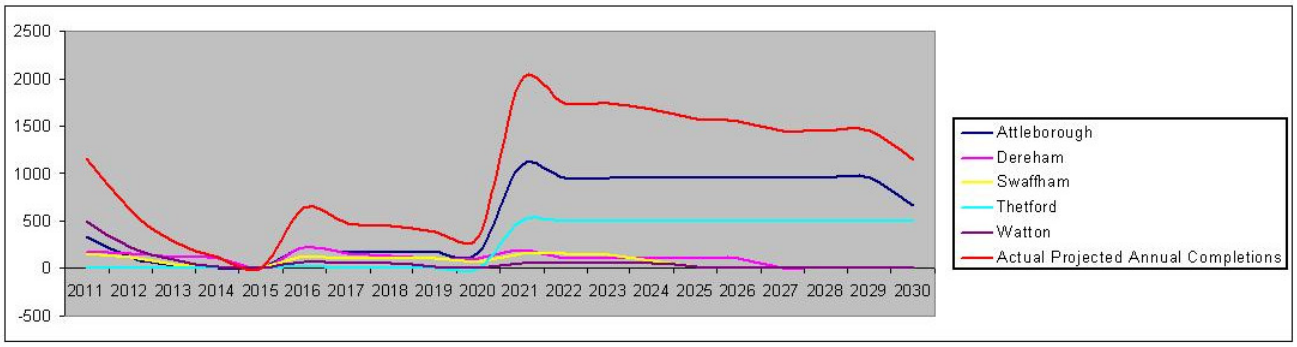


Figure 8.1 Housing Projections for Market Towns

8.28 Figure 8.1 'Housing Projections for Market Towns' demonstrates that there are large variations in the annual projected completions over the period 2011 to 2030, with a peak of completions of just under 2,000 dwellings in 2021. This higher rate of projected housing completions is comprised of the end of the middle phase of development and the start of the final phase. Annual completions remain high throughout the third phase of delivery as the two largest sites in the District (A01 in Attleborough and T01 in Thetford) come on stream.

8.29 It is possible to see that following the initial higher rates of delivery during the first phase of projected completions, by 2015 housing delivery has stalled. This is partially due to capacity constraints within the individual market towns infrastructure. For instance, capacity within Attleborough is constrained by the town centre gyratory system, whilst within Dereham it is constrained by capacity within the towns two High Schools, both of which are landlocked.

8.30 As has already been noted, housing delivery within Attleborough is relatively stable over the first 10 year period, with an average of just under 140 units being projected to be completed per annum. There is a step change in housing delivery in 2021 which could see projected completions average at 1,626 units per annum, when site A01 starts being developed. Projected housing completions for the town will then start to decline. Capacity within the town centres gyratory system has previously been mentioned for the fluctuations in the projected housing delivery rate. From 2021 a new link road will connect the A11 to the B1077 to the south of the town. This will allow a greater number of sites to come forward.

8.31 This housing delivery would also be dependant upon the delivery of key social infrastructure in addition to the physical road infrastructure already identified. The phasing of the delivery of such infrastructure may mean that housing delivery is delayed until a later date, although early indications indicate that the timescale set out in the housing projections is not unrealistic.

8.32 Figure 8.1 'Housing Projections for Market Towns' displays a markedly different set of housing projections for Dereham than it did for Attleborough. Housing delivery is relatively stable across the time period, until 2026 when projected housing completions end. However the projected housing delivery rate is much lower than for other town. As has already been mentioned this is partly due to capacity within the towns high schools.

8.33 The projected housing delivery for Swaffham shows signs of similarity with that of Dereham, however the first phase of projected completions ends more quickly than for Dereham. Further to this, each of the deliverable sites can be completed by 2025. Development within Swaffham is constrained by capacity within the existing waste water treatment works. Strategic solutions will be needed to see further increases in housing capacity within Swaffham.

8.34 There is limited potential within the housing projections for Thetford between 2011 and 2021. This incorporates the first two delivery phases. From 2021 site T01 will come on stream and this site alone sees 500 dwellings per annum projected to be completed. Housing growth within Thetford is severely restricted, to just the North of the town, due to the implications of the Stone Curlew Buffer Zone, which was dedicated from the Habitat Regulations Assessment of the Core Strategy and Development Control Policies DPD. There is potential for site T01 to see delivery begin earlier then 2021, due to it being owned within two ownerships, and the likelihood of an imminent planning application.

8.35 As with Attleborough there are a number of necessary improvements to physical and social infrastructure that will need to accompany significant development within the town. It is not anticipated that the delivery of these key pieces of infrastructure will constrain the potential delivery rates that are identified. However, if there are delays in the delivery of this infrastructure there would be a knock on effect on the potential housing delivery rates.

8.36 Watton has a relatively high capacity for housing within the first three years, with an average capacity of 270 new homes per annum over this period. This decreases rapidly from 2016 until capacity is exhausted in 2025. There is only limited quantum's of land available for development within Watton. Furthermore, there are only limited employment opportunities within Watton, which constrains the ability for future development within the town.

Local Service Centre Villages

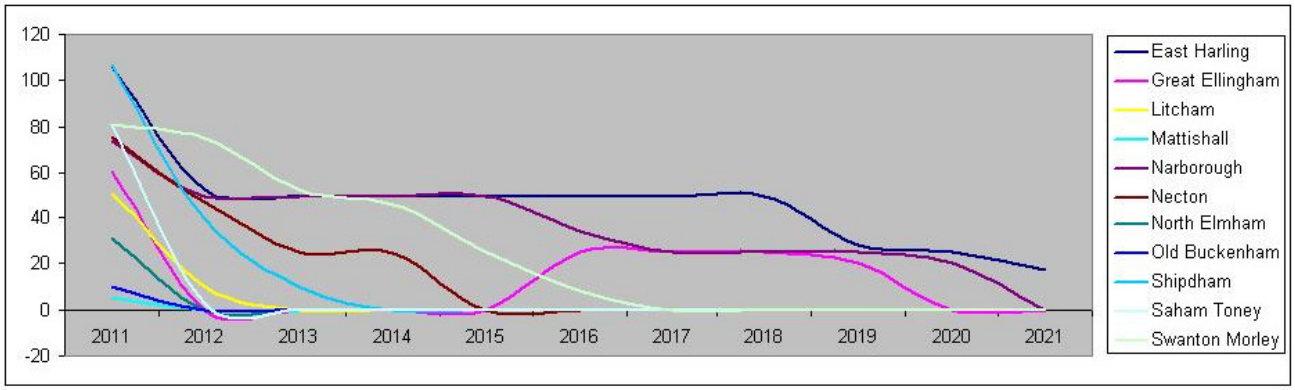


Figure 8.2 Local Service Centre Housing Projections

8.37 Land supply per annum has also been analysed for the Districts Local Service Centre Villages. This is shown within Figure 8.2 'Local Service Centre Housing Projections'. Housing delivery within the Local Service Centre Villages is constrained by infrastructure provision , as it is within the towns. The housing projections shown above, are constrained over a much shorter period than for the market towns due to the limited amount of land available within the Local Service Centre Villages.

8.38 Figure 8.2 'Local Service Centre Housing Projections' shows a trajectory which is relatively similar for a number of Local Service Centre Villages. These are notably Shipdham, Saham Toney, Litcham, North Elmham, Old Buckenham, and Mattishall. Each of these villages have their highest rate of projected housing delivery in the first year, after this point their is no further projected housing completions over the trajectory. For the purpose of Figure 8.2 'Local Service Centre Housing Projections', a different delivery rate has been assumed for the Local Service Centre Villages than for the Market Towns. This equates to an individual developer in a Local Service Centre village site being able to develop at a maximum rate of 25 units per annum. It is this development rate which has lead to the majority of sites within the villages being delivered within the first phase. It is possible however that the projected delivery rate could be slower due to market conditions.

8.39 Narborough and East Harling both display the potential for a more stable rate of housing delivery over a five year period. Within both of these villages there are a larger number of deliverable sites available, and furthermore these sites have a larger capacity. For a few of these sites, this has meant that their delivery has had to be phased for longer than five years.

8.40 Great Ellingham displays a different trend to the other Local Service Centre Villages. Although the first phase of sites are projected to be completed quickly, there is a second phase which is projected to commence in 2016. The second phase is formed from site GE10, with the lead in time for which relating to the requirement to provide improved highways infrastructure.

Housing Projections

8.41 As can be seen in the above tables, the majority of sites identified in Local Service Centres could be commenced and completed within the first five year period. The build out rates used were created on the basis of a single developer building out the site at 25 dwellings per annum. However, with very large sites it is likely that the site would be sold off in parts allowing for more than one developer to work on a particular site. It has been assumed for the purposes of this assessment that individual sites will deliver an average of 50 units per annum with a constrained maximum of 150 units in the years 2011-2016 due to the current slow down in house building.

8.42 The overall results of the assessment indicate that a significant number of sites identified as being suitable, achievable and viable could be delivered between 2011 and 2016. Due to the comparatively small size of sites compared to those identified in the market towns, the majority of Local Service Centre sites would be completed over a single phase of the plan period rather than requiring a longer build-out time frame.

8.43 Having made some projections about the delivery of housing it is possible to illustrate the potential delivery of housing over time. For the purposes of this illustration it has been assumed that delivery rates can simply be averaged over the first 5 year time period, with subsequent period being assessed on the basis of the number of sites coming forward and their expected build out rates.

Combination Funding and Alternative Funding Sources

8.44 In considering the viability assessment, land value is not the only potential sensitivity test that needs to be considered. For the purposes of this assessment it has been assumed that a particular development site will need to pay for all of the associated “abnormal costs”. The use of the HCA viability model aggregates parcels of land by typologies specifically to allow sites to be combined so that a more accurate picture of the cumulative impact of development can be considered. Further, there may be also be infrastructure costs that would not be funded through the planning system such as strategic improvements to water infrastructure through Anglian Water's AMP programme which development will not directly contribute to. If alternative sources of funding can be identified then there is the potential to improve viability through the reduction of the level of investment needed directly from development.

8.45 Although outside investment can overcome viability issues it is not without knock-on effects. In particular, external funding sources may need a significant lead-in time for funding to be secured and then development to be carried out, this may cause significant delays in terms of the realistic timescale in which development could come forward and would be a form of time-limiting constraint. The identified upgrades to a particular piece of infrastructure may also not improve the environmental or infrastructure capacity of settlements and this may have the effect of allowing development in the short term but ultimately capping overall development levels.

8.46 Another consideration is the potential to spread infrastructure costs across a number of sites aggregating contributions on a per dwelling basis through mechanisms such as tariffs. This approach means that an individual sites ability to fund the required infrastructure is not the key issue, as it will be whether the overall level of development possible in one particular area can fund the necessary infrastructure. At the time of writing, Breckland Council has committed to preparing a Community Infrastructure Levy (CIL) for the District. Therefore, future iterations of the SHLAA will ultimately look towards CIL payments as part of the assessment of deliverability.

8.47 Therefore, as discussed above it is possible that a combination of alternative funding and cost spreading will be required to ensure deliverability in the urban extensions to Attleborough and Thetford to generate a sufficient residual land value in order for these to come forward.

Conclusions

8.48 Notwithstanding the imposed the fundamental upper development level constraints to Attleborough and Dereham, significant land with the potential for housing has still been identified in the Towns and Local Service Centre villages.

8.49 In total 100 sites were identified where development was considered achievable and where development on the was considered suitable and achievable. These 100 sites had the capacity to yield 22,128 houses of which, it has been estimated, 6,567 could realistically be built over the period 2011-2021. However, in reality the large scale developments will have the majority of completions beyond 2021 and could be up to 2031.

8.50 Therefore, of those 22,128 houses it is estimated that 4,029 could be built in the period 2011-2016, 2,538 built in the period 2016-2021 and the remaining 15,561 developed post 2021. Average potential annual building rates were generally in the lower hundreds with a peak of over 1,500 units from 2021 where there was a combination of late stage sites coming “on-stream” just before early stage sites ran out of capacity. Build rates began to slow post 2026 and gradually declined until 2031 when the last of the identified sites was estimated to be built out. However, it should be noted that these figures reflect an unrestricted planning regime and give an indication of what could happen if all 'deliverable' sites were to come forward.

8.51 In the short term key constraints to the delivery of housing in the market towns are anticipated to be the slow down in the housing market and highways and waste water constraints in Attleborough. In the medium term, the sites that have been identified with the potential for housing in Watton are exhausted, sites in Dereham cease to be suitable due to the constrained high school capacity and sites in Swaffham are held up by necessary upgrades to the water supply network which are not anticipated to be completed before 2019. In the long term the principal constraint is the exhaustion of identified site capacity, and in Attleborough reaching the anticipated upper limits of the existing electricity network.

9 Combined Housing Land Supply, incorporating 5 Year Housing Land Supply

9.1 Guidance issued by the Department for Communities and Local Government in relation to demonstrating a 5 year supply of deliverable sites states that:

'Unallocated brownfield sites may be included in the 5 year land supply of deliverable sites, but only where the Local Planning Authority is satisfied, having considered the particular circumstances of the specific site, that the site will meet all the tests of deliverability in paragraph 54 of PPS3 and will make a significant contribution to the delivery of housing during the relevant 5 year period.'

9.2 Therefore, in light of the findings of the SHLAA it is considered that those brownfield sites identified as being suitable, achievable and viable in the first 5 year period are added to the Council's existing 5 year land supply figures to produce a composite land supply which fulfils the expectations of CLG guidance. This results in the addition of the following sites to the current 5 year land supply position:

SHLAA Site Ref	Address	Delivery Timescale	Constrained Capacity
T04	Cottage Hospital, Thetford	2011 to 2016	10
A17	Former Storage Buildings, Slough Lane, Attleborough	2011 to 2016	27
A12	Food Processing Factory, Buckenham Road, Attleborough	2011 to 2016	63
A24	Hamilton Acorn Factory, Attleborough	2011 to 2016	86
D04	Redevelopment of dwelling, Dumpling Green, Dereham	2011 to 2016	20
W07	Land at Merton Road, Watton	2011 to 2016	37
		Total	**243**

Table 9.1 SHLAA sites to be included in 5 year land supply

Composite Five Year Land Supply

	2011/12	2012/13	2013/14	2014/15	2015/16	Total
Large Sites	191	362	418	343	165	**1,479**
Small Sites	243	237	0	0	0	**480**
SHLAA PDL sites	0	92	65	57	29	**243**
Total	**434**	**691**	**483**	**396**	**194**	**2,198**
Requirement	946	946	946	946	946	4,730
Shortfall/ Surplus	**-512**	**-255**	**-463**	**-550**	**-752**	**-2,532**

Table 9.2 Composite Five Year Land Supply

10 Testing and Review

10.1 The assessment has identified a sufficient quantity of sites to deliver the first 10 years growth in the plan period based upon the Council's latest annual residual requirements. Therefore, the SHLAA does not require any further review due to insufficient sites, and it is considered that it will be updated in the Council's next AMR.

10.2 The SHLAA will be reported on annually as part of the Council's Annual Monitoring Report (AMR) to support the updating of the housing trajectory and the five year supply of deliverable sites.

Appendix A Normal Costs Associated with the Residential Development of a site.

A.1 Normal costs

- Associated Site Acquisition Costs (Professional Fees, Legal Costs, Stamp Duty etc) - 5.5% of Land value
- Building Costs - £970 - £1,075 per m^2
- Reasonable Servicing Costs (per m^2 basis) to include:
    - Roads (on-site)
    - Sewers (on-site)
    - Civil Engineering
    - Minor Highway Improvements (off-site)
    - Surface Water Drainage
- Overheads
- Development Finance - 7.5%
- Return for Developer - Assumed as 20%

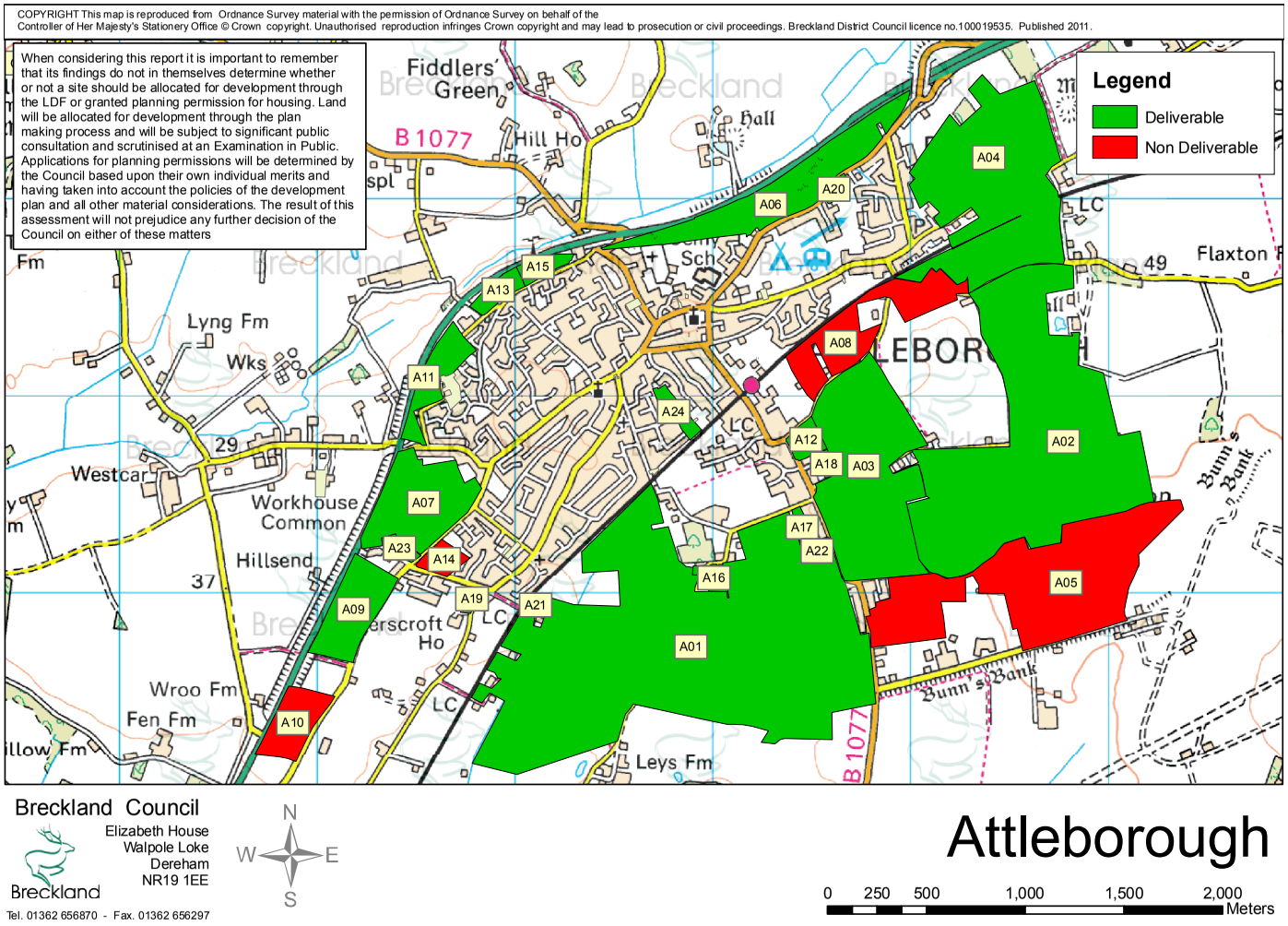
A.2 Affordable Housing is included as a separate entry in the viability model, and as such is not otherwise included in the S106 costs per dwelling figures.

A.3 S106 Costs

- Open Space
- Education Contributions (Excluding capital build costs for new schools)
- Library Provision (Excluding capital build costs for new library buildings) - £60 per dwg
- Fire incl. Hydrants
- Transport/Cycling/Walking Strategies
- Monitoring

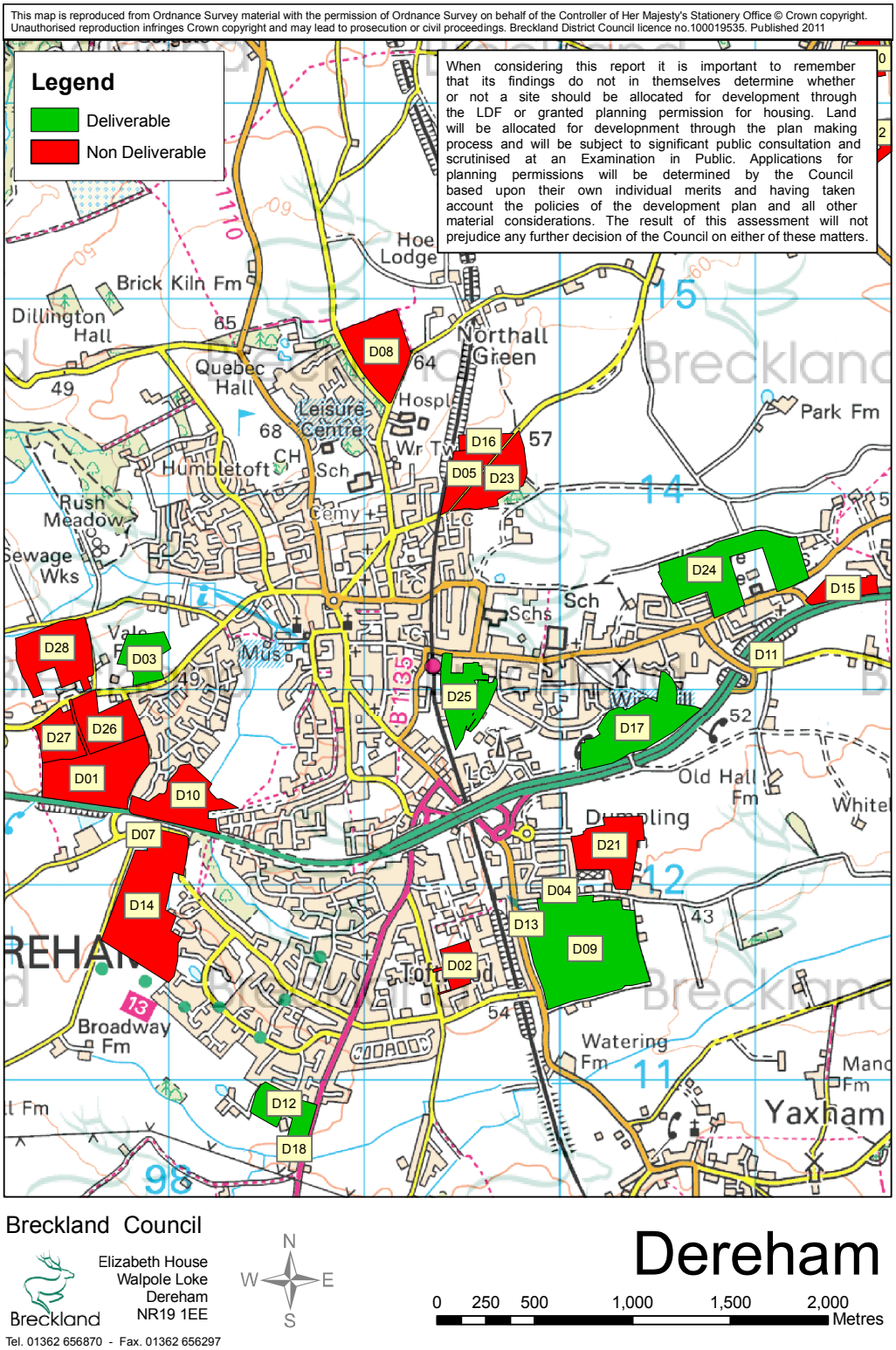
Appendix B Site Maps

Attleborough



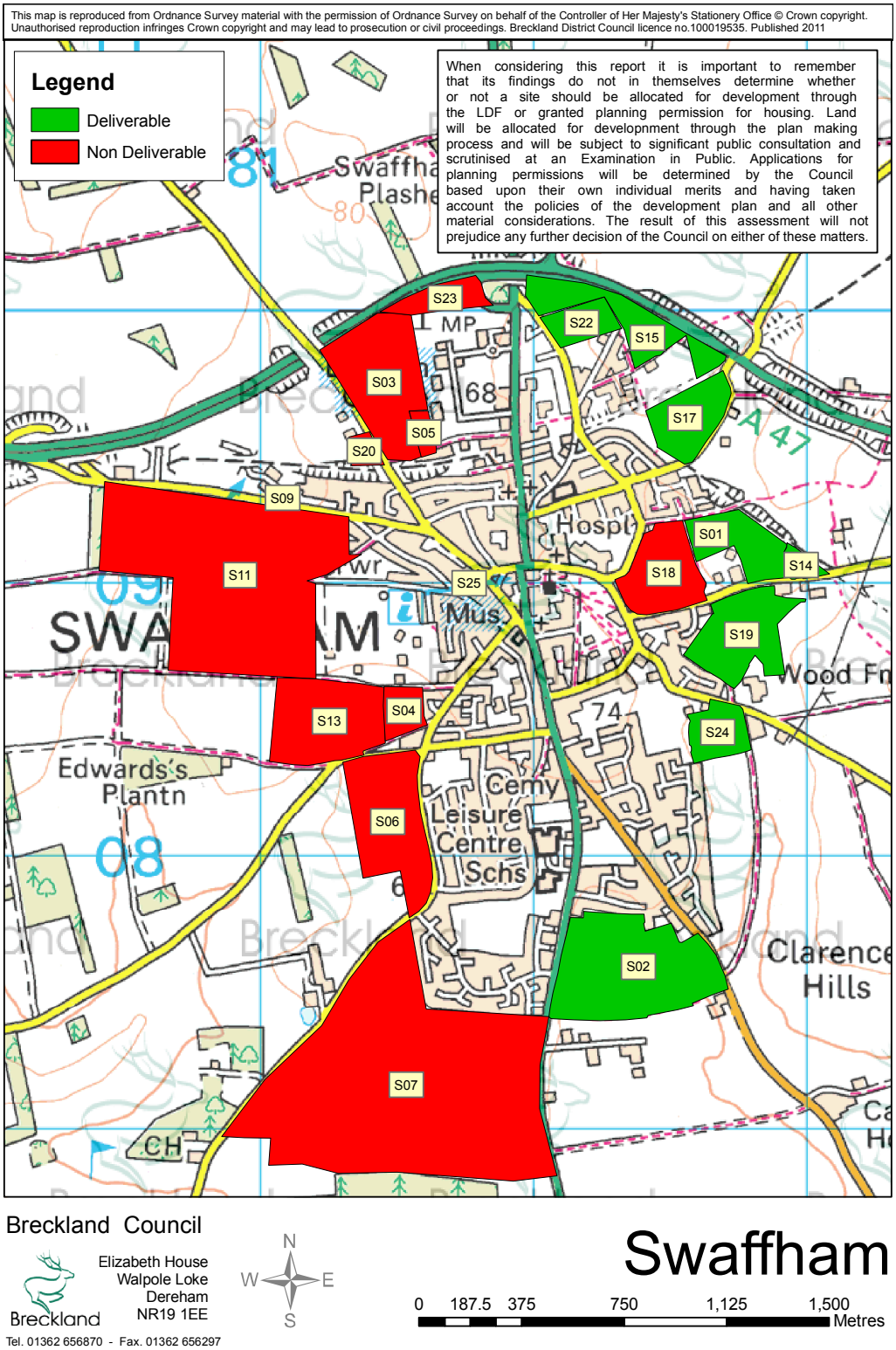
Map B.1 Attleborough

Dereham



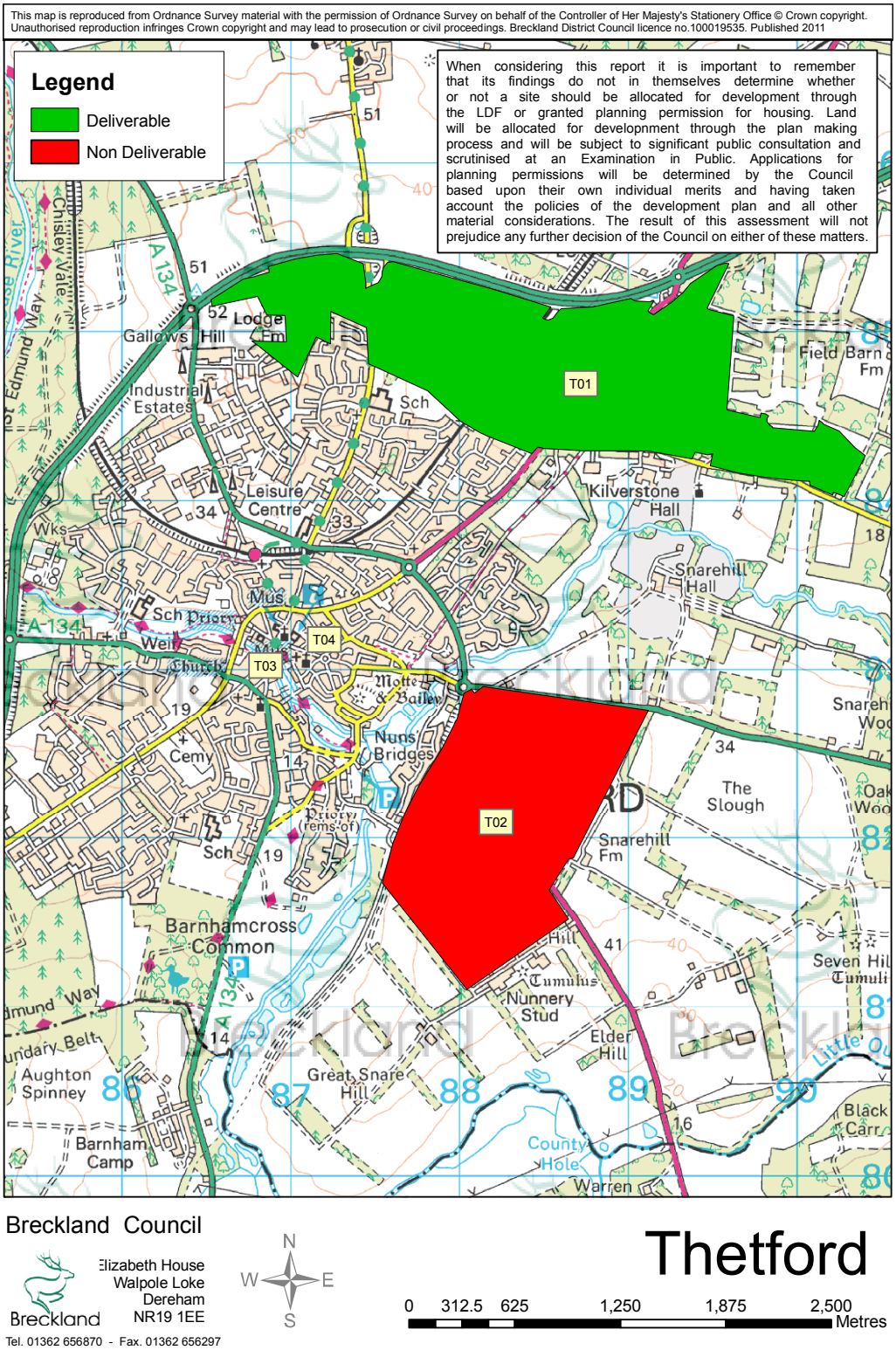
Map B.2 Dereham

Swaffham



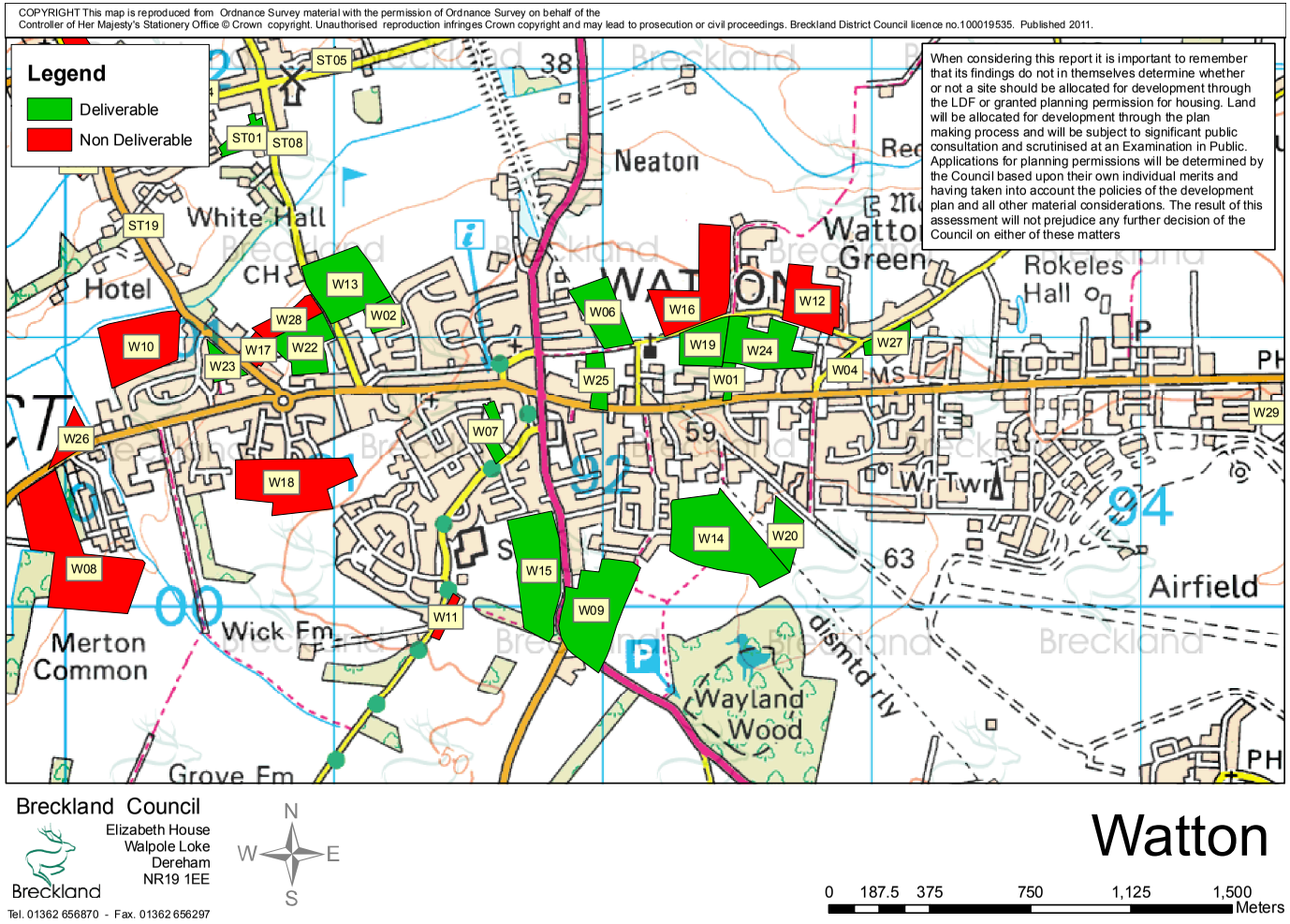
Map B.3 Swaffham

Thetford



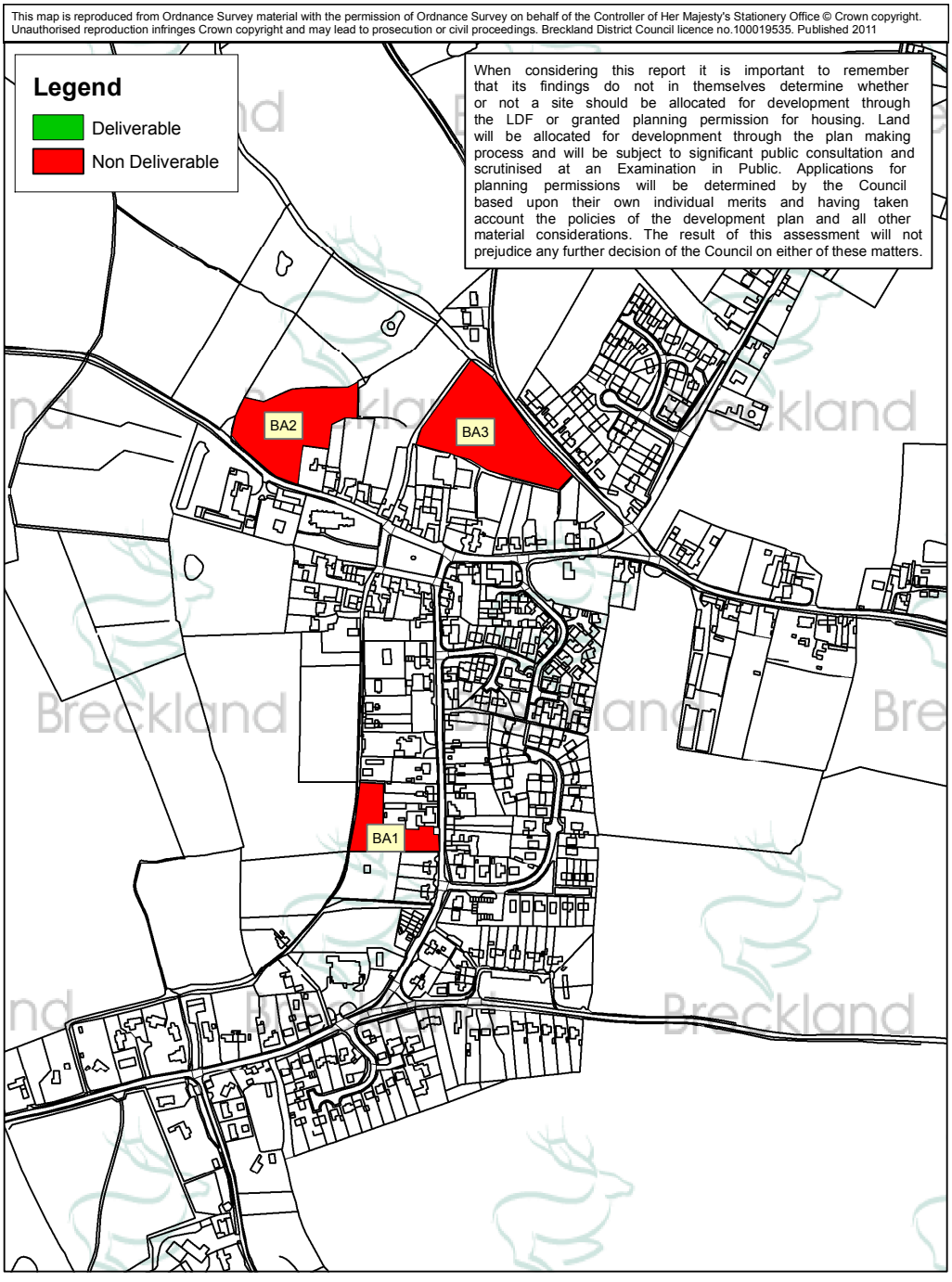
Map B.4 Thetford

Watton



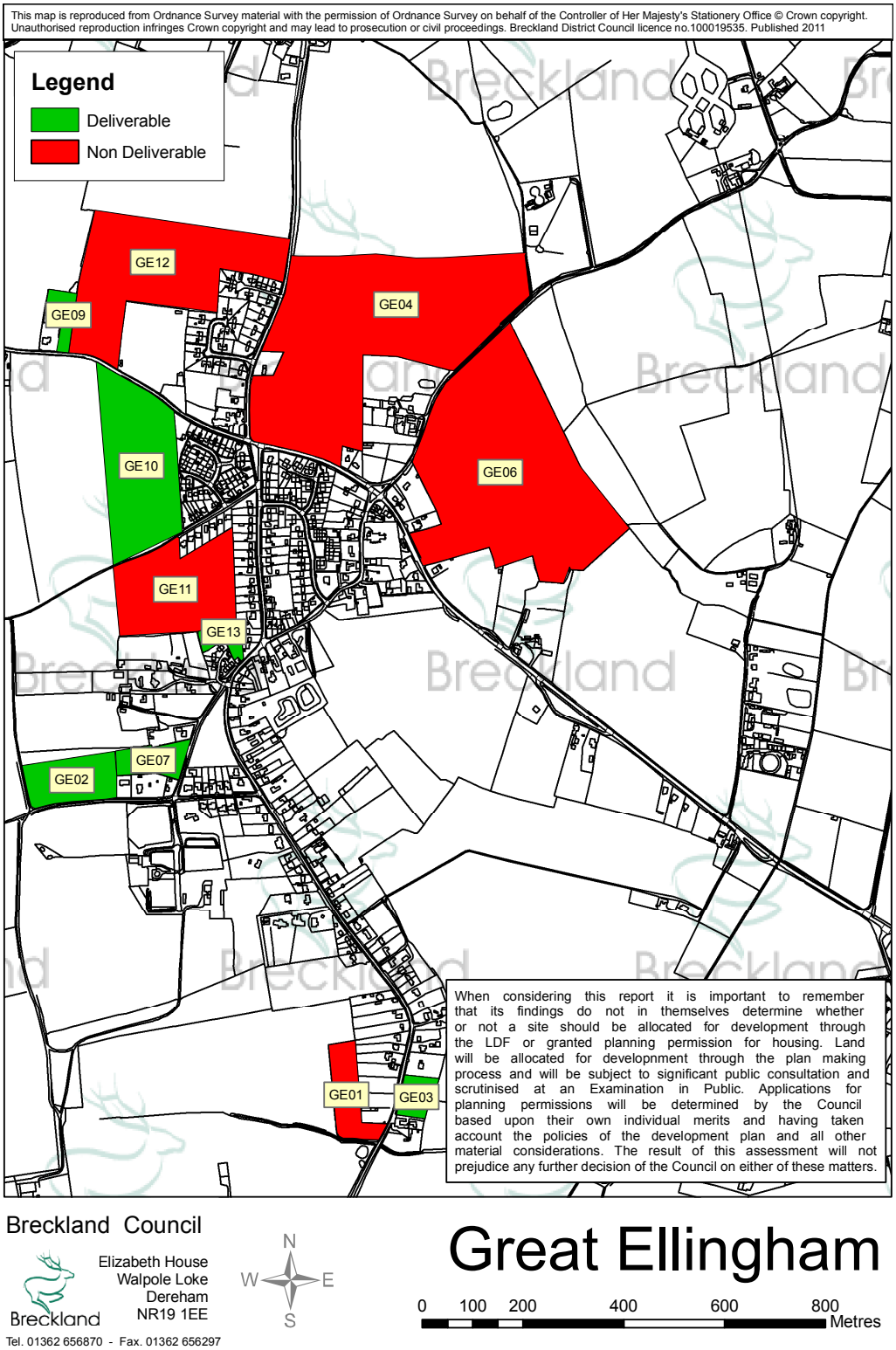
Map B.5 Watton

Banham



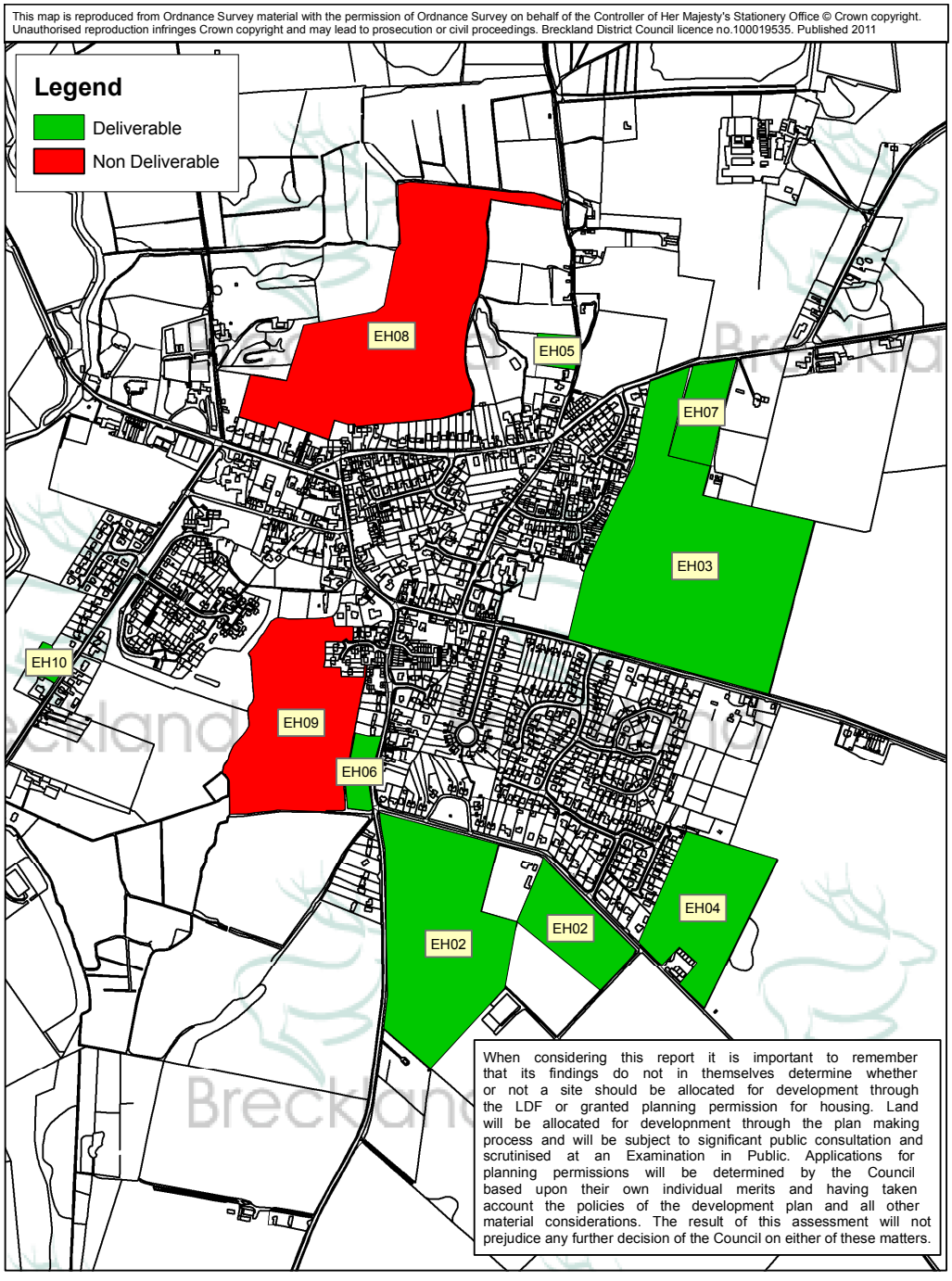
Map B.6 Banham

Great Ellingham



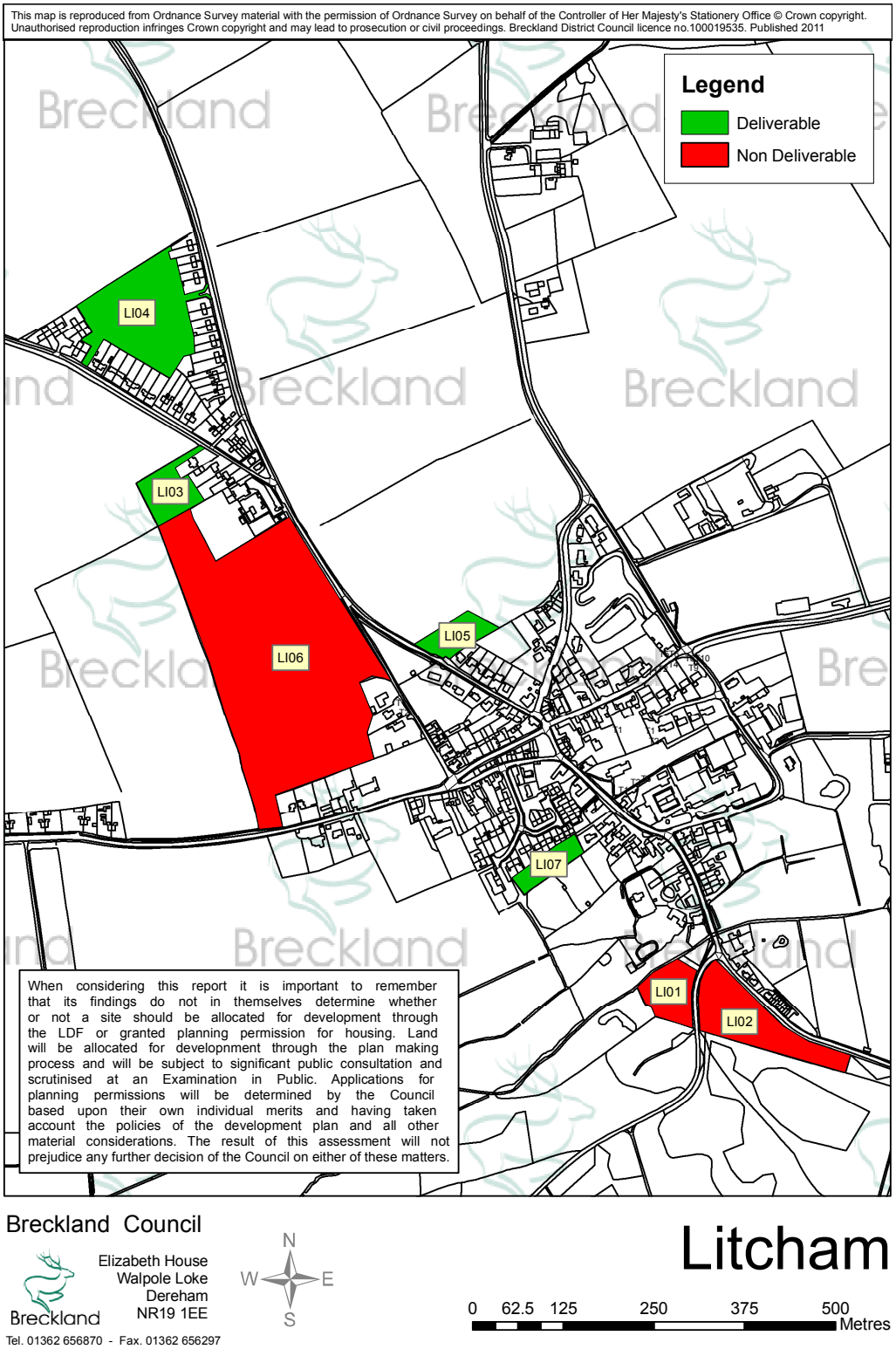
Map B.7 Great Ellingham

Harling



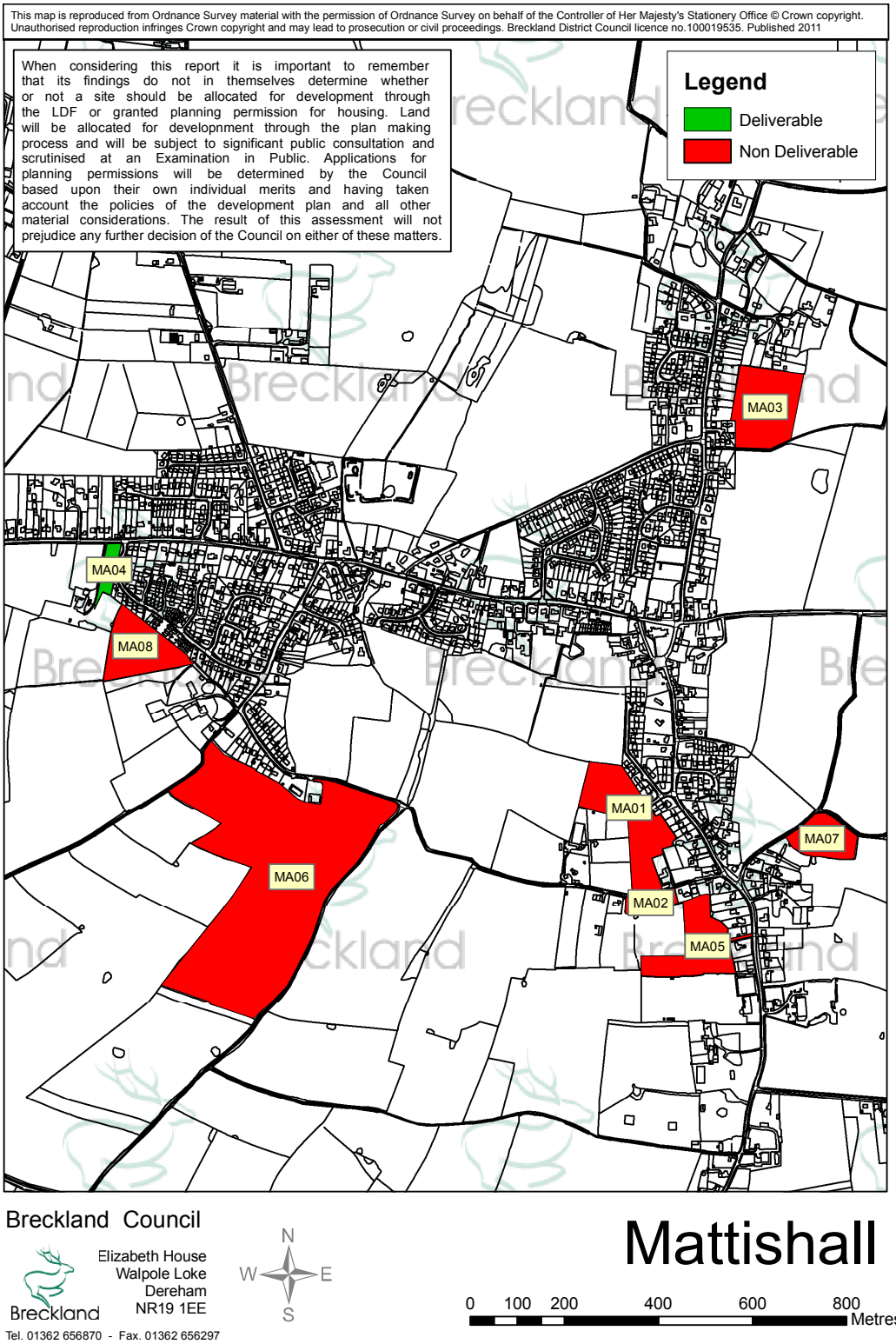
Map B.8 Harling

Litcham



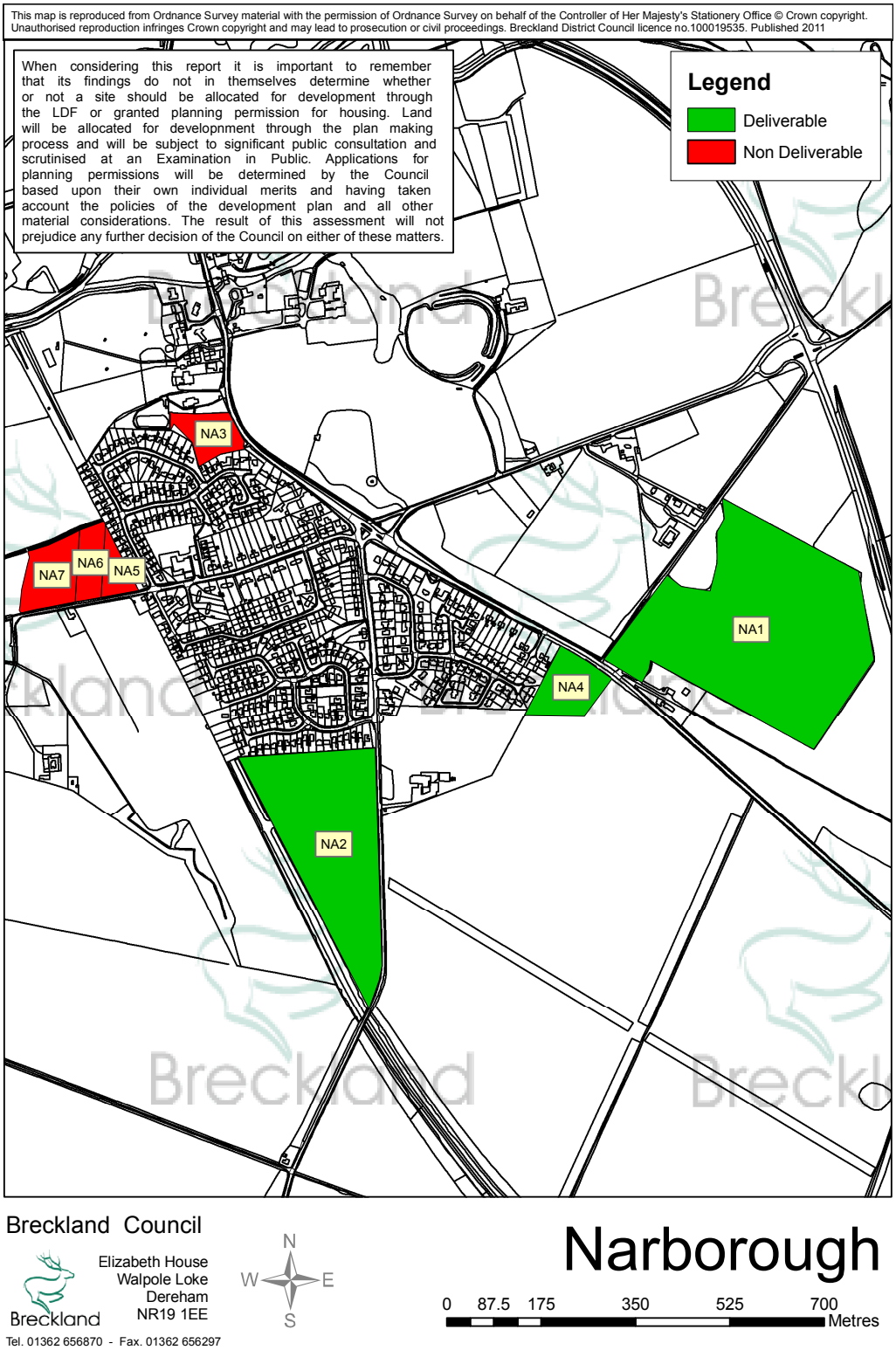
Map B.9 Litcham

Mattishall



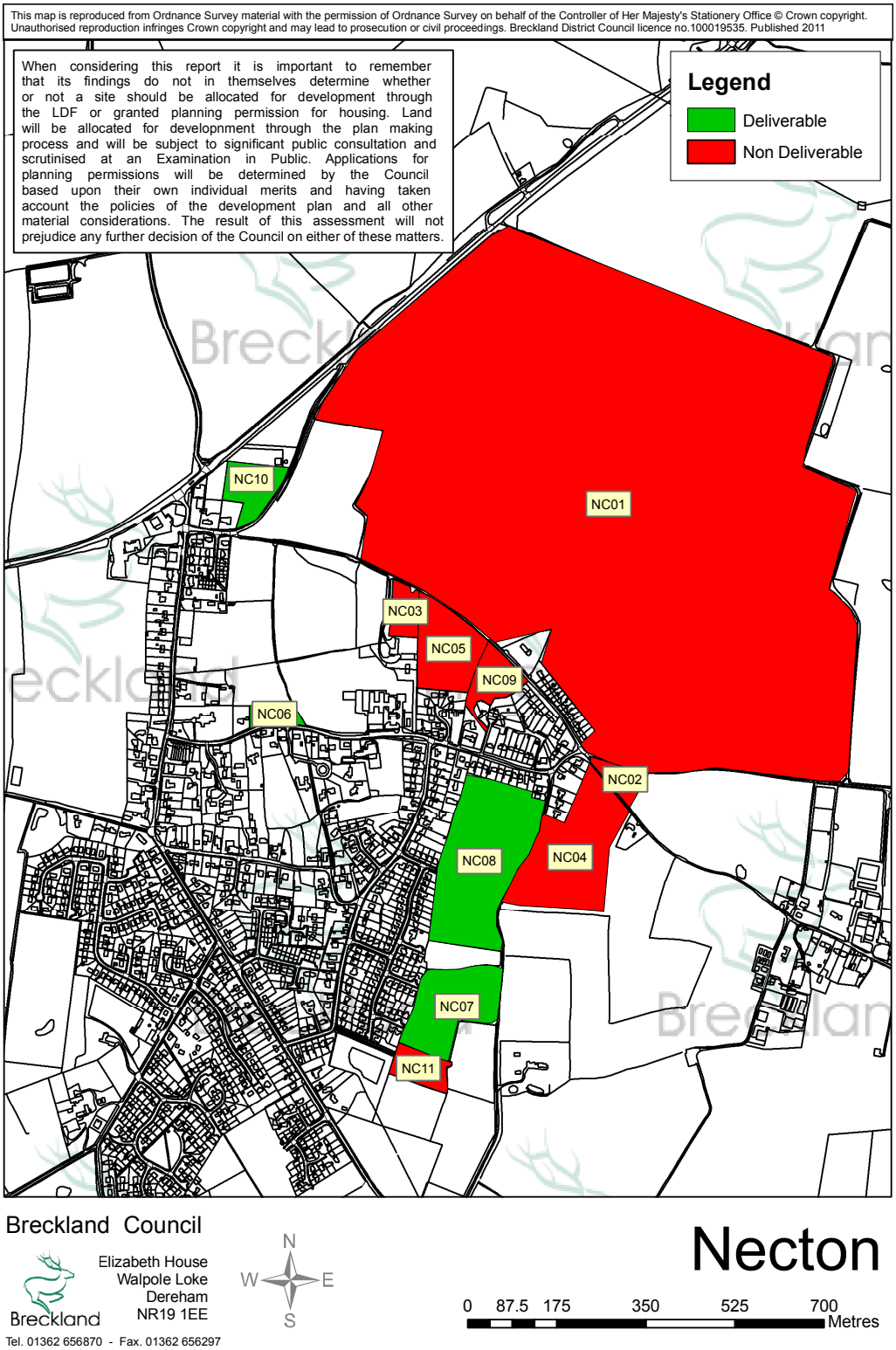
Map B.10 Mattishall

Narborough



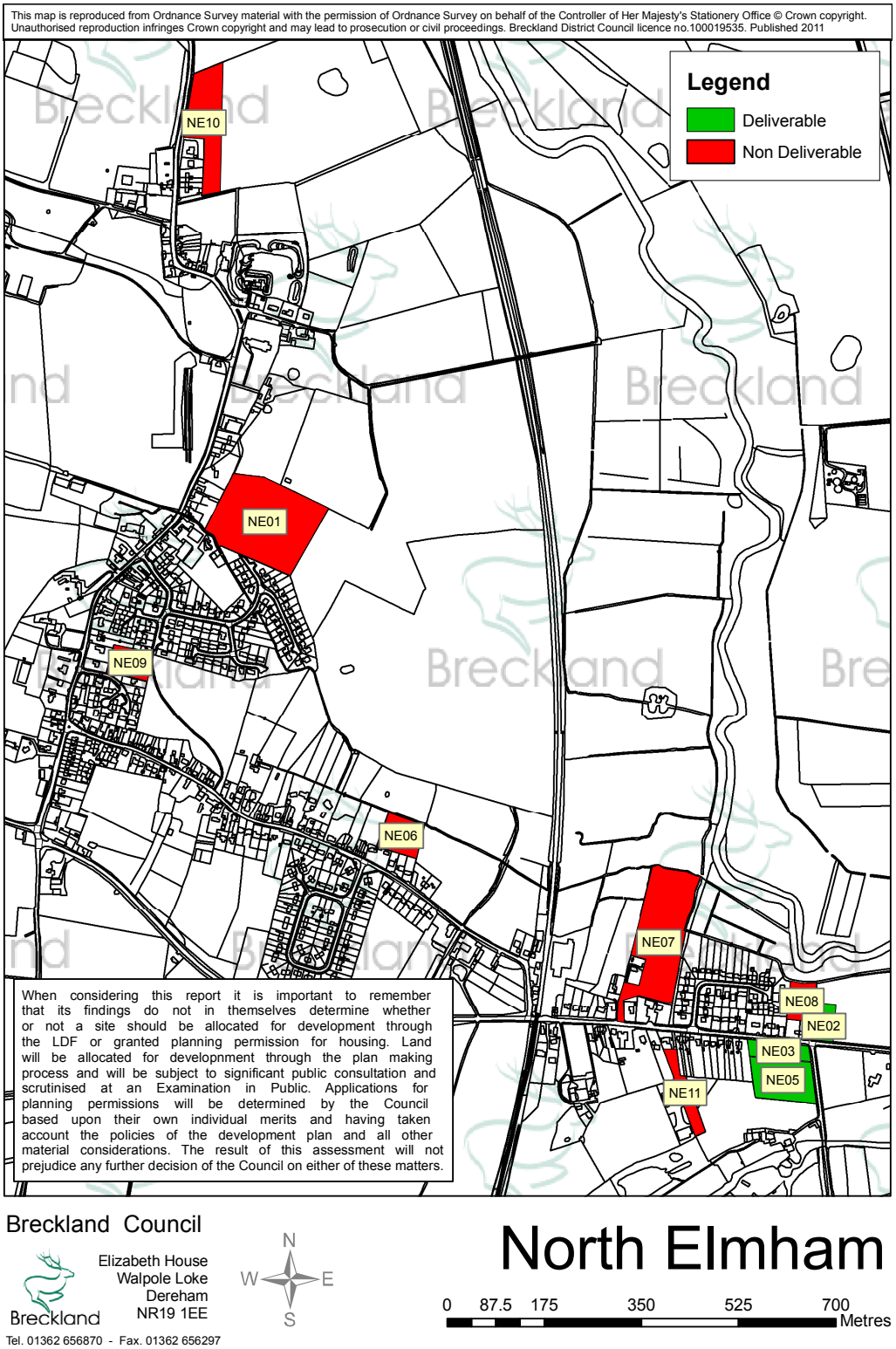
Map B.11 Narborough

Necton



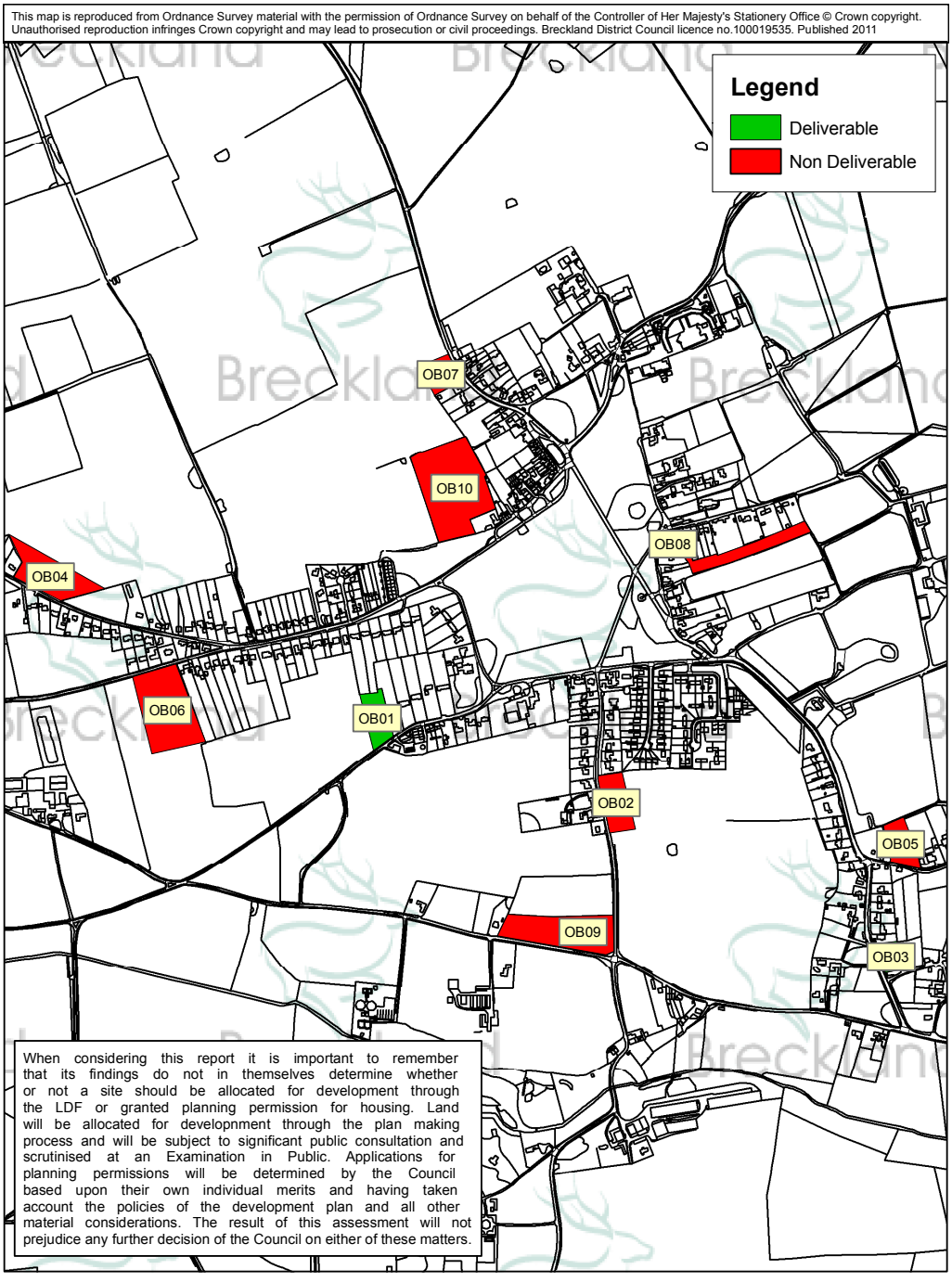
Map B.12 Necton

North Elmham



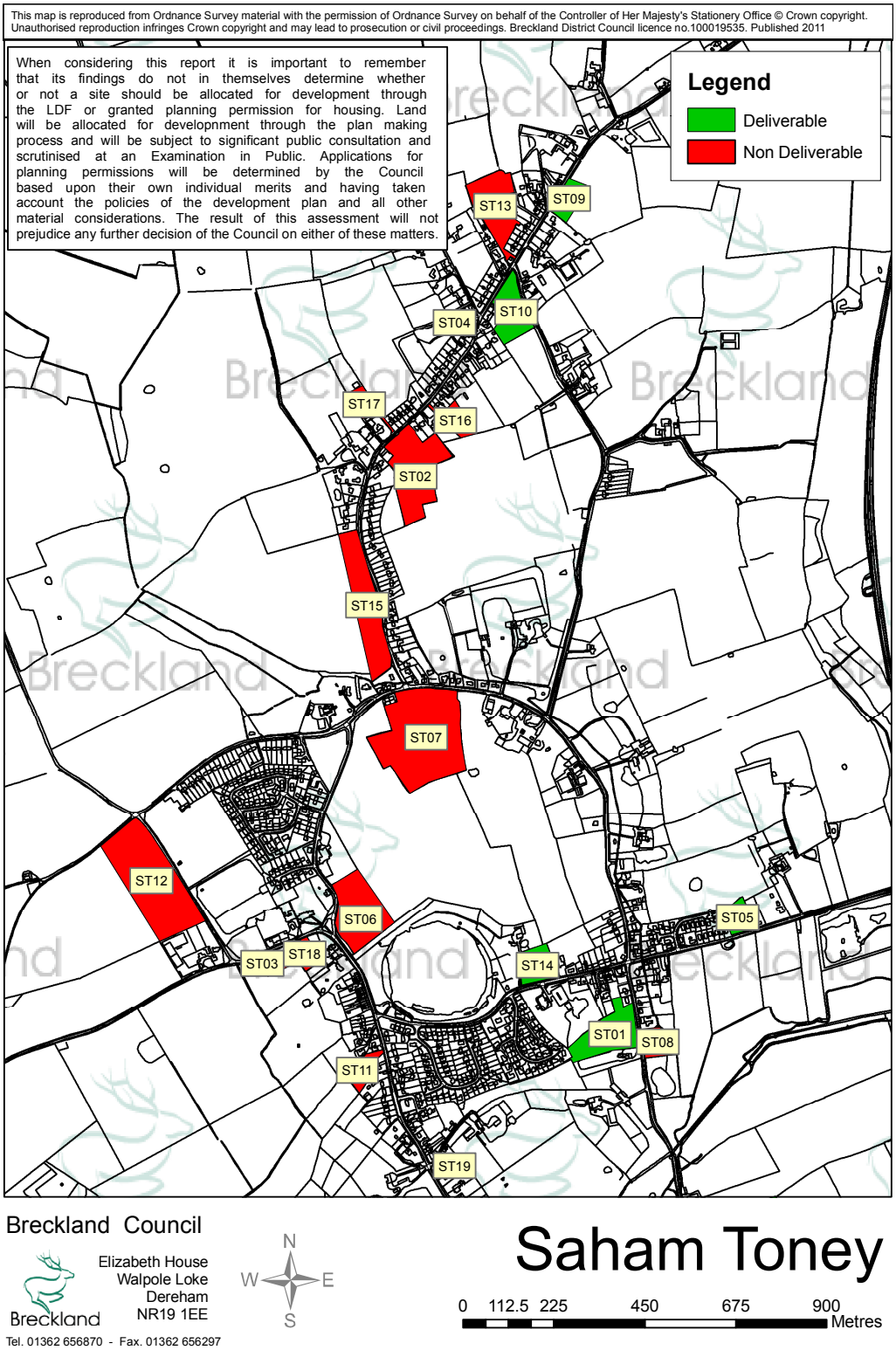
Map B.13 North Elmham

Old Buckenham



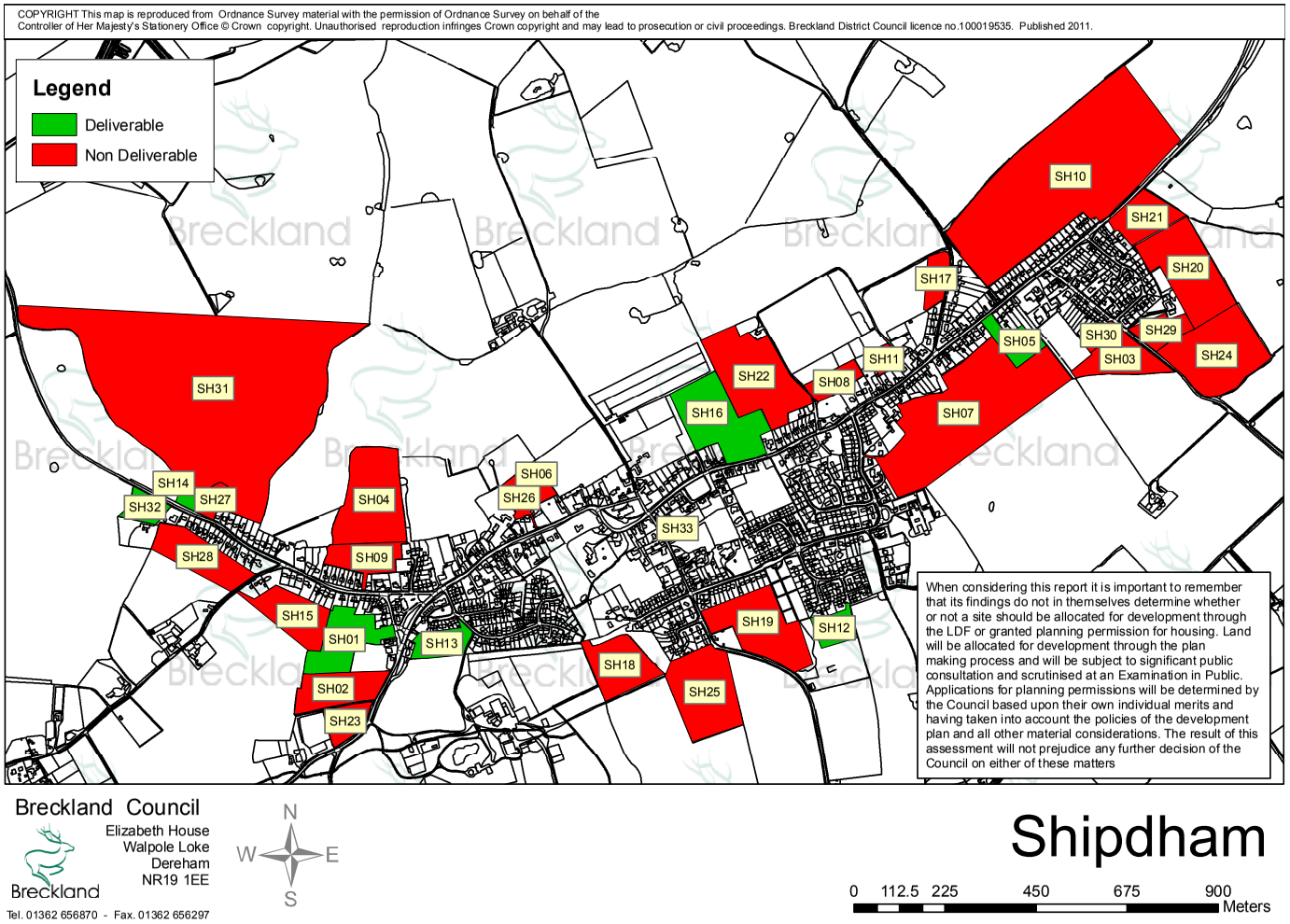
Map B.14 Old Buckenham

Saham Toney



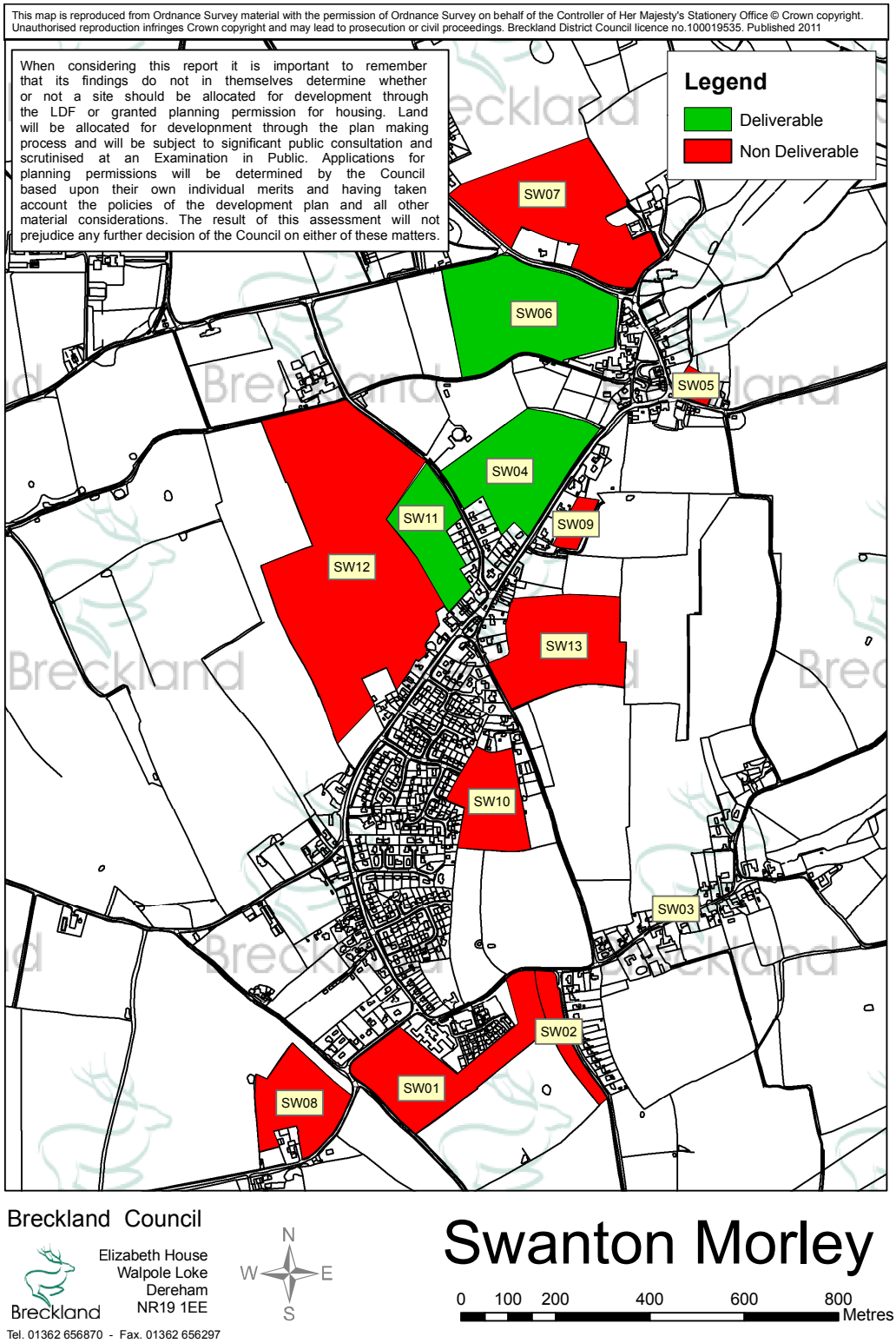
Map B.15 Saham Toney

Shipdham



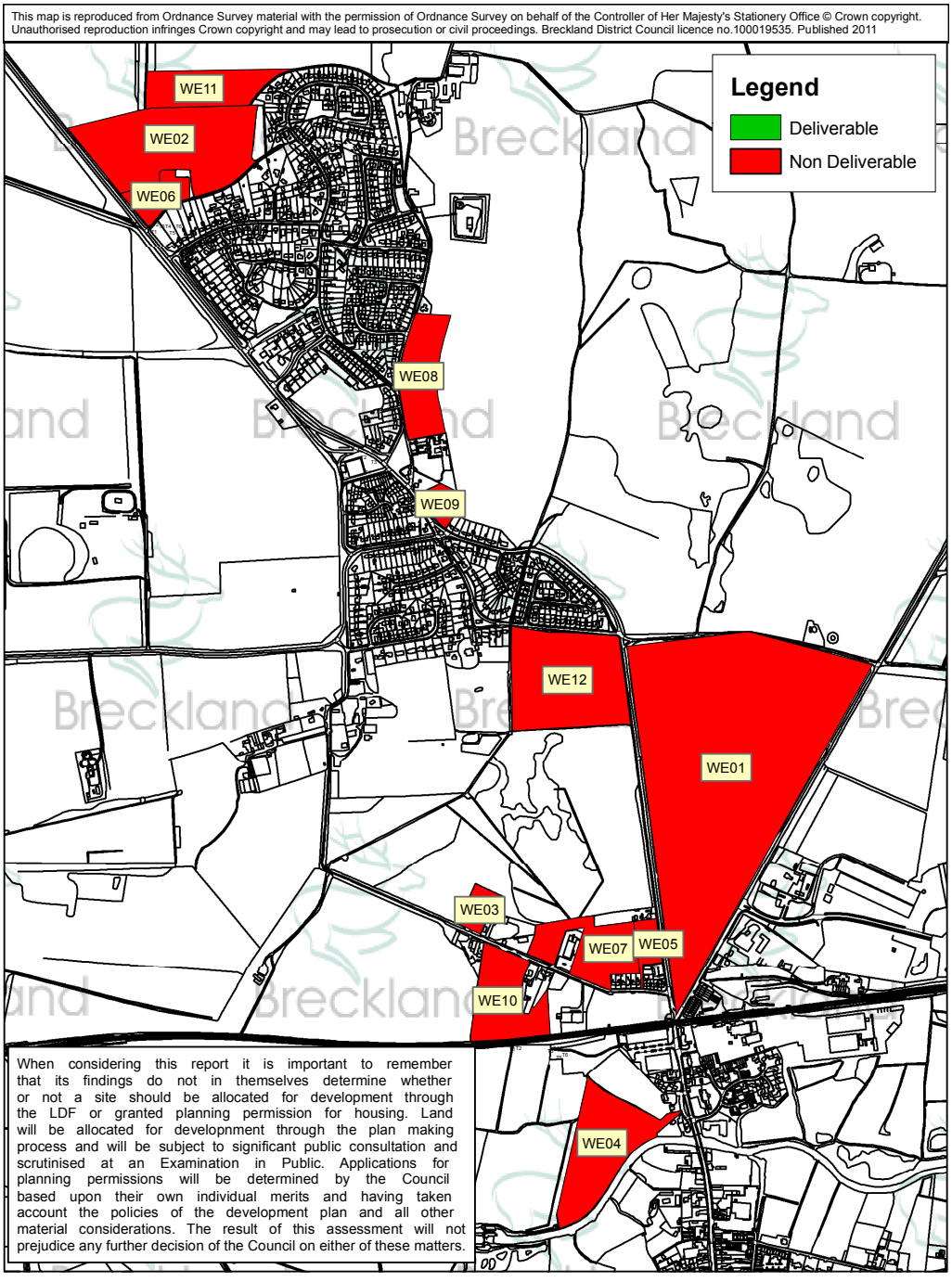
Map B.16 Shipdham

Swanton Morley



Map B.17 Swanton Morley

Weeting



Map B.18 Weeting

Appendix C Suitability/Achievability Matrix

This section is not included in this document due to size, but is available as a separate electronic file.

Appendix D Reduced Land Value Viability Model

This is an interactive spreadsheet and is therefore not included in this document.