

Strategic Housing Land Availability Assessment Review 2014

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 reviewed in 2011. This latest document updates the findings with any new qualifying sites that have been submitted to the Council since 2011 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 existing Core Strategy, Site Specific Policies and Proposals and Area Action Plans which remain as the adopted planning framework of Breckland Council. Therefore, the adopted policies still remain the starting point for determining Planning Applications.

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2 Introduction

2.1 The Strategic Housing Land Availability Assessment (SHLAA) is a key piece of the evidence base upon which the new Local Plan will be based.

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 second review of the SHLAA and the document responds to a number of further key changes to national planning policy as well as reflecting the changes in land values since the last 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 Local Plan 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 taking 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 The National Planning Policy Framework (NPPF), together with the National Planning Practice Guidance supersedes remaining national planning policy documents and guidance, such as Planning Policy Statement (PPS) and Planning Policy Guidance (PPG).

3.2 A key message from the NPPF is that planning should "boost significantly the supply of housing". District planning authorities are required to establish an up to date evidence base and ensure that Local Plans meet the "full, objectively assessed need" for market and affordable housing in the housing market area. Failure of adequately conduct this work (compliance with national planning requirements) is one of the main reasons for a significant number of Local Plans across the country not being accepted by Inspectors at Local Plan examinations. Paragraph 159 of the NPPF requires "local authorities to prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period".

3.3 NPPF seeks to achieve a step-change in housing delivery through a more responsive and flexible supply of housing land. It 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. It requires this 5 year supply of land to be maintained over the plan period with an additional 5% buffer to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery, a buffer of 20% should be allowed to provide a realistic prospect of achieving planned supply of housing land.

3.4 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.

3.5 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, although the growth target will be further reviewed in the emerging district wide Local Plan.

3.6 Detailed practice guidance on Strategic Housing Land Availability Assessments was published in July 2007. As there is no further guidance published for the SHLAA process under the National Planning Practice Guidance, it is considered the 2007 guidance is still relevant. This SHLAA fulfils the process and requirements of the practice guidance and incorporates Breckland Council's assessment of its five year assessment of housing land supply.

3.7 The Strategic Housing Land Availability Assessment will inform the preparation of the Local Plan and other related Development Plan Documents.

4 Purpose of the Strategic Housing Land Availability Assessment

4.1 The purpose of the assessment was set out in paragraph 159 of the NPPF, which requires local authorities to prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

4.2 No specific guidance is available on the newly published online Planning Policy Guidance, the SHLAA guidance published in 2007 is still considered relevant which 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.

4.3 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.

4.4 The study is not an one off assessment, and will be updated as an integral part of the Annual Monitoring Report process.

5 Key Outputs and Processes

5.1 The following sets 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 e.g. 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 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 means 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 separately in line with the requirement as set out in the NPPF. The latest iteration "Breckland Five Year Housing Land Supply 2013/14" was published in July 2014. Together with the results of the SHLAA this evidence will inform the Council's assessment of its five year supply of housing land .

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 permissions (10 dwellings and above) questionnaires were 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 2014 there were approximately 490 small-scale sites with planning permission. It is considered unfeasible to appraise the achievability of every small-scale site. Therefore, for small sites (under 10 dwellings) an average completion rate has been applied based on identified trends.

Breckland's Five Year Housing Requirement

6.5 The Core Strategy requires Breckland to deliver at least **19,100** dwellings over the plan period to 2026. This equates to **780** a year. Table 6.1 'Five Year Housing Requirement' shows the housing requirement in detail. Between 1st April 2001 and 31st March 2014, **7,240** dwellings have been completed in Breckland. This leaves a further **11,860** new homes to be delivered over the remainder of the plan period. Taking into account the existing shortfall, this equals to **1,189** dwellings per year. The five year housing requirement for the District is therefore **5,945** dwellings.

Year	Actual Completions	Required Completions	Shortfall/Surplus
2001/2002	542	760	-217
2002/2003	604	760	-155
2003/2004	884	760	124
2004/2005	841	760	80
2005/2006	592	760	-168
2006/2007	520	760	-240
2007/2008	621	760	-135
Adoption of the RSS (Previous shortfall has been removed and included within new required completions field)			
2008/2009	626	780	-173
2009/2010	533	780	-252
2010/2011	377	780	-404
2011/2012	347	780	-433
2012/2013	328	780	-452
2013/2014	425	780	-355
Total since 1st April 2008	2,636	4,680	-2,044
Requirement over remainder of plan			

2014/2015	-	1,189	-
2015/2016	-	1,189	-
2016/2017	-	1,189	-
2017/2018	-	1,189	-
2018/2019	-	1,189	-
FIVE YEAR HOUSING REQUIREMENT		5,945	

Table 6.1 Five Year Housing Requirement

Breckland Five Year Deliverable Housing Supply

6.6 As of 1st April 2014, **3,049** dwellings had the benefit of planning permission and could be developed within the next five years. In addition to this figure there are further 1,579 dwellings on sites which have been allocated within development plan documents which could be developed within the five year period.

6.7 As described above, identified sites with planning permission were split into two categories, large sites (10+ dwellings) and small sites (less than 10 dwellings). Table 6.2 'Expected delivery of housing on identified sites' shows the expected delivery of housing on identified sites.

	2014/15	2015/16	2016/17	2017/18	2018/19	Total
Large sites	454	756	623	397	329	2,559
Small sites	145	145	145	55	-	490
Windfall development	0	0	0	130	130	260
Dereham allocations	0	40	48	50	42	180
Watton allocations	0	79	79	14	0	171
Local Service Centre allocations	4	55	53	30	0	142
Thetford SUE	0	0	207	207	211	625
Attleborough UE	0	0	0	0	0	0
Total	603	1,075	1,155	883	712	4,428
Requirement	1,189	1,189	1,189	1,189	1,189	5,945
Shortfall/ Surplus	-586	-114	-34	-306	-477	-1,517

Table 6.2 Expected delivery of housing on identified sites

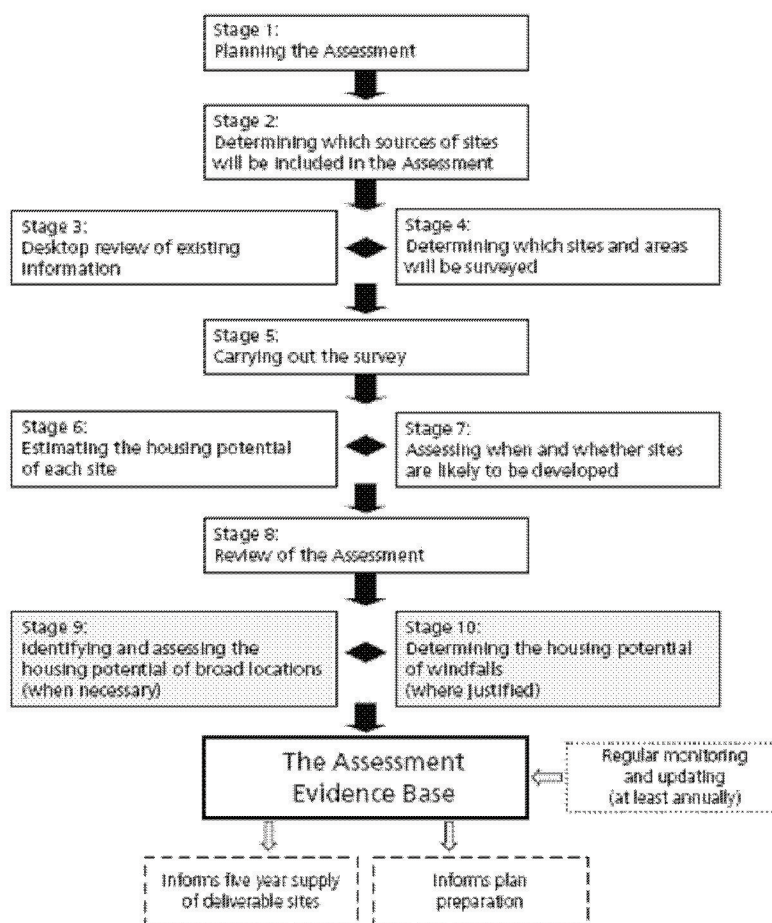
6.8 Based on the previous completion data the total annual average completions on small scale sites' lapse rate is extremely low, which is in the region of 3%. As of the 1st April 2014, there were **490** dwellings with the benefit of planning permission on small-scale sites. Assuming 3% of these sites will lapse, it is likely that 475 of these dwellings will be delivered over the plan period as shown in Table 6.2 'Expected delivery of housing on identified sites'

6.9 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 **3.72** year (3.29 years taking into account the 20% buffer) deliverable housing supply and is **1,517** dwellings short of the 5 year target based purely upon sites which are either under construction or those that have an implementable planning permission.

6.10 The assessment in this section identifies that as of 1st April 2014 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.

7 Methodology

7.1 The 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 are described below.

Stage 1: Planning the assessment

7.3 The methodology developed for Breckland's SHLAA has been through a number of stages. A first draft SHLAA methodology was developed in 2008 as part of the first version. The methodology was revised in its first review in 2011/12 and the revised SHLAA retained 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 Development Plan Documents. 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 held a stakeholder workshop to seek opinions on the key assumptions of the study. Stakeholders comprises key players from the house building, planning and social housing sectors alongside representatives from the Housing, Planning and Asset Management teams on behalf of the District Council.

7.7 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.

7.8 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

7.9 The scope of the study is built upon the previous methodology. However, it has been updated to reflect the changes of national planning policy and guidance over the subsequent reviews and updates.

7.10 In summary, this SHLAA revision includes sites identified from the SHLAA revision in 2011 and additional sites being put forward from the first round of call for sites as part of the Local Plan process. Inclusion of sites primarily centred around existing towns and service centre villages with sites over 0.1 hectares in size. This includes both urban extension sites and brownfield sites.

7.11 The detailed breakdown of the site categories being considered is included in Appendix A.

Stage 3: Desktop review of existing information

7.12 Having identified the potential sources of capacity as of stage 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.

7.13 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.

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

7.15 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 reliable than identified sites they will not form part of the identified land that is suitable for housing.

7.16 For the purposes of identifying the sites from the sources set out in the scope 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 certainty 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

7.17 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.

7.18 Particularly in relation to the identification mechanism for the sources set out in Appendix A, there is a 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.

7.19 In the absence of a new growth strategy and spatial distribution policy, the survey follows the existing Core Strategy to determine the scope.

7.20 The NPPF is 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 current Core Strategy has identified that there was 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

7.21 Based on the existing SHLAA methodology, only sites that are within or immediately adjacent to these settlements will be surveyed for the purposes of the sources set out in Appendix A.

Site size threshold

7.22 In order to prioritise the assessment of sites that are considered to be of strategic importance, only sites that are likely to yield 10 or more dwellings in the case of the market towns or 5 or more dwelling in the case of the other villages and the site size is above 0.1 hectares will be considered as part of the SHLAA.

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

Step 5: Carrying out the survey

7.24 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.

7.25 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

7.26 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.

7.27 The estimation of a site's housing capacity will be made by using density 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.

7.28 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.

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

Accessibility/ Location	Density Multiplier
1. Most accessible (Town Centre)	50
2. Edge of Centre (rest of town brownfield)	45
3. Edge of town (small/medium greenfield sites)	35
4. Out of town (large scale urban extensions)	30
5. Local Service Centre Villages (any sites)	25

Table 7.1 Density Multipliers

7.30 The review of the SHLAA provides an opportunity to reflect upon the values used in the context of the current development climate. The coalition government has introduced the NPPF to replace the Planning Policy Statement and the Planning Policy Guidances. 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 considered that higher densities could be achievable in certain locations. 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.

7.31 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 NPPF, 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 that are not in or on the edge of centre, but which are within the settlement boundary of a market town. Out of town sites are those that are outside of the settlement boundaries of a market town or are within or on the edge of a village.

7.32 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. A calculation of net dwelling density must be made to ensure a realistic figure of the dwellings that will yield from a particular site. However, the different size and location of a site means that it is difficult to apply a universal multiplier to predict the net developable area. Therefore, some discrepancy will be allowed at the site assessment stage to provide a realistic constrained capacity for individual sites on a case by case basis.

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

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

7.34 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.

7.35 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 new district wide Local Plan, which will be produced in accordance with the relevant regulations, which include significant phases of public consultation.

7.36 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. Alternatively it may be dependant upon the potential for public sector intervention to unblock constraints or the will of a service provider to install strategic infrastructure to support possible future growth.

7.37 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.

7.38 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 vice versa.

7.39 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

7.40 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. Alternatively 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.

7.41 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.

7.42 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.

7.43 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.

7.44 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.

7.45 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 possibly 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.

7.46 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.

7.47 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. Similar 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.

7.48 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.

7.49 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.

7.50 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

7.51 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.

7.52 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.

7.53 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. 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.

7.54 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.

7.55 The detailed decision making criteria for flood risk constraint 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.

7.56 Source Protection – 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 affect whether a site is developable.

7.57 The detailed decision making criteria for source protection constraint 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.

7.58 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 severely affected by a significant pollutant source would be unlikely to obtain planning permission and therefore it would affect whether a site could be considered developable. As there may be some possible mitigation against these affects proximity to pollutant sources is not considered to be a fundamental constraint.

7.59 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. Where

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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.

7.60 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 deliverability or developability of any site.

7.61 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 Settlement Fringe Study. If a site is within an area identified as having a high or high to moderate sensitivity 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

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

7.63 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.

7.64 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.

7.65 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 affect whether a site can be considered developable.

7.66 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 constraint is unlikely to significantly affect the developability of a site. Sites outside of a designated employment area will be considered unconstrained.

Accessibility

7.67 The accessibility of key services and facilities is an important consideration in regard 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.

7.68 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.

7.69 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 an 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 be considered to be severely constrained. 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.

7.70 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.

7.71 The detailed decision making criteria for this constraint has been derived from 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

7.72 If a site is within 800m of at least two of these facilities and the other facility is within the same settlement then this will be considered a positive indication of the sites suitability. If only one facility is within 800m, but the other two 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 two of these facilities are available within the same settlement then the site will be considered severely constrained.

7.73 Access to Open Space – Paragraph 73 of the NPPF, states that open spaces, sport and recreation can make an important contribution to the health and well-being of communities. 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.

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

7.75 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.

7.76 Access to Employment – NPPF explains the Government's 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.

7.77 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.

7.78 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.

7.79 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.

7.80 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 Local Plan evidence base.

Quantification of constraints to development

7.81 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.

7.82 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 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 Local Plan. This more detailed assessment will include and take into account representations made in response to consultation on the Development Plan Document (DPD).

7.83 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 Local Plan or other DPDs.

7.84 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
	Groundwater Source Protection
	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 7.2 Suitability and Achievability Matrix - List and Categorisation of Constraints

Suitability and Achievability Assessment Matrix				
	Category A Constraint; does the identified constraint rule out development on the site?	Category B Constraint: How severe is the constraint?		
	Yes / No	Level 3: Constraint is very severe and its effect brings into question the achievability or suitability of the site.	Level 2: Constraint is relevant to the site but it does not materially effect the achievability or suitability	Level 1: 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				
Source Protection				
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 7.3 Suitability and Achievability Matrix

Identify actions to overcome constraints

7.85 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 which form those identified actions might take.

7.86 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

7.87 Viability is key to assessing the likelihood of a site being deliverable. 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 comply to policy requirements as well as obtaining a satisfactory return from the developer.

7.88 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.

7.89 The review of the SHLAA presents an opportunity for the Council to utilise the Homes and Communities Agency (HCA) Area Viability Model v2.2, which enables a group of sites to be assessed together as part of a particular typology. The advantage of using such an approach is 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.

7.90 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.


7.91 The Council has undertaken a number of viability studies to inform the plan making process, including that used to inform the preparation of the Community Infrastructure Levy (CIL) and to assess the impacts CIL will have on development viability. Going forward the cumulative impacts of emerging policies and requirements in the Breckland's emerging Local Plan will also be subject to viability testing through the Local Plan Viability Assessment. The primary aim is to ensure that the development set out in the plan will be deliverable and that the Plan will be effective.

7.92 Viability testing is an iterative process. This is an essential part of the plan making process, taking into account market changes and the ongoing amendments to various guidance and examiners decisions.

7.93 The viability work in the SHLAA will continue to be updated as the Council moves towards a new Local Plan. A number of assumptions which have been marketed-tested through CIL process are carried through, whilst some market values and assumptions are updated where appropriate. The sales values attributed to the typologies and locations have been checked using the Council's "Hometrack" system which provides independent actual-market data from across the district. This provides a level of robustness to these updated values.

7.94 It is impractical and not necessary to consider the viability of every site as the NPPF is founded on the principle of using "appropriate available evidence" and evidence that is proportionate to scale. Viability testing at this level therefore adopts a "broad brush" approach. We are not trying to mirror any particular developer's business model, rather we are making broad assessments of viability in the context of the plan making requirements of the NPPF and NPPG.

7.95 The basic viability methodology involves preparing a financial development appraisal across the range of typologies to assess whether sites within the SHLAA are likely to be deliverable or not.



7.96 The study groups the SHLAA sites into the various typologies using the HCA's Area Wide Viability Model, V2.2, March 2012. This model is a strategic tool designed to assist in analysing the differences between selected development typologies in different localities and sub markets.

7.97 The base line costs assumptions are based on the Building Cost Information Service (BCIS) data utilising the figures for Norfolk. The median figure has been used for different development types that occur in the appraisals.

7.98 In addition an allowance is made for a range of infrastructure costs (roads, drainage and services within the site), landscaping, and footpaths. A charge equivalent to 15% of the gross construction cost has been included for external works. This is in line with the advice contained in the Harman Guidance appendix B and is also equivalent to the rate used within the viability assessment for the Community Infrastructure Levy.

7.99 The model uses the residual value methodology that is set out in the Harman Guidance and is in accord with the RICS guidance. The residual value is the top limit of what a developer could offer for a site and still make a satisfactory profit margin. The residual value is compared to the alternative use value for each site. Only if the residual value exceeds the alternative figure, and by a satisfactory margin, can a site be judged to be viable.

7.100 The model allows existing use values to be used plus a premium which becomes the threshold land value. The values used within the Community Infrastructure Levy viability assessment were £432,000 per hectare within Attleborough, Dereham and the rural areas to the east of the District and £371,000 per hectare. When considering the existing use value for greenfield land, this equates to £18,500 per hectare. Therefore a premium is required in order facilitate the sales of the land.

7.101 A full list of assumptions can be seen at Appendix B 'Normal Costs Associated with the Residential Development of a site.'

7.102 It is stressed that this is a high level and broad brush study that is seeking to capture the generality rather than the specific. The approach used by the model, is to collate all the sites in a typology together, although not all of these sites will come forward. The purpose is to establish whether the combined sites in each typology are generally viable. This information will help the Council to assess whether or not the sites can actually deliver.

Delivery of sites

7.103 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.

7.104 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.

7.105 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

7.106 Once the initial survey work has been carried out and an assessment made 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.

7.107 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)

7.108 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.

7.109 Examples of broad locations suggested by the Practice 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.

7.110 Where broad locations have been identified, estimates of potential housing supply will be developed having had regard to the nature and scale of the opportunities within the broad locations and market conditions.

Stage 10: Determining the housing potential of windfall

7.111 Windfall sites are previously developed sites that come forward for development, but have not been specifically identified as available in the plan process. However, the NPPF indicates that 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.

7.112 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.

7.113 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 previous and the current development plan process. 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 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	2014-2019	2019-2024	Post 2024
Attleborough Brownfield	246	203	10	33
Attleborough Greenfield Urban Extension	11,775	314	910	10,551
Local Service Centre Village	2,036	1,680	356	0
Market Town Brownfield	473	34	280	159
Market Town Extension	4,322	1,944	1,428	950
Thetford Brownfield	22	10	12	0
Thetford Greenfield Urban Extension	5,000	1,520	1,900	1,580
Total by phase	23,874	5,705	4,896	13,273

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	2014-2019	2019-2024	Post 2024	Total Of Constrained Capacity
Attleborough	517	920	10,584	12,021
Banham	8	0	0	8
Dereham	589	631	547	1,767

Settlement	2014-2019	2019-2024	Post 2024	Total Of Constrained Capacity
Great Ellingham	73	108	0	181
Harling	595	48	0	643
Litcham	46	0	0	46
Mattishall	31	0	0	31
Narborough	112	200	0	312
Necton	180	0	0	180
North Elmham	30	0	0	30
Old Buckenham	10	0	0	10
Saham Toney	90	0	0	90
Shipdham	193	0	0	193
Swaffham	435	874	362	1,671
Swanton Morley	277	0	0	277
Thetford	1,530	1,912	1,580	5,022
Watton	954	203	200	1,357
Weeting	35	0	0	35
Total by 5 year period	5,705	4,896	13,273	23,874

Table 8.2 Constrained capacity by Settlement

Identification of Sites

8.5 Using the method set out in Section 7, 290 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 8.3 'Number of suitable and achievable sites by location'. Maps illustrating the identified sites are included at Appendix C.

Suitability and achievability

8.6 Once identified, the sites were assessed against the suitability and achievability matrix as set out within the methodology using a GIS based approach. 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 D.

8.7 Development was considered to be suitable and achievable on 119 of the 290 sites that were identified. The distribution of those sites is set out in table below:

Settlement	Total No. of sites	No. of suitable and achievable sites	No. Non-Deliverable
Attleborough	29	22	7
Dereham	24	12	12
Swaffham	20	9	11
Thetford	4	3	1
Watton	26	16	10
Banham	5	2	3
Great Ellingham	19	9	10
Harling	13	8	5
Litcham	7	4	3
Mattishall	18	2	16
Narborough	10	4	6
Necton	13	5	8
North Elmham	11	3	8
Old Buckenham	12	2	10
Saham Toney	21	6	15
Shipdham	33	7	26
Swanton Morley	13	4	9
Weeting	10	1	9
Total	290	119	171

Table 8.3 Number of suitable and achievable sites by location

8.8 Of the 119 sites that have been identified as suitable and achievable (i.e. could be built out in the years 2014-2029), these could yield a capacity of some 23,874 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 HCA area wide viability model. The results of which can be seen in Appendix E.

8.10 The HCA Area Viability model assesses 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 HCA area wide viability model displays each of the results by the typology as defined within the methodology. The residual land value relates to the amount of money left over to purchase the land after all other costs and the developers profit have been removed from the gross development value. The results display the residual land value for each of the typology, and also a per-hectare rate.

8.13 The threshold land value relates to the value required at a price that a landowner is willing to sell. The threshold land value varies across the District in a similar manner to the residential sales values. The viability model allows the option to either use a comparable value or an existing use value plus a premium. The comparable value has regard to the values which were tested through the Community Infrastructure Levy viability assessment. This equated to £432,000 per hectare in Attleborough and the rural areas to the north and east of the District and £371,000 per hectare for Thetford and the south and west of the district. These values were consulted on through the CIL preliminary draft charging schedule consultation. Additionally the viability model also allows testings the existing use values plus a premium to reflect the need to incentivise the landowner to sell.

8.14 The viability results for the urban extensions in both Attleborough and Thetford are impacted upon by their high infrastructure requirements. This includes the need to provide new primary schools and in Attleborough’s case, a new link road between the B1077 and London Road. Under the Attleborough Greenfield Extension typology, the model indicates that the residual land value is potentially lower than the threshold land value. This is principally due to these high s106 costs, particularly associated with the delivery of the link road.

8.15 From the results it is possible to observe that the Thetford Greenfield Urban Extension is not viable taking into account all of the costs associated with bringing the land forward. This is due to the fact that the residual land value is below a level which would be required to purchase the land. The decision to grant planning approval for the Thetford Urban Extension was taken in April of this year. However, it is worth noting that due to the viability of the scheme the level of affordable housing on the site was significantly reduced as part of the planning application. The affordable housing level was reduced to 15% for the first phase of development and 10% thereafter. This viability report has tested the Thetford Greenfield Urban Extension with 40% affordable housing and therefore this has impacted upon the viability. An additional impact upon viability in the area is also the overall housing sales values. Thetford has the lowest housing sales values in Breckland. Within the town, the regeneration, associated with the urban extension, has the potential to raise land values which will in turn aid the viability of developments.

8.16 Similar to the Thetford Greenfield Urban Extension typology, the Watton Greenfield typology shows a negative residual land value. Watton has the second lowest residential sales values of all the towns within Breckland which significantly impacts upon the viability of this typology. An important impact upon viability relates to the model testing 40% affordable housing. Planning applications within Watton are currently seeking a lower level of on-site affordable housing provision.

8.17 In addition to the above, other funding streams may be required to ensure that sites continue to be brought forward in a timely manner. This may include funding streams such as the new homes bonus, which could be used to unlock infrastructure requirements associated with developments.

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 2014-2019.

8.20 Tables 8.4 to 8.21 set out the projected site completions in time bands by settlement. These tables are set out below:

Sum of Constrained Capacity	Delivery Timescale			Grand Total
	SHLAA ref	2014 to 2019	2019 to 2024	
A01	0	0	5,000	5,000
A02	0	0	2,374	2,374
A03	0	0	1,829	1,829
A04	0	0	1,100	1,100
A06	0	250	23	273
A07	0	250	125	375
A09	0	250	38	288
A11	38	0	0	38
A12	95	0	0	95
A13	67	0	0	67
A14	73	0	0	73
A15	55	0	0	55
A16	0	0	33	33
A17	22	0	0	22
A18	0	0	62	62

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2014 to 2019	2019 to 2024	Post 2024	Grand Total
A19	24	0	0	24
A20	17	0	0	17
A21	19	0	0	19
A22	21	0	0	21
A23	0	10	0	10
A24	86	0	0	86
A26	0	160	0	160
Grand Total	517	920	10,584	12,021

Table 8.4 Projected Site Completion Dates by Time Band in Attleborough

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2014 to 2019	2019 to 2024	Post 2024	Grand Total
D02	0	0	124	124
D03	116	0	0	116
D04	20	0	0	20
D09	0	250	310	560
D12	0	131	0	131
D13	16	0	0	16
D17	220	0	0	220
D18	14	0	0	14
D24	200	0	0	200
D25	0	250	35	285
D27	3	0	0	3
D28	0	0	78	78

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2014 to 2019	2019 to 2024	Post 2024	Grand Total
Grand Total	589	631	547	1,767

Table 8.5 Projected Site Completion Dates by Time Band in Dereham

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2014 to 2019	2019 to 2024	Post 2024	Grand Total
S01	140	0	0	140
S02	200	282	0	482
S14	0	30	0	30
S15	0	180	0	180
S17	0	0	144	144
S19	0	0	218	218
S22	0	75	0	75
S24	95	249	0	344
S26	0	58	0	58
Grand Total	435	874	362	1,671

Table 8.6 Projected Site Completion Dates by Time Band in Swaffham

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2014 to 2019	2019 to 2024	Post 2024	Grand Total
T01	1,520	1,900	1,580	5,000
T03	0	12	0	12
T04	10	0	0	10
Grand Total	1,530	1,912	1,580	5,022

Table 8.7 Projected Site Completion Dates by Time Band in Thetford

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2014 to 2019	2019 to 2024	Post 2024	Grand Total
W01	0	13	0	13
W02	40	0	0	40
W04	18	0	0	18
W06	95	0	0	95
W07	30	0	0	30
W09	0	190	0	190
W13	108	0	0	108
W14	0	0	200	200
W15	164	0	0	164
W19	80	0	0	80
W20	65	0	0	65
W22	100	0	0	100
W23	20	0	0	20
W24	129	0	0	129
W27	33	0	0	33
W29	72	0	0	72
Grand Total	954	203	200	1,357

Table 8.8 Projected Site Completion Dates by Time Band in Watton

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2014 to 2019	2019 to 2024	Post 2024	Grand Total
BA04	4	0	0	4
BA05	4	0	0	4
Grand Total	8	0	0	8

Table 8.9 Projected Site Completion Dates by Time Band in Banham

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2014 to 2019	2019 to 2024	Post 2024	Grand Total
EH02	202	0	0	202
EH03	250	48	0	298
EH04	80	0	0	80
EH06	13	0	0	13
EH07	27	0	0	27
EH10	6	0	0	6
EH12	12	0	0	12
EH13	5	0	0	5
Grand Total	595	48	0	643

Table 8.10 Projected Site Completion Dates by Time Band in East Harling

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2014 to 2019	2019 to 2024	Post 2024	Grand Total
GE03	5	0	0	5
GE07	35	0	0	35
GE09	5	0	0	5
GE10	0	95	0	95
GE13	10	0	0	10
GE16	0	8	0	8
GE18	0	5	0	5
GE20	5	0	0	5
GE21	13	0	0	13
Grand Total	73	108	0	181

Table 8.11 Projected Site Completion Dates by Time Band in Great Ellingham

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2014 to 2019	2019 to 2024	Post 2024	Grand Total
LI03	9	0	0	9
LI04	24	0	0	24
LI05	6	0	0	6
LI07	7	0	0	7
Grand Total	46	0	0	46

Table 8.12 Projected Site Completion Dates by Time Band in Litcham

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2014 to 2019	2019 to 2024	Post 2024	Grand Total
MA04	11	0	0	11
MA18	20	0	0	20
Grand Total	33	0	0	33

Table 8.13 Projected Site Completion Dates by Time Band in Mattishall

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2014 to 2019	2019 to 2024	Post 2024	Grand Total
NA1	0	200	0	200
NA2	78	0	0	78
NA4	24	0	0	24
NA7	10	0	0	10
Grand Total	112	200	0	312

Table 8.14 Projected Site Completion Dates by Time Band in Narborough

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2014 to 2019	2019 to 2024	Post 2024	Grand Total
NC06	6	0	0	6
NC07	47	0	0	47
NC08	98	0	0	98
NC10	19	0	0	19
NC13	10	0	0	10
Grand Total	180	0	0	180

Table 8.15 Projected Site Completion Dates by Time Band in Necton

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2014 to 2019	2019 to 2024	Post 2024	Grand Total
NE02	5	0	0	5
NE03	7	0	0	7
NE05	18	0	0	18
Grand Total	30	0	0	30

Table 8.16 Projected Site Completion Dates by Time Band in North Elmham

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2014 to 2019	2019 to 2024	Post 2024	Grand Total
OB01	5	0	0	5
OB03	5	0	0	5
Grand Total	10	0	0	10

Table 8.17 Projected Site Completion Dates by Time Band in Old Buckenham

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2014 to 2019	2019 to 2024	Post 2024	Grand Total
SH01	38	0	0	38
SH03	12	0	0	12
SH12	16	0	0	16
SH13	22	0	0	22
SH14	3	0	0	3
SH16	65	0	0	65
SH32	12	0	0	12
Grand Total	168	0	0	168

Table 8.18 Projected Site Completion Dates by Time Band in Shipdham

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2014 to 2019	2019 to 2024	Post 2024	Grand Total
ST01	29	0	0	29
ST05	10	0	0	10
ST06	10	0	0	10
ST09	10	0	0	10
ST10	21	0	0	21
ST14	10	0	0	10
Grand Total	90	0	0	90

Table 8.19 Projected Site Completion Dates by Time Band in Saham Toney

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2014 to 2019	2019 to 2024	Post 2024	Grand Total
SW03	6	0	0	6
SW04	96	0	0	96

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2014 to 2019	2019 to 2024	Post 2024	Grand Total
SW06	133	0	0	133
SW11	42	0	0	42
Grand Total	277	0	0	277

Table 8.20 Projected Site Completion Dates by Time Band in Swanton Morley

Sum of Constrained Capacity	Delivery Timescale			
SHLAA ref	2014 to 2019	2019 to 2024	Post 2024	Grand Total
WE02	35	0	0	35
Grand Total	35	0	0	35

Table 8.21 Projected Site Completion Dates by Time Band in Weeting

Cumulative effect constraints and time limited constraints

8.21 The assessment so far has taken into account the constraints at site level. However, the cumulative effects of development in a particular market town need to be considered in addition to individual site level constraints to establish a more credible evidence of delivery. There are identified upward limits for development in some market towns above which the achievability of development could be questionable. These need to be factored into the delivery trajectories. Also, 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.

8.22 In addition, a number of settlements and site specific constraints that may have a time limiting effect of developing a site. These factors have 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.

8.23 The research into existing evidence has suggested additional assessment into the following market towns regarding cumulative effect and time limited constraints:

8.24 **Thetford** is surrounded by a number of protected European Habitats (SPA and SAC), and evidence reveals that development may adversely affect these sites. As a 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 means that the developable area is restricted. Therefore, 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. Outline planning permission now has been granted for this site.

8.25 The assessment indicates that a total of 5,022 dwellings can be delivered over the plan period in Thetford. This indicates a small number of dwellings will be developed on brownfield in Thetford on top of the 5,000 limit. Given the scale of additional housing beyond the threshold is minimal, the 22 dwellings are not considered to be a major obstacle over achievability.

8.26 Dereham: The previous SHLAA has identified that Dereham had significant constraints for schools and the Education Authority indicated that both of the town's existing high schools were landlocked and had limited room to expand. However, the comments received from Norfolk County Council as part of this SHLAA stakeholder consultation in June 2014 has suggested that both schools could potentially be expanded on their current sites.

8.27 The earlier evidence underpinning the previous SHLAA and the Core Strategy indicated a limited capacity of waste water treatment in Dereham and there was only sufficient capacity to accommodate 600 dwellings which accords with the Core Strategy and the Water Cycle Study evidence. Since then, there had been further development of sewage capacity with a new pumping station constructed near Dereham which has helped unlock the constraints to some extent. However, without a further Water Cycle Study it is difficult to quantify the current capacity of waste water treatment hence the constrained development capacity in Dereham.

8.28 Given the above considerations, it is decided that the upper development limit is removed for the purpose of this study. However, the relevant constraints will be closely monitored as new pieces of evidence become available during the Local Plan process.

8.29 Attleborough: The existing gyratory system in the centre of Attleborough is showing signs of significant stress. The previous SHLAA revision in 2011 indicated 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 were considered to have both time and cost implications.

8.30 Since the SHLAA revision was published in 2011, there has been some improvement work carried out on the gyratory system. However, it is not considered that the time-limit constraints are fully unlocked. The assessment has indicated a delivery quantum of 517 dwellings over the first 5 year period, it is considered to be largely in line with the time-limited capacity of the market town (with some uplift on capacity) therefore no short-term up-limit was imposed on the delivery timescale. However, the time-limit capacity will be kept under review and future iterations of the document and additional evidence base will help to refine the assessment of time-limiting constraints.

8.31 In summary, the investigation into cumulative constraints and time limited constraints has suggested a limited impact of the existing capacities as indicated through the individual site assessments. Therefore, no adjustments were made to the delivery timescale as indicated in Table 8.2 'Constrained capacity by Settlement'. However, given the uncertainty of the factors addressed above, these assumptions will be kept under review and subject to further evidence as part of the Local Plan process.

Housing Projections

8.32 Housing projections have been constructed across the three time periods, in line with the national guidance, i.e. 1-5 years, 6-10 years and 10 years and beyond. In the construction of these projections consideration has been given to the assessment into site constraints and the likely build out rates.

8.33 The build out rates were created on the basis of a single developer building out the site. 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.

8.34 The projection used average annual delivery rate for year 1-5, which means if a site is being identified deliverable within the first five years, then development quantum is spread evenly across the five years to average out unexpected variations. It is considered that predicting exact commencement and completions time for deliverable sites within the first 5 year period adds very little value. For sites identified developable or deliverable beyond the first five years, it is assumed that constraints can be unlocked therefore a full built out rate is applied as described above.

Market Towns

Market Town Delivery Timescale

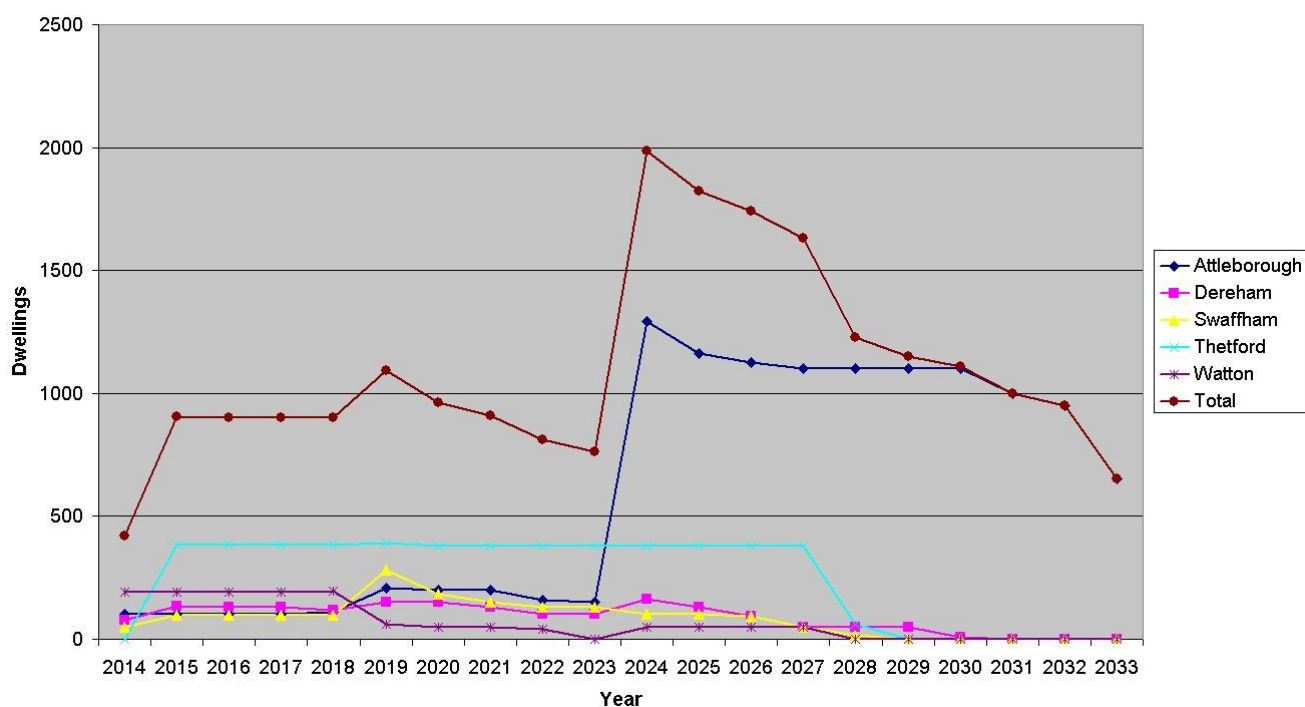


Figure 8.1 Market Town Delivery Timescale

8.35 The projection above demonstrates that there are large variations in the annual projected completions over the period 2014 to 2033. This higher rate of projected housing completions is comprised throughout the period until 2033 and the delivery trend is especially strong towards the middle and late phase of development. The high annual completions is largely due to the phased delivery of the 5,000 dwellings urban extension in Thetford which has gained outline approval. The projected peak build rate during the third phase of delivery is due to the urban extension of Attleborough comes on stream.

8.36 Housing delivery within Attleborough is relatively stable over the first 10 year period, with an average of just under 140 units being projected to complete per annum. There is a step change in housing delivery in 2024 which could see projected completions over 1,000 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 been the main reason for the fluctuations in the projected housing delivery rate. It is assumed that from around 2024 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.

8.37 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 suggest that the timescale set out in the housing projections is not unrealistic.

8.38 The projected delivery for Dereham is relatively stable across the time period, until 2033 when projected housing completions end. The projected housing delivery for Swaffham shows signs of similarity with that of Dereham. 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.

8.39 Following the recent resolution to grant outline permission to the Thetford Urban Extension site, the housing delivery for Thetford will be steadily coming on stream. Site T01 will see up to 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, as part of the evidence to inform the Core Strategy and Development Control Policies DPD.

8.40 In addition, 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.

8.41 Watton has a relatively good capacity for housing within the first five years, with an average capacity of 190 new homes per annum over this period. This decreases rapidly from year 6 until capacity is exhausted towards the end of the period. There is only limited quantum 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

Local Service Centre Delivery Timescale

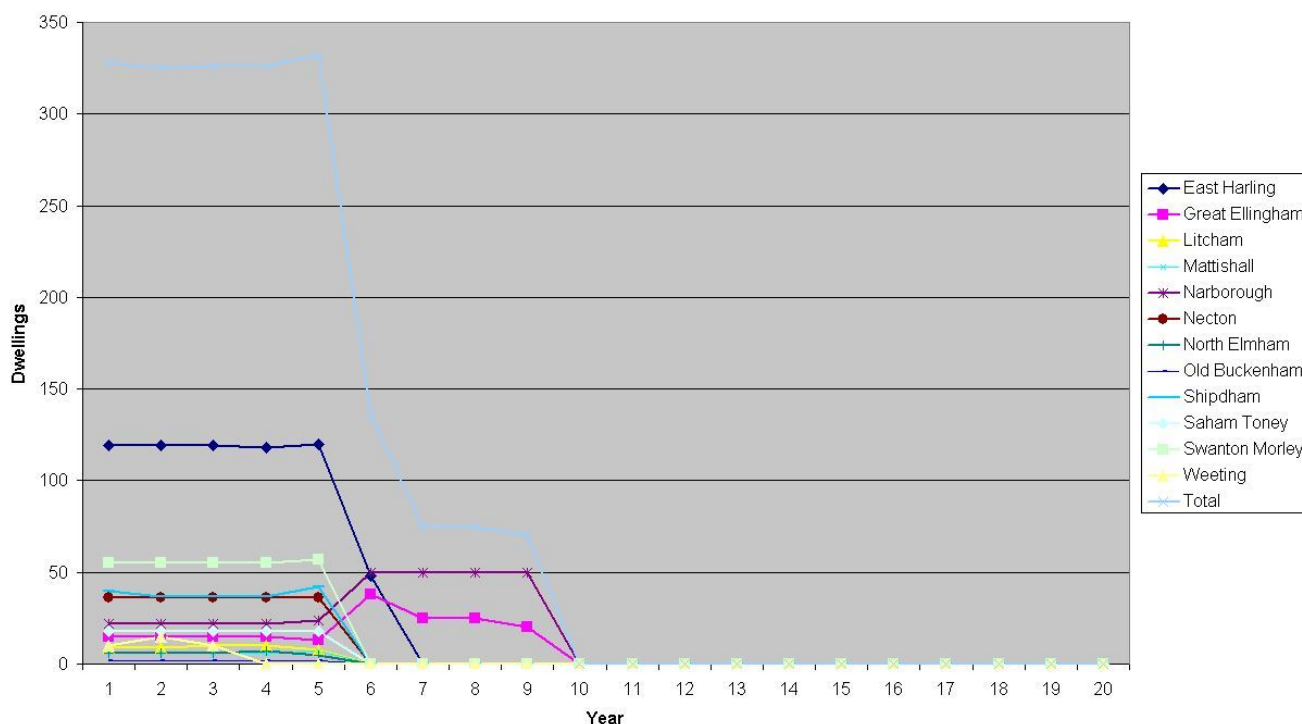


Figure 8.2 Local Service Centre Villages Delivery Timescale

8.42 Land supply per annum has also been analysed for the District's Local Service Centre Villages. This is shown within the projection above. 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.

8.43 The projections for Local Service Centre Villages show 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 five years, after this period there is no further projected housing completions over the trajectory. For the purpose of 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 for small or medium sites and 50 dwellings for larger sites. This development rate has led 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.

8.44 East Harling displays the potential for a more stable rate of housing delivery over a five year period. It is due to that there are a larger number of deliverable sites available, and furthermore these sites have larger capacities. For a few of these sites, this meant that their delivery had to be phased for longer than five years.

8.45 Great Ellingham and Narborough display different trends to the other Local Service Centre Villages. Although the first phase of sites are projected to be stable, the second phase, which is projected to commence from year 6 will see a considerable increase. The second phase is formed from site GE10 and NA1, with the lead in time for both of which relating to the requirement to provide improved highways infrastructure.

Housing Projections

8.46 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 2014-2019.

8.47 The overall results of the assessment indicate that a significant number of sites identified as being suitable, achievable and viable could be delivered between 2014 and 2019. 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.

8.48 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 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

8.49 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 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 a potential to improve viability through the reduction of the level of investment needed directly from development.

8.50 Although external 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.

8.51 Therefore, as discussed above it is possible that alternative funding will be required to ensure deliverability in some typologies such as large scale urban extensions to generate a sufficient residual land value in order for these sites to come forward.

Conclusions

8.52 Notwithstanding the identified site level and aggregate constraints, significant land with the potential for housing has been identified in the Towns and Local Service Centre villages.

8.53 In total 119 sites were identified where development was considered suitable and achievable. These 119 sites had the capacity to yield 23,874 houses of which, it has been estimated, 10,601 could realistically be built over the period 2014-2024. The large scale developments will have the majority of completions in later phase of the local plan period or possibly beyond.

8.54 Of those 23,874 houses it is estimated that 5,705 could be built in the period 2014-2019, 4,896 built in the period 2019-2024 and the remaining 13,273 developed post 2024. Average potential annual building rates were generally in the lower hundreds with a peak of over 1,500 units from 2024 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 towards the later part of the plan period and gradually declined until 2033 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.

8.55 In the short-term, it is anticipated that the delivery rate will pick up due to the government intervention in 2013 gradually taking effect. In the medium term, the sites that have been identified with the potential for housing in Watton are exhausted and sites in Swaffham are held up by necessary upgrades to the water supply network. 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 Paragraph 031 of the online Planning Practice Guidance (Reference ID 3-031-20140306) states that sites with planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year time frame. The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Local Authorities will need to "consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply."

9.2 One can reasonably assume that the Brownfield sites can be developed without much dependence on infrastructure thus can come forward within the 5 year period. In the meantime, although some relatively small scale Greenfield sites are identified deliverable in the SHLAA process, there are slightly more risks associated with them as some of them might depend on major constraints being unlocked.

9.3 Therefore, in light of the findings of the SHLAA it is considered that a number of Brownfield sites identified as being suitable, achievable and viable in the first 5 year period could be added to the Council's existing 5 year land supply figures to produce a composite land supply. 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
D04	Land North of Dumpling Green	2014 to 2019	20
D18	Land south of Nurseries, Shipdham Road	2014 to 2019	14
		Total	34

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

Composite Five Year Housing Land Supply

	2014/15	2015/16	2016/17	2017/18	2018/19	Total
Current 5-year HLA as at 1 April 2014	603	1,075	1,155	883	712	4,428
SHLAA sites	7	7	6	6	6	34
Total	610	1,082	1161	889	718	4,462
Requirement	1,189	1,189	1,189	1,189	1,189	5,945
Shortfall/ Surplus	-579	-107	-28	-300	-471	-1,384

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 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 Source of sites being considered

A.1 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. 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. However, due to practical concerns, only sites identified in or around certain settlements and over certain threshold are included. Nevertheless, considerations have been given as many types of sources as possible as a starting point to identify brownfield development opportunities, whilst the scope expands to include settlement extensions subsequently.

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	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 2 of the NPPF.
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

Source:	Comment:
	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 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.

Table A.1 Sources of Supply within the existing Urban Areas.

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 2 of NPPF, 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 A.2 Additional sources of supply considered by the SHLAA

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

B.1 Normal costs

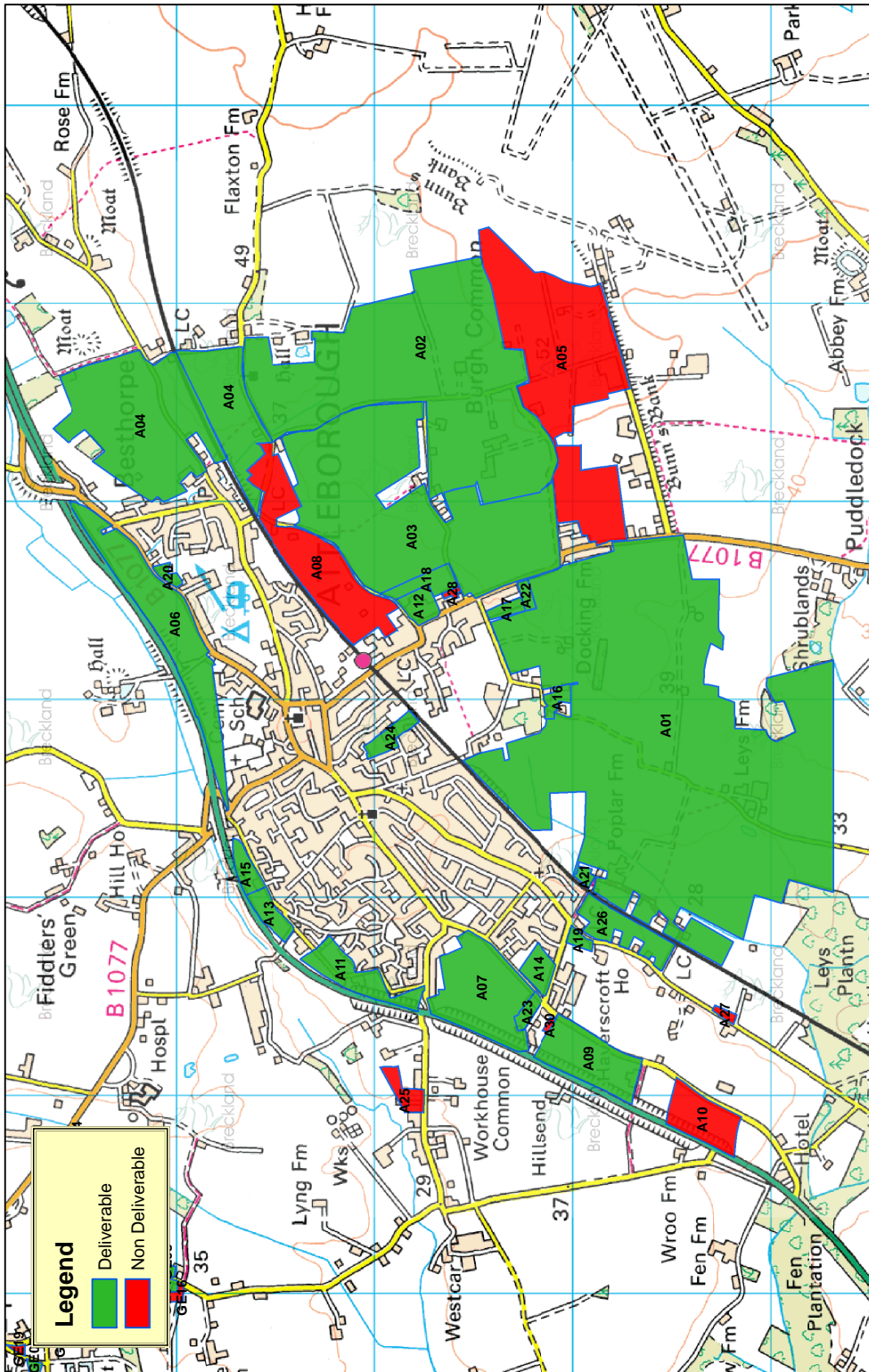
- Professional Fees - 10% of construction costs
- Marketing Costs - 5% of private sales values
- Associated Site Acquisition Costs - 2% of Land value
- Building Costs - £904 - £1,026 per m²
- External Works Costs - 15% of construction costs
- Reasonable Servicing Costs (per m² basis) to include:
 - Roads (on-site)
 - Sewers (on-site)
 - Civil Engineering
 - Minor Highway Improvements (off-site)
 - Surface Water Drainage
- Overheads
- Development Finance - 6.5%
- Return for Developer - Assumed as 20% on private dwellings and 6% of affordable dwellings,

B.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. The existing planning policy require an affordable housing level of 40%

B.3 S106 Costs. This has been calculated having full regard to all s106 agreements which have been signed since the Core Strategy and Development Control Policies DPD was adopted in 2009. Since this document was adopted the average s106 cost per dwelling has been £2,600. These costs include provision for the following infrastructure items:

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

Appendix C Site Maps



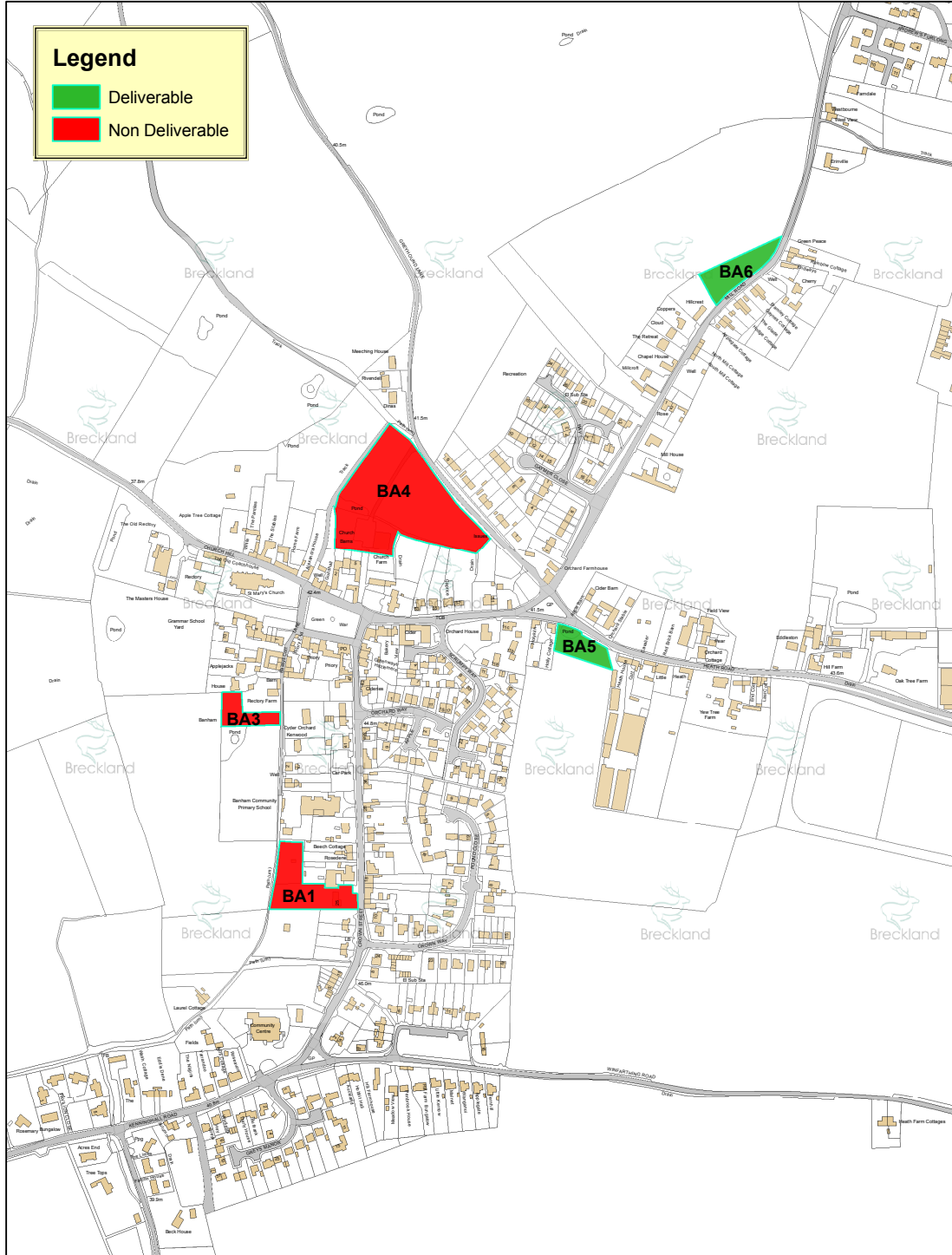
Attleborough

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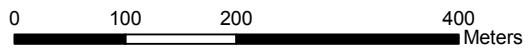




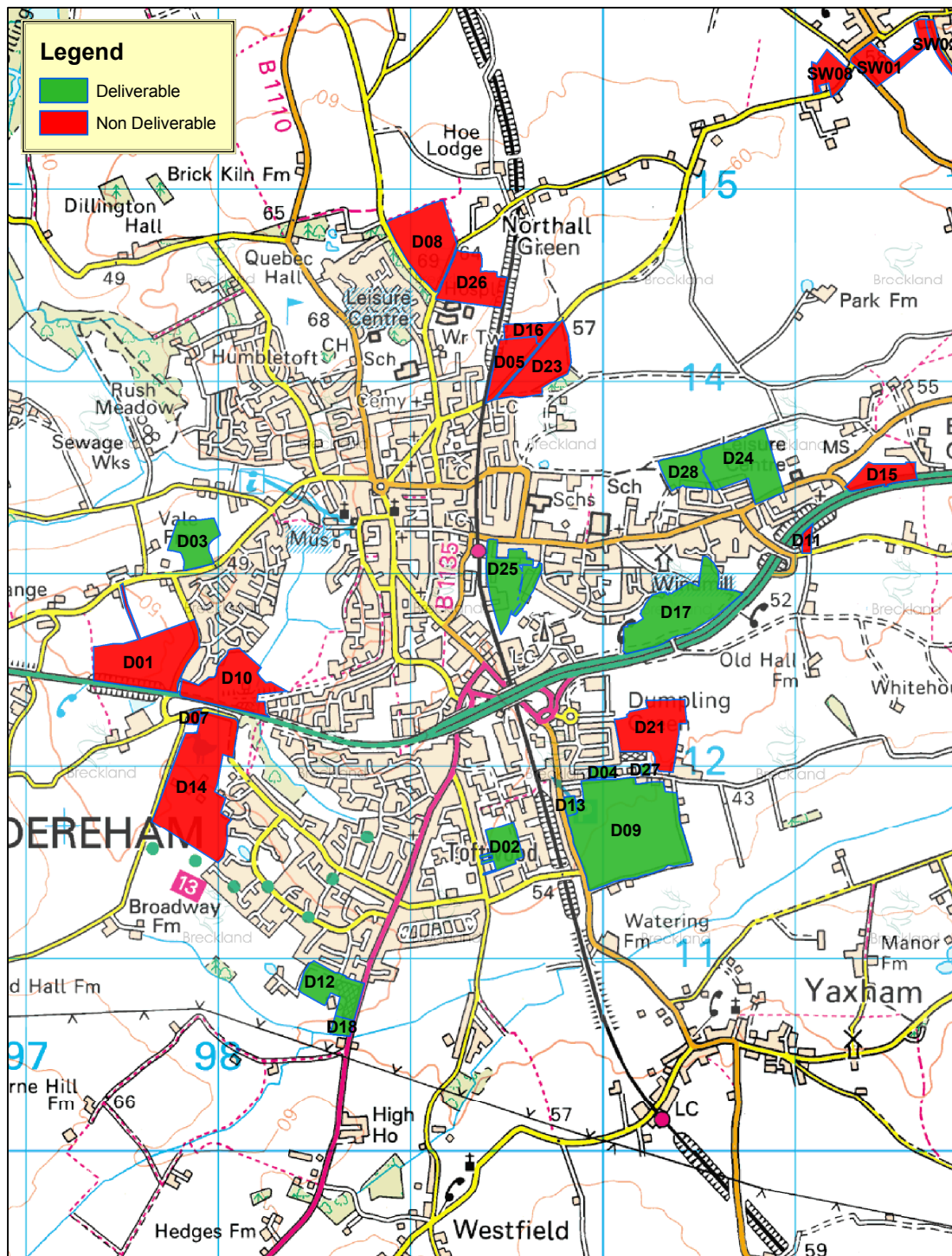
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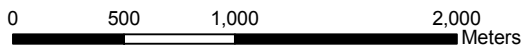
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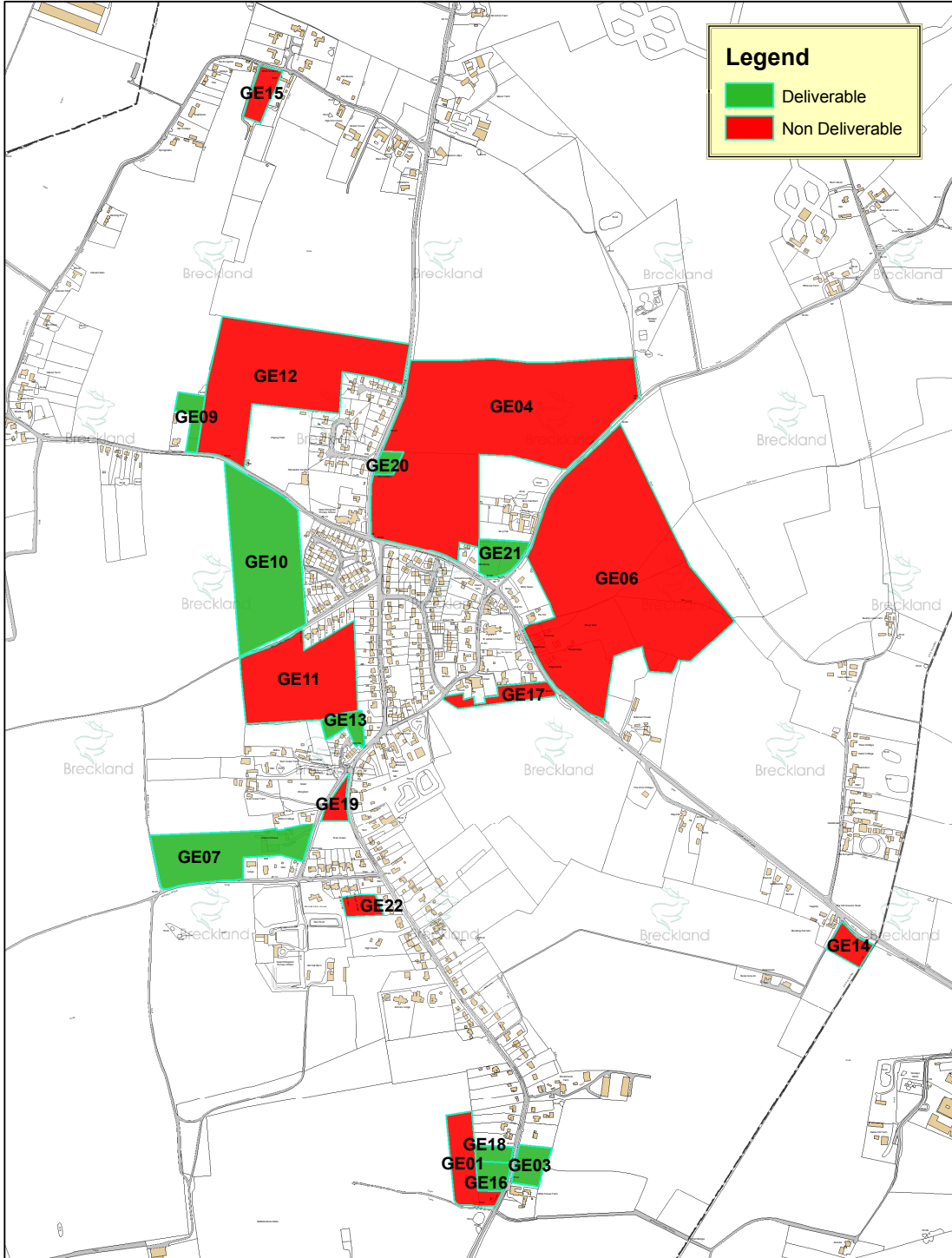




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Dereham

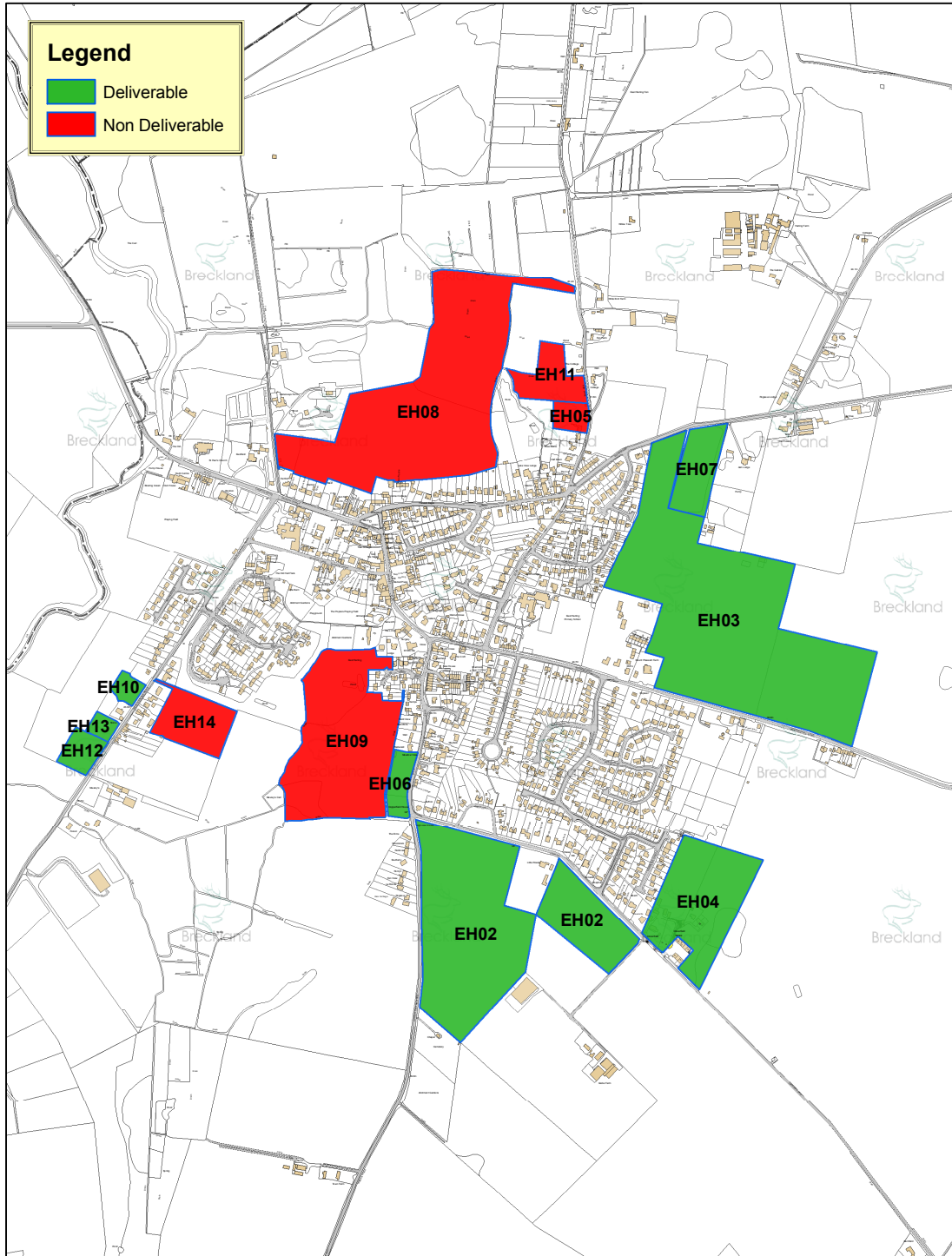


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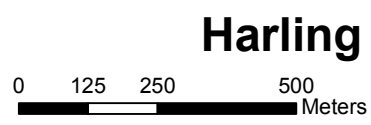


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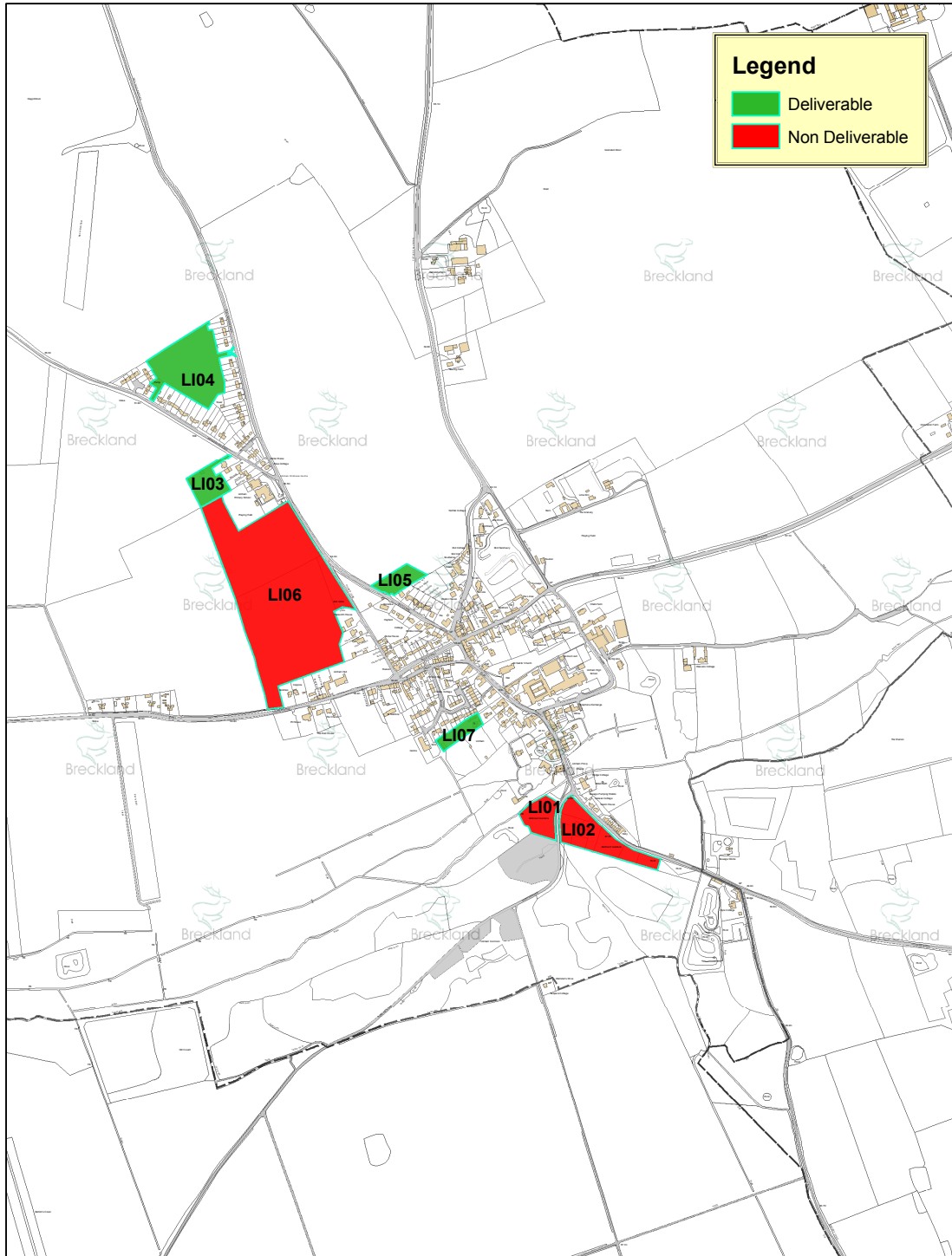


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Harling



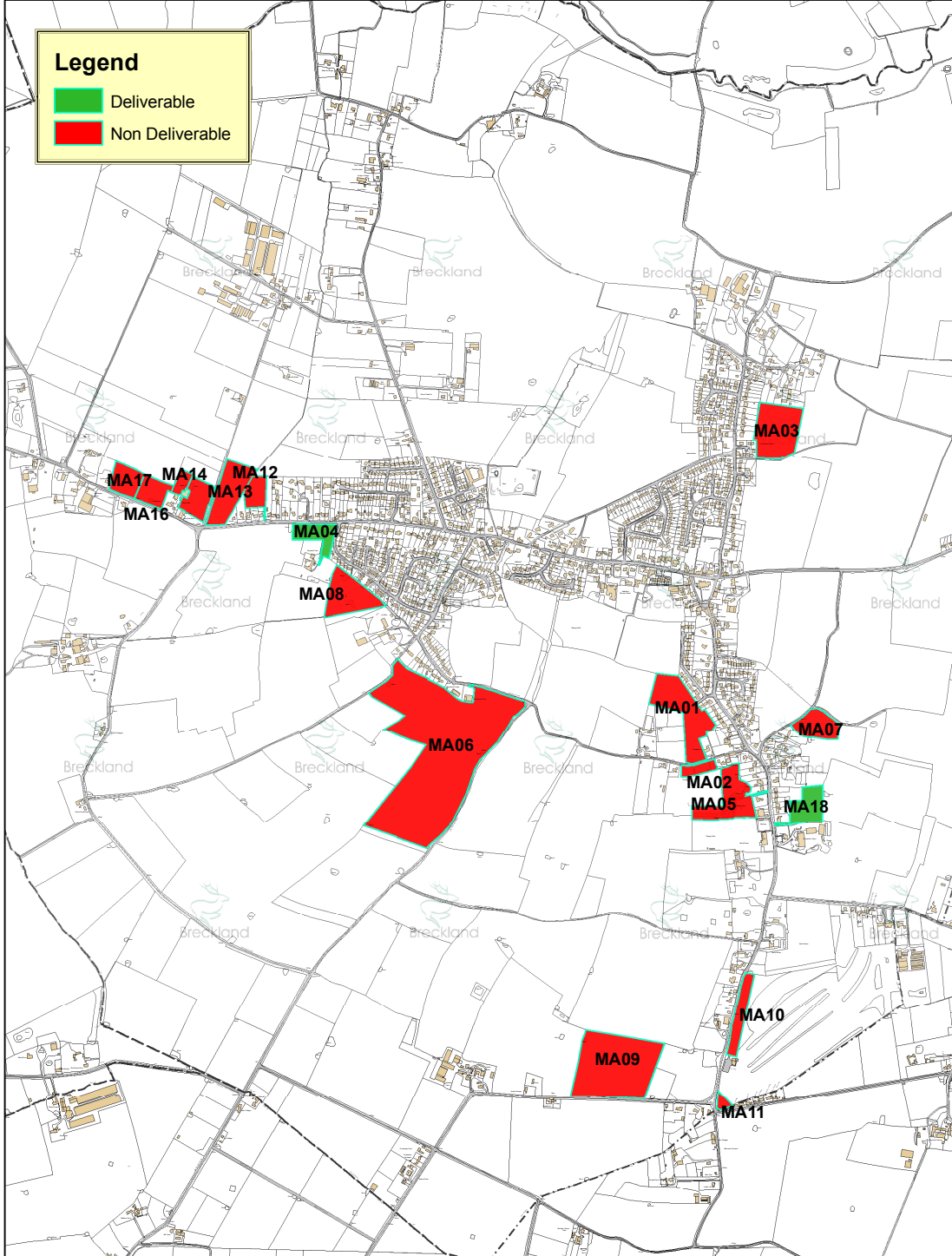


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Litcham

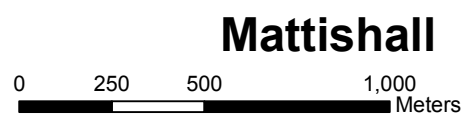


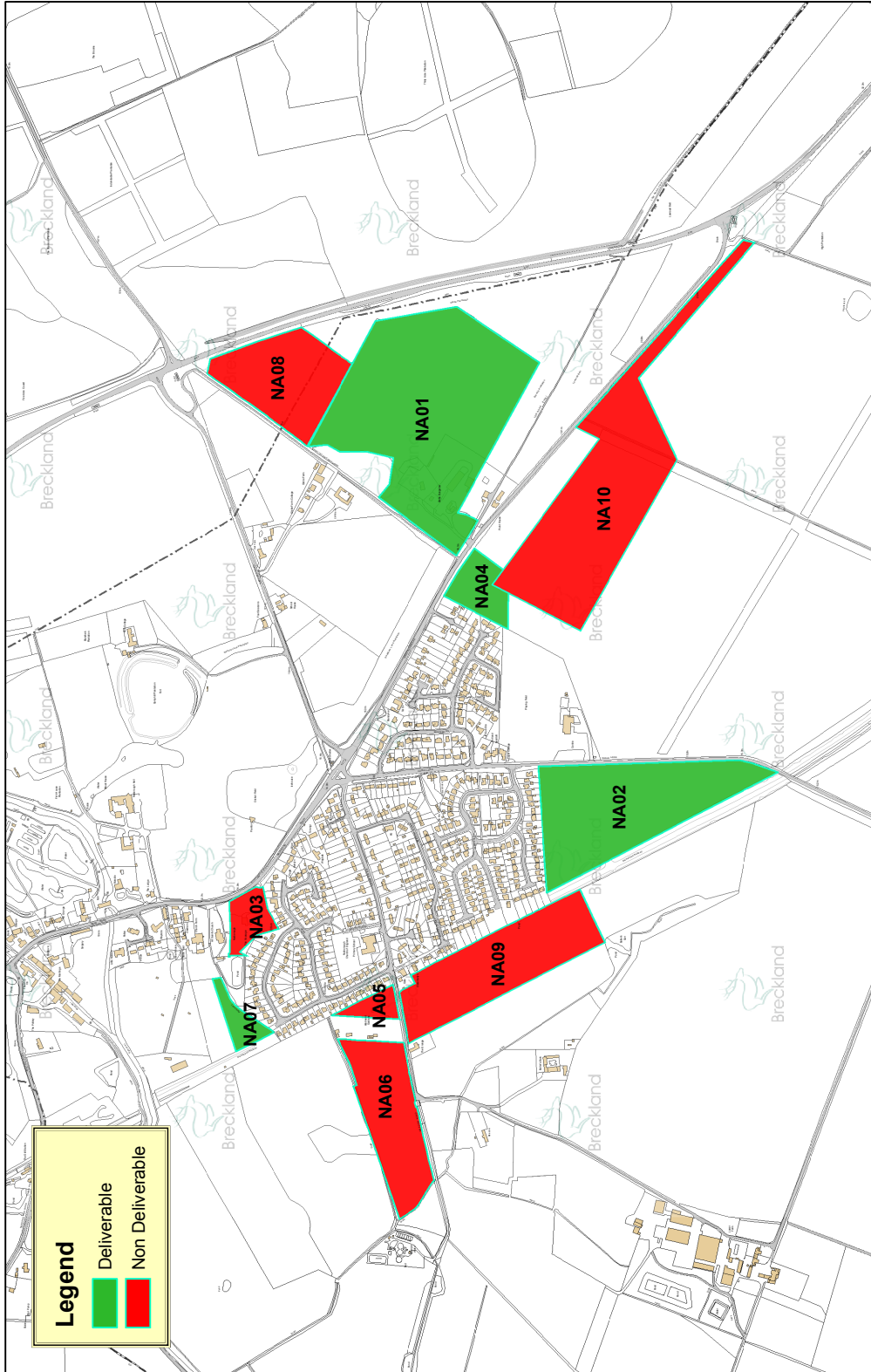


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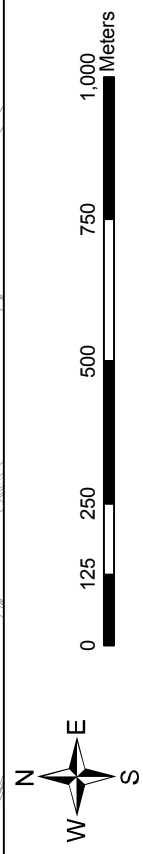
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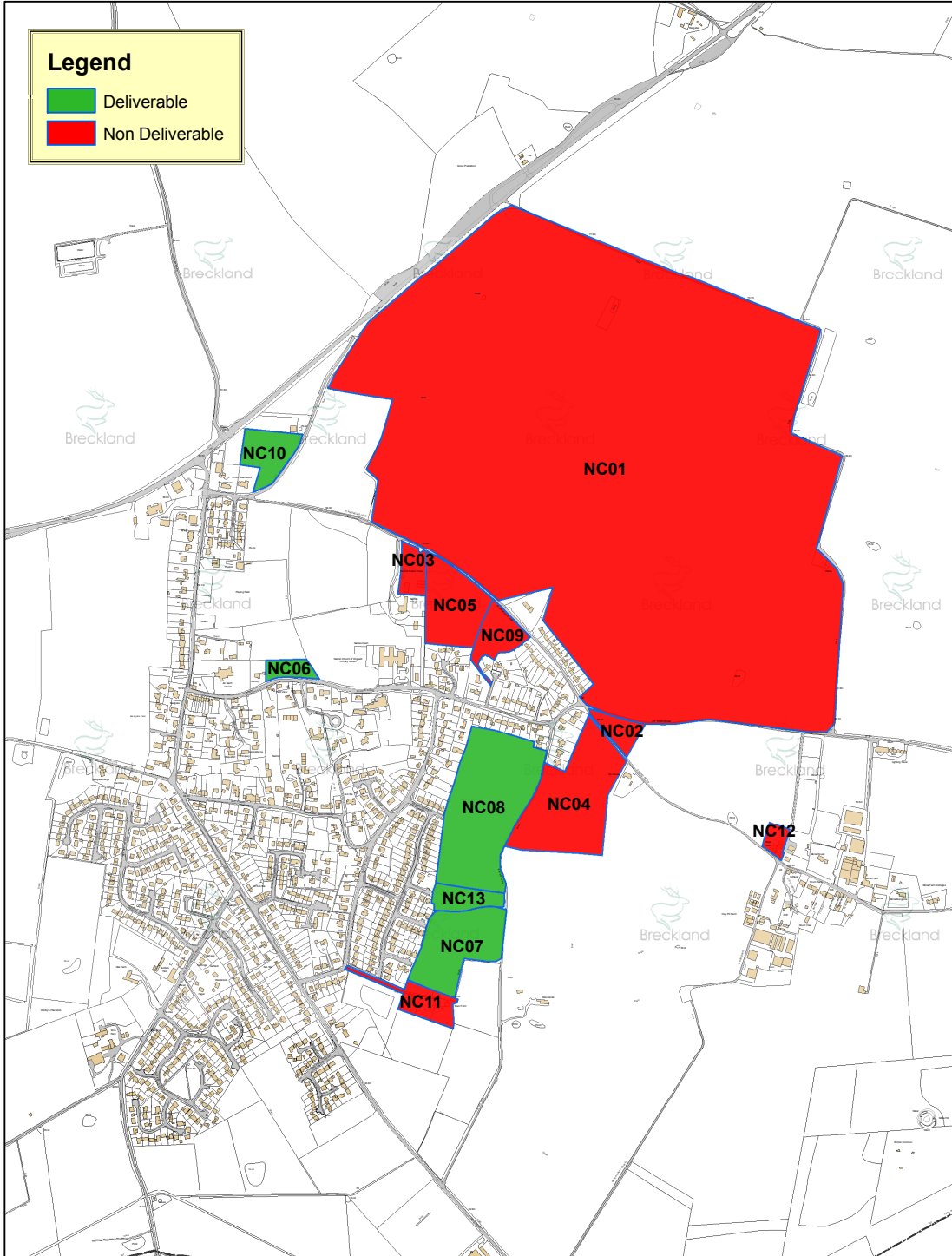




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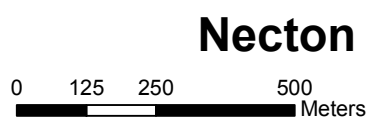
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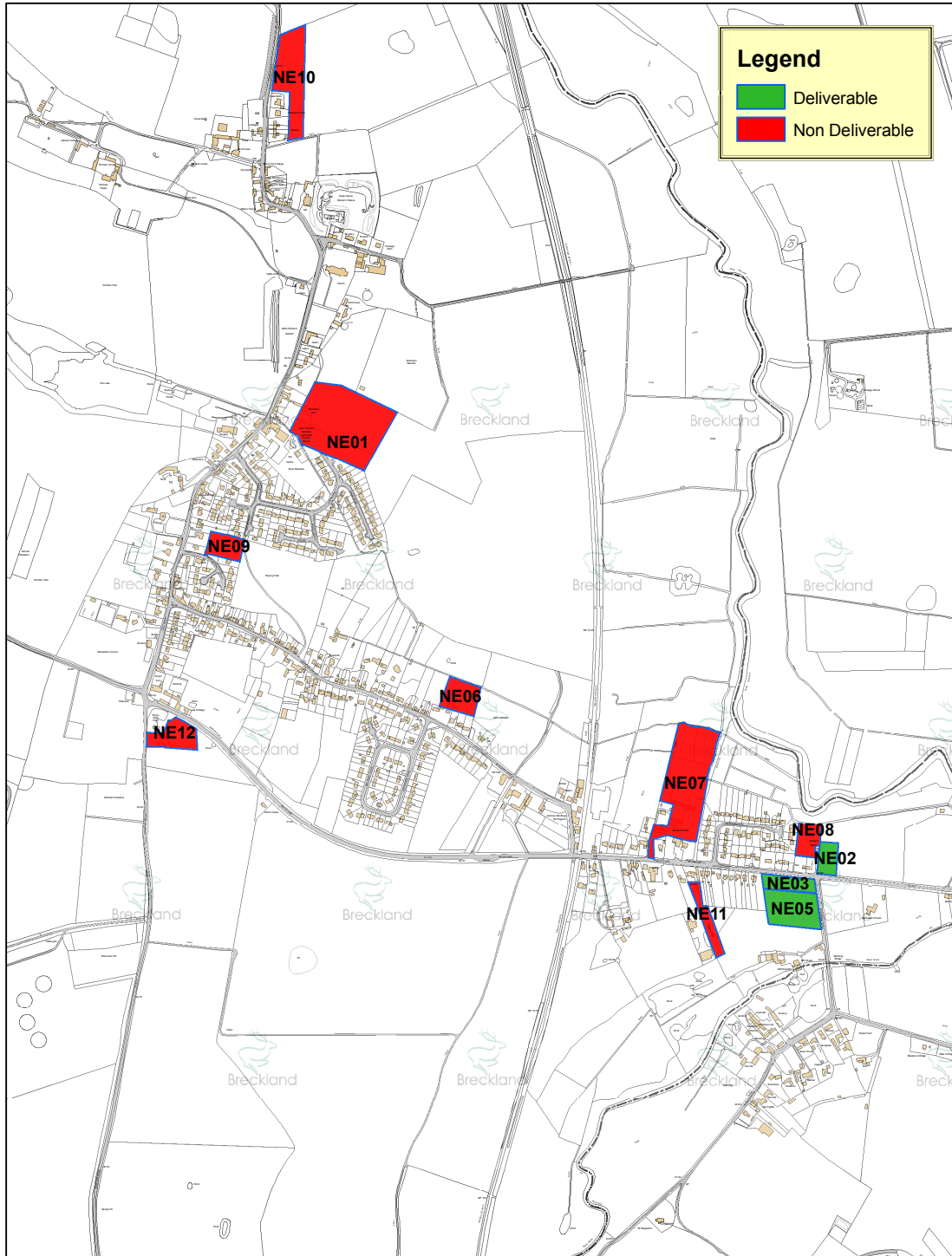


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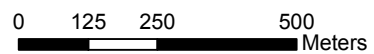


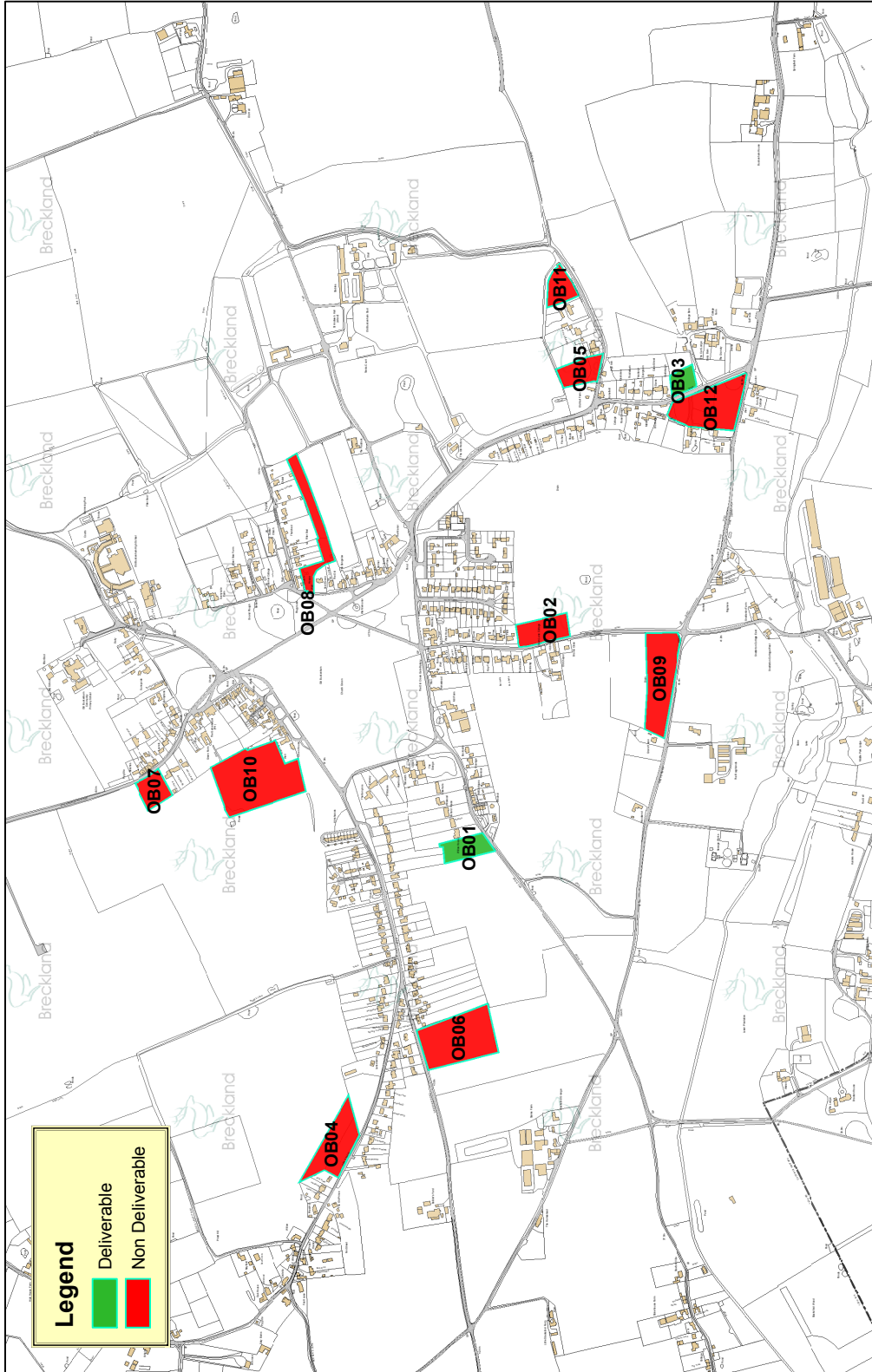


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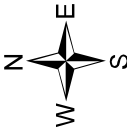


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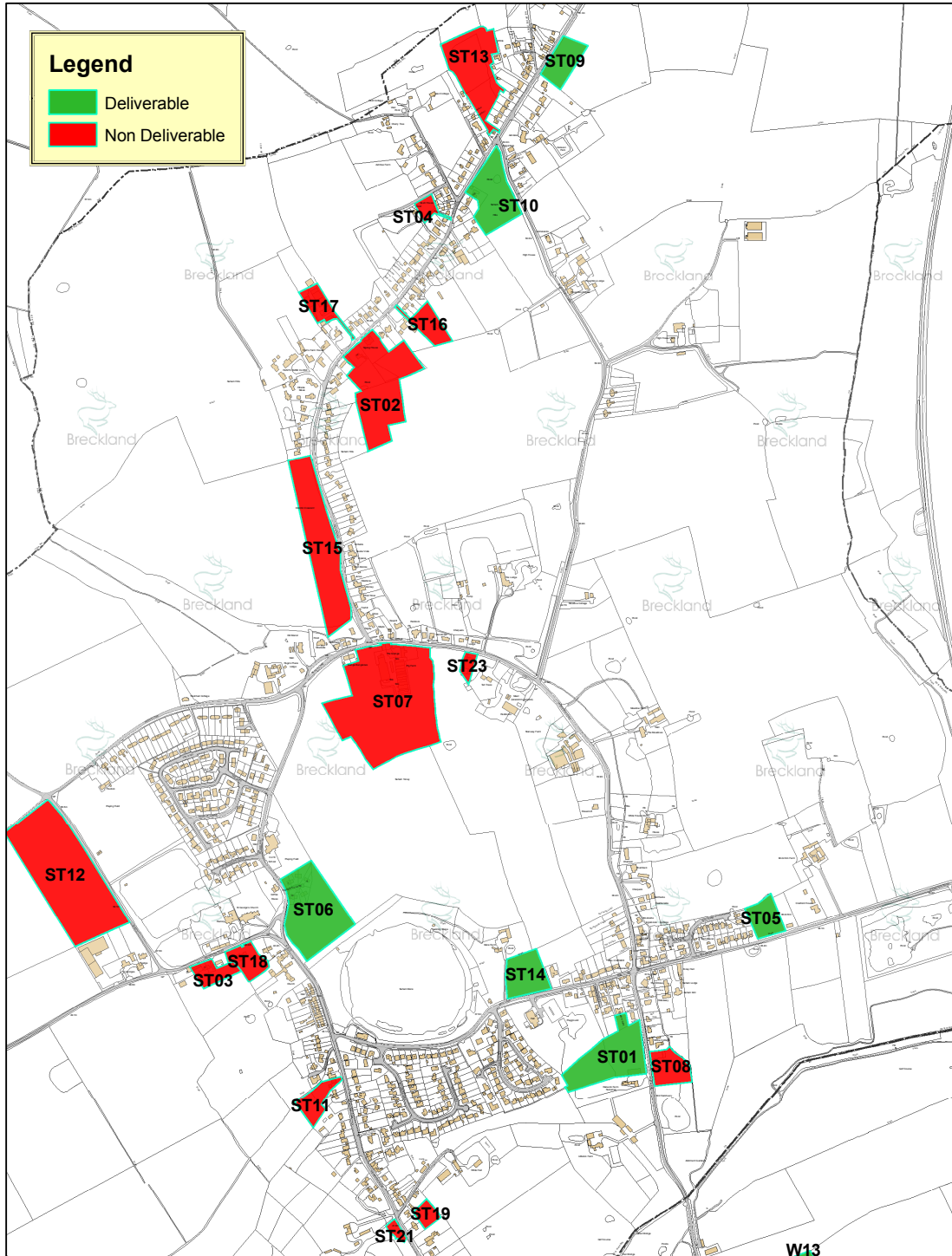




Old Buckenham



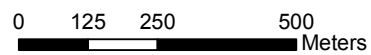
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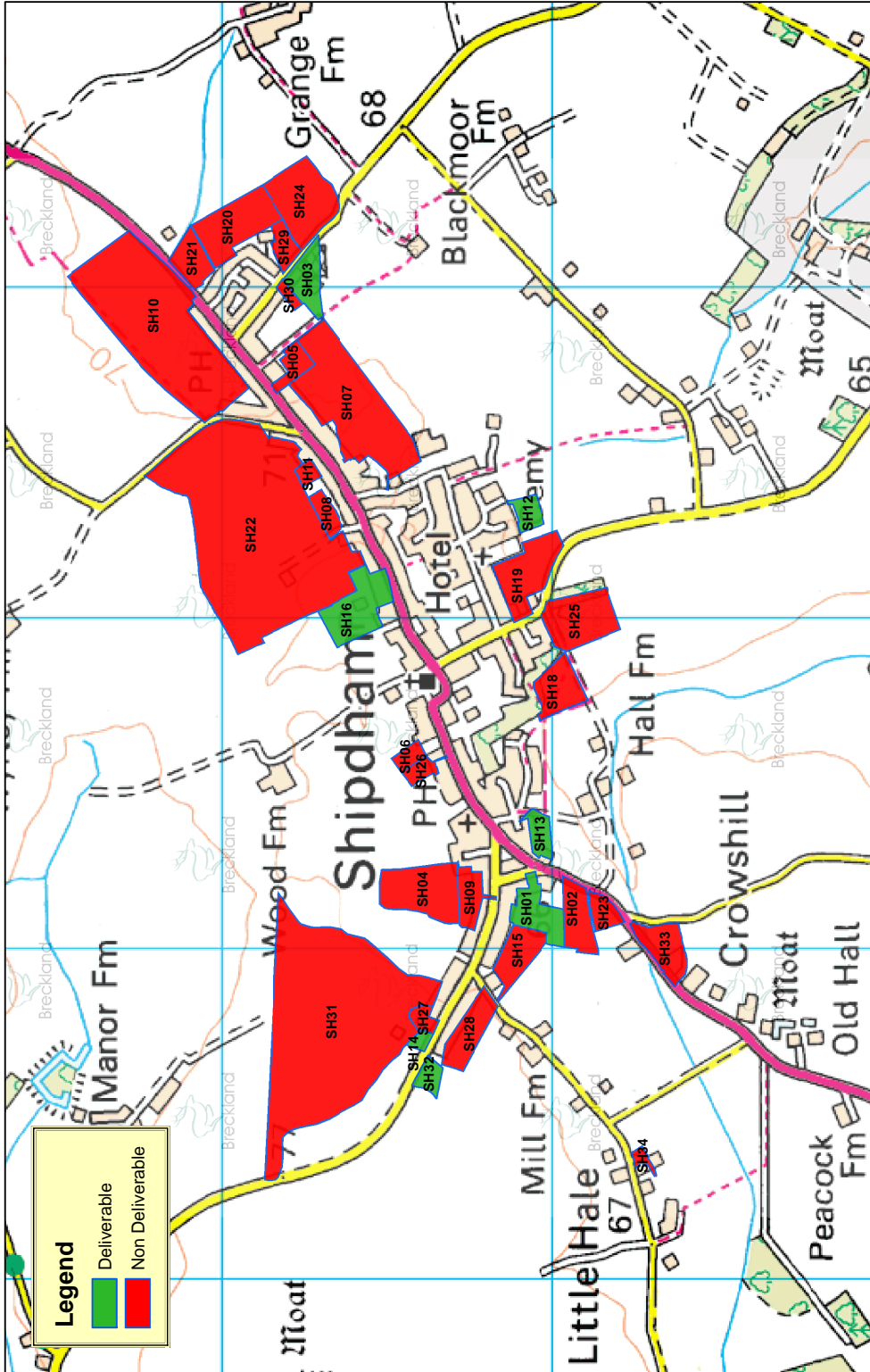
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Saham Toney



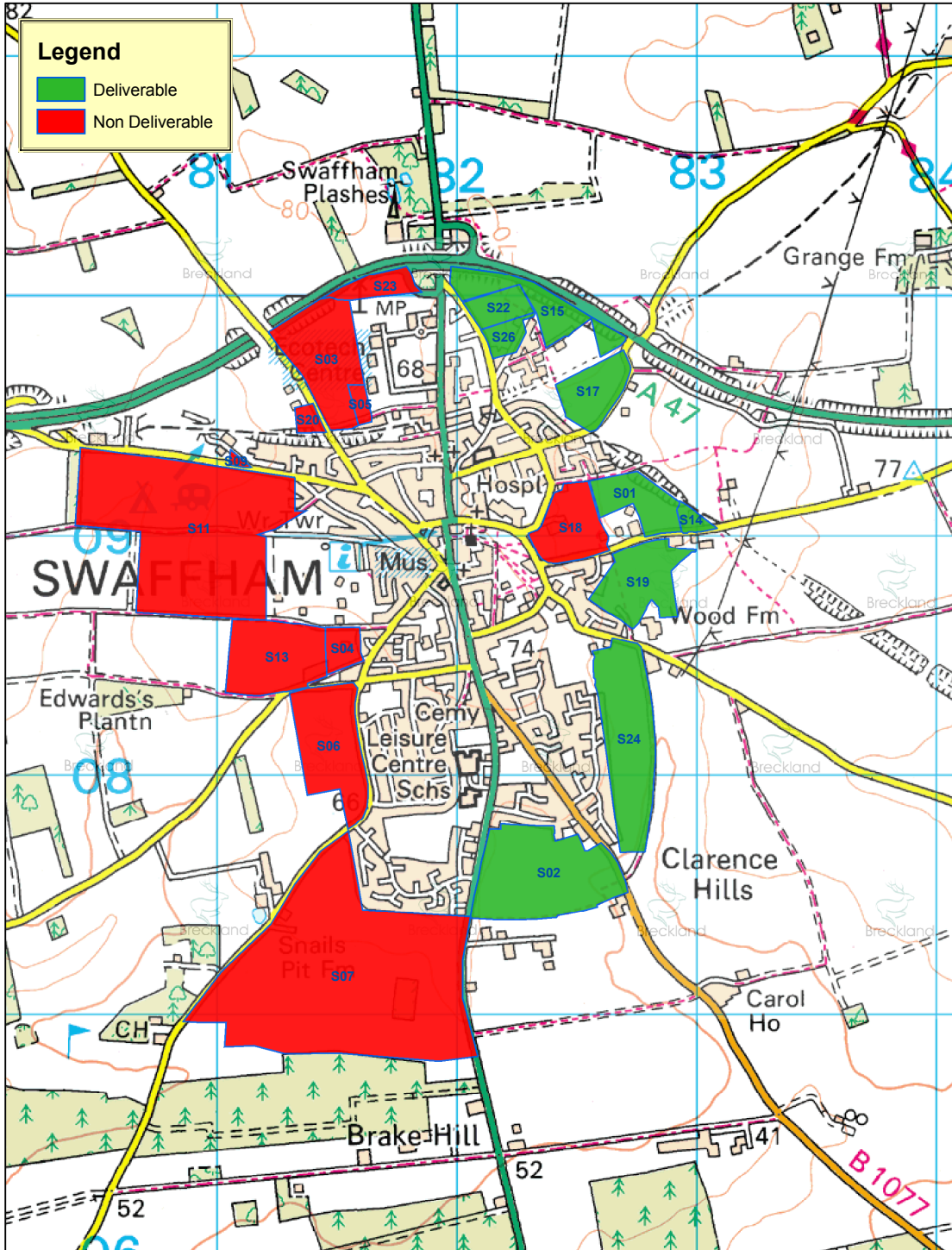




Shipdham



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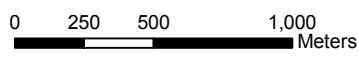
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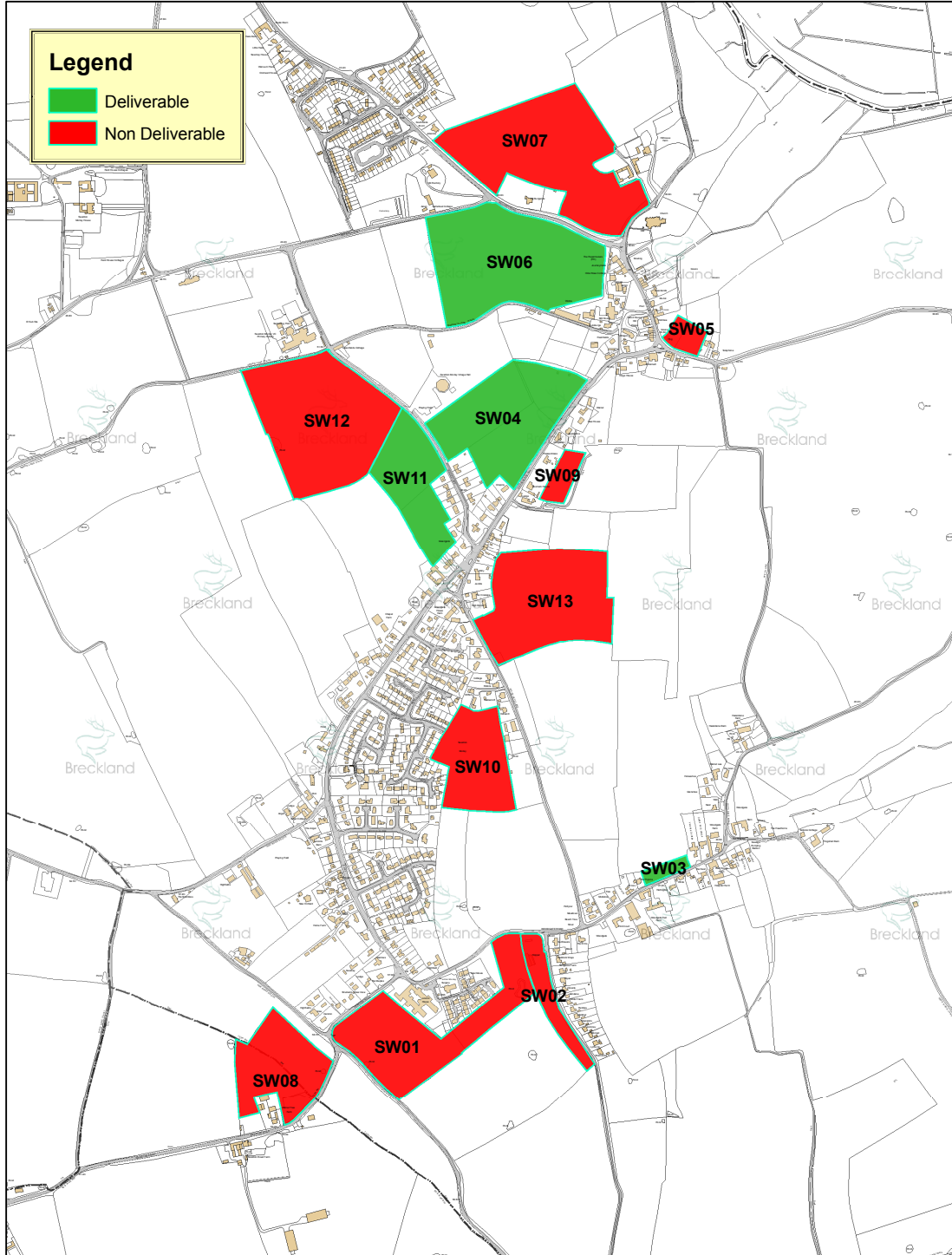
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Swaffham



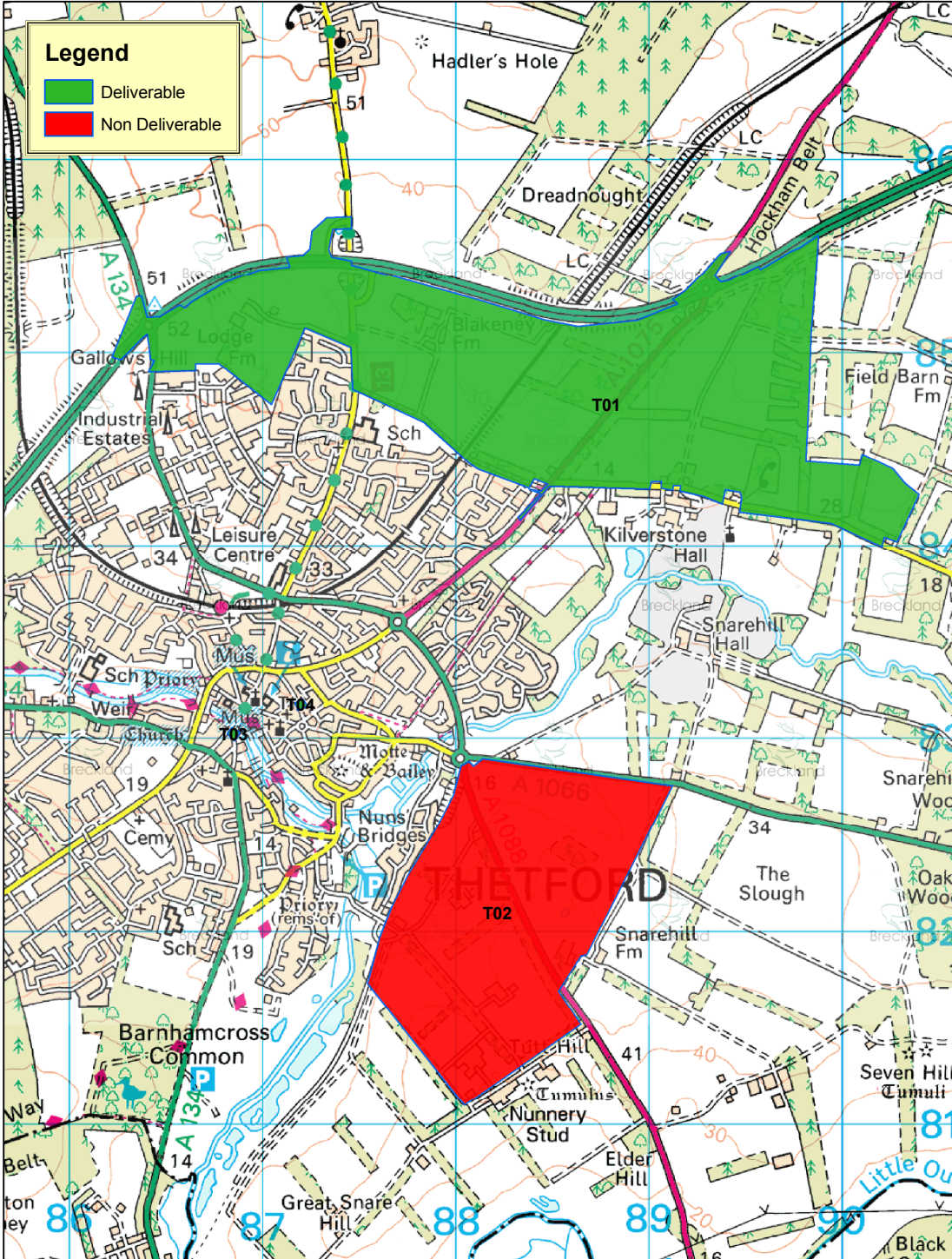


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Swanton Morley

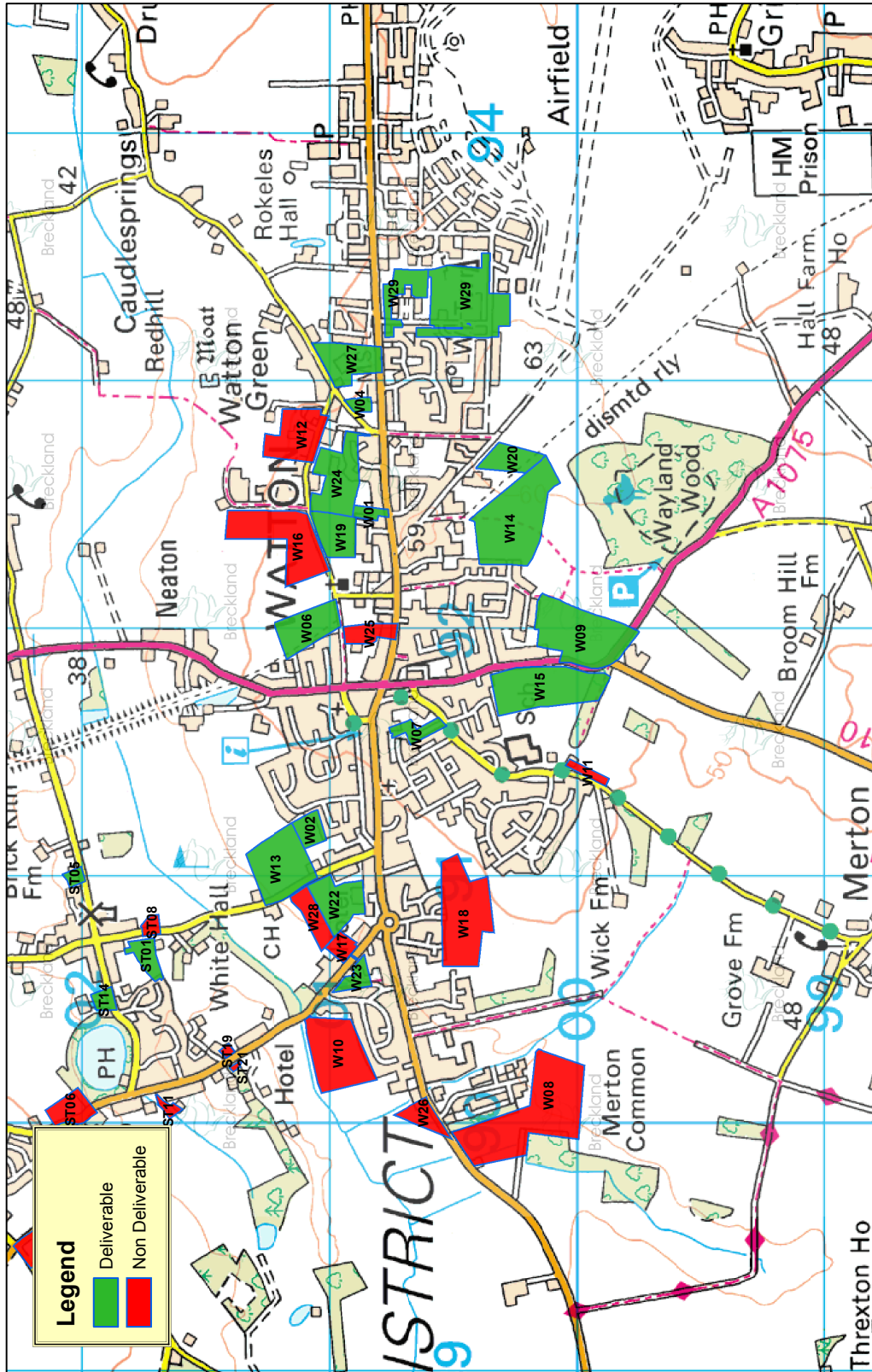
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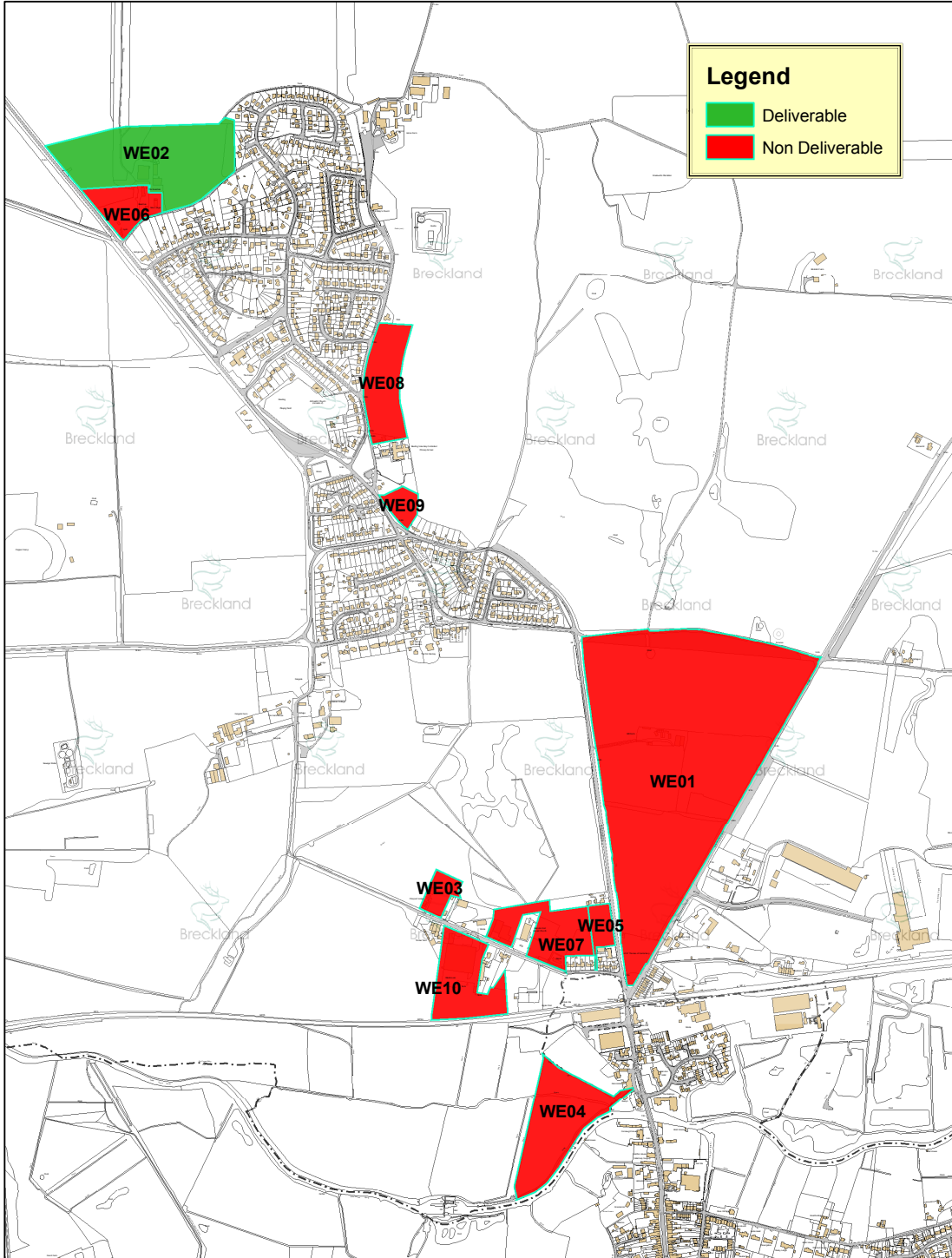


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Thetford





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Weeting

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Appendix D Suitability/Achievability Matrix

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



Appendix E Viability Model

This is an interactive spreadsheet and but is available as a separate electronic file.