



Nathaniel Lichfield
and Partners

Planning Design Economics

**Greater Norwich Development
Partnership**

**STRATEGIC HOUSING LAND
AVAILABILITY**

STAGE 7 REPORT

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Nathaniel Lichfield & Partners Ltd

14 Regent's Wharf
All Saints Street
London N1 9RL

T 020 7837 4477
F 020 7837 2277

london@nlplanning.com
www.nlplanning.com

Offices also in
Cardiff
Manchester
Newcastle upon Tyne

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1.0 Executive Summary

Introduction

- 1.1 The Greater Norwich Development Partnership (GNDP), which comprises Norwich City Council, Broadland District Council and South Norfolk District Council, commissioned Nathaniel Lichfield and Partners (NLP) to undertake a Strategic Housing Land Availability Assessment (SHLAA) Stage 7 assessment. Its purpose is to apply Stage 7 of the SHLAA Methodology set out in CLG guidance and to inform the wider SHLAA process and, in turn, the Joint Core Strategy for the three authority areas.
- 1.2 This study appraises the 515 sites that have been identified by the GNDP and other stakeholders during the initial stages of the SHLAA process by considering the **suitability**, **availability** and **achievability** of these sites for residential development in order to arrive at conclusions on **deliverability** and **developability** and set the platform for subsequent stages of the SHLAA.
- 1.3 To achieve these objectives, NLP has undertaken the following:
- An analysis of the **context** of Greater Norwich to understand the key housing market issues which will have implications for the SHLAA;
 - An assessment of the **suitability** of each site for housing development based on a range of criteria;
 - An assessment of the **availability** of each site for housing development involving an ownership consultation exercise;
 - An assessment of the **achievability** of suitable and available sites identifying where cost and market factors may inhibit development; and
 - An analysis of the **phasing** of when each site could possibly come forward for housing development based on identified issues.
- 1.4 The SHLAA is evidence feeding into the LDF and is not a substitute for the core strategy and allocations process which will consider strategic principles, the housing market and other factors. Not all sites identified as suitable, available or achievable can therefore expect to be developed.

Core Outputs

- 1.5 The assessment identified the following core outputs:
- a 482 of the 515 sites were considered ultimately **suitable** for housing development, with no factors that would ultimately prevent development coming forward. This does not mean those sites will necessarily be allocated and not all site perform equally against suitability criteria;
 - b Of these 482 suitable sites, 154 were identified by landowners as being **available** immediately or within 5 years, 21 were identified as being available after 5 years and 8 were identified by landowners as not being

available for housing development. Site availability was not able to be established for 299 suitable sites. In addition, of the 482 suitable sites it was identified that 20 were under construction but not yet complete, 33 had an extant planning permission for residential use and 10 had a resolution to grant planning permission for residential use;

- c Of the 474 suitable sites identified as being available or where availability was unknown, 460 were considered to be **achievable**, with 146 considered to have an indicative start date for development within the first 5 years and 314 considered to have a start date beyond 5 years.

- 1.6 To identify a trajectory of deliverable and developable dwellings, the outputs from the results on the suitability, availability and achievability of sites were then translated into 5-year phases. This involved taking into account issues such as phasing, build rates and notional planning periods, with sites considered deliverable starting in the first 5-year tranche and sites considered developable starting in the second 5-year tranche unless specific factors for an individual site were identified.

Local Authority	2009-2014	2015-2019	2020-2024	2024+	TOTAL
Norwich	2,695	6,458	0	0	9,153
Broadland	12,252	34,848	11,724	20,373	79,197
South Norfolk	14,395	33,364	5,175	7,466	60,400
Total	29,342	74,670	16,899	27,839	148,750

Table 1 Executive Summary Indicative Dwelling Completion Trajectory

- 1.7 This trajectory is an aggregation of outputs on individual sites and is not an illustration of anticipated overall build rates across the three authorities. There will be market capacity and other factors (not least site selection within the spatial strategy) which will identify which sites will be developed and when these will come forward. The numbers actually developed in each phase will depend on the LDF and will therefore be lower.

- 1.8 Table 2 summarises the number and total capacity of the sites and their indicative start period for each authority.

Site Classification	Norwich		Broadland		South Norfolk	
	Total Sites	Total Capacity	Total Sites	Total Capacity	Total Sites	Total Capacity
Total Sites (Start Within 5 Years):	24	3,327	48	26,754	74	20,926
Total Sites (Start Beyond 5 Years):	88	5,826	106	52,443	122	39,474
Total Not Deliverable or Developable:	13	544	19	7,224	23	20,432
Totals:	125	9,697	171	86,421	219	80,832
of which Suitable:	117	9,664	157	80,696	208	72,304

Table 2 Executive Summary Supply of Sites

Conclusions

- 1.9 In total, it is estimated that the GNDP area potentially has an unconstrained housing capacity of **148,750 dwellings, of which 29,342 could be deliverable in the first five years**. This represents the total capacity of the sites identified as being potentially appropriate for the delivery of housing development. The indicative trajectory is the output of whether and when the individual sites assessed have a reasonable prospect of being developed for housing, without making judgement on overall market capacity, spatial prioritisation or other legitimate planning judgements outside the scope of Stage 7 of the SHLAA.
- 1.10 There are a considerable number of suitable sites, with a substantial capacity for development of new dwellings, which the local authorities can work within. This gives scope for the GNDP to work further on the identification of availability and achievability issues to underpin the production of Joint Core Strategy and to support the making of key spatial choices for housing development within the GNDP area.

2.0 Introduction

Scope of the Study

- 2.1 This Strategic Housing Land Availability Assessment (SHLAA) Stage 7 Study has been commissioned by the Greater Norwich Development Partnership (GNDP), which comprises Norwich City Council, Broadland District Council and South Norfolk District Council. Its purpose is to apply Stage 7 of the SHLAA Methodology set out in CLG guidance to inform the wider SHLAA process and, in turn, the Joint Core Strategy and Site Allocations DPD for the three authority areas.
- 2.2 In achieving this objective, this study appraises the sites that have been identified by the GNDP and other stakeholders during the initial stages (no.s 1-6) of the SHLAA process by considering the **suitability, availability** and **achievability** of identified sites for residential development in order to arrive at conclusions on **deliverability** and **developability** and set the platform for subsequent stages of the SHLAA. This report does not present the overall results of the SHLAA process, and should be read in conjunction with other components of the SHLAA evidence produced by the GNDP.
- 2.3 SHLAAs have emerged as having a critical role within the planning system and are particularly important in contributing towards the delivery of housing in accordance with the requirements detailed within Regional Spatial Strategies (RSS). They form part of the evidence base to Local Development Frameworks (LDF) and represent an important basis by which local planning authorities can meet the requirements of PPS3 in respect of:
- a the identification of specific, deliverable sites for the first five years of a plan. This requirement is to be topped up over time in response to market information;
 - b the identification of specific, developable sites for years 6-10 and ideally years 11-15, in order to enable to first five year supply to be topped up over time; and,
 - c the indication of broad locations for future growth over the longer term (years 11-15) where it is not possible to identify specific sites for this period.
- 2.4 Emphasising the importance of identifying sufficient sites for development, PPS3 states that Local Development Frameworks should not include an allowance for windfalls in the first 10 years of the plan unless there are justifiable local circumstances that prevent specific sites being identified.
- 2.5 These requirements highlight the specific importance of Stage 7 of the SHLAA. In order to comply with the requirements of PPS3, the identified sites must be deliverable – that is, they must be suitable for residential development and

capable of accommodating development within a relatively short time frame. An understanding of these matters – which will stem from this study – is dependant upon a clear understanding of the suitability, availability and viability of land for development.

- 2.6 In addition to drawing upon the work that has been undertaken by the GNDP in the initial stages of the SHLAA, this study will also help inform the final stages of the process (Stages 8, 9 and 10) by highlighting whether it is necessary to identify and assess the housing potential of broad locations and to determine the housing potential of windfall sites.

Purpose of the Study

- 2.7 It should be noted that, as an evidence base document, the SHLAA is only one input into the LDF process and will sit along side other evidence base documents which will allow the GNDP to make informed policy decisions. Particularly in relation to the scope of the study it should be noted:
- a that the SHLAA does not allocate land for development, it merely highlights the potential of land for residential development;
 - b that the SHLAA is not, and is not intended to be a proxy for a Site Allocations DPD; and
 - c that the SHLAA sites assessments and scoring uses an agreed, objective and consistent methodology which seeks to capture information on constraints as they exist now and not to take any account of developer intentions, ability or aspirations to overcome or mitigate them.
- 2.8 The purpose of Stage 7 is to assess the suitability, availability and achievability of each potential site put forward for residential use. Using this information, a judgement can then be made on whether or not the site can be considered to be deliverable or developable for housing. Paragraph 33 of the CLG guidance defines each of these terms:
- “Deliverable** – A site is available now, offers a suitable location for housing development now and there is a reasonable prospect that housing will be delivered on the site within five years from the date of adoption of the plan*
- Developable** – A site should be in a suitable location for housing development, and there should be a reasonable prospect that it will be available for and could be developed at a specific point in time”.*
- 2.9 In assessing the deliverability or developability of the sites, CLG guidance (Paragraphs 37 – 40) requires consideration of the following factors:
- **Suitability** for Housing – including policy restrictions, physical problems, potential impacts and the environmental conditions (Stage 7a);
 - **Availability** for Housing – no evidence of legal or ownership problems (Stage 7b); and

- **Achievability** for Housing - a judgement about the economic viability of the site affected by market factors, cost factors, and delivery factors (Stage 7c).

2.10 Stage 7 of the SHLAA looks into each of these factors and seeks to identify sites which will have the potential for development over the plan period and which can be considered within the LDF process. NLP has based the Stage 7 Study methodology upon the CLG guidance and the GNDP methodology.

Structure of Report

2.11 This report, which is focused upon answering the key questions for Stage 7 posed by the CLG Guidance, is structured as follows:

- Section 3.0 – Study Context
- Section 4.0 – Methodology
- Section 5.0 – Parameters, Source Data and Database
- Section 6.0 – Suitability
- Section 7.0 – Availability
- Section 8.0 – Achievability and Overcoming Constraints
- Section 9.0 – Deliverability and Developability
- Section 10.0 – Conclusions

2.12 The appendices provide more information on background data and on the assumptions made. The appendices include:

- Housing Market Review
- Stakeholder Workshop Review
- Suitability Assessment Matrix
- Source Data
- Suitability Scoring Summary
- Availability Questionnaire and Letter
- Availability and Achievability Scores
- Attractiveness of Locality
- Strategic Utilities Score by Settlement
- Phasing of Sites
- Status of sites with planning permission or resolutions to grant
- Evidence for sites considered unsuitable

3.0 Study Context

Introduction

- 3.1 The purpose of this study is to inform the greater Norwich area SHLAA by providing guidance on the suitability, availability and viability of the sites that were identified by the GNDP in the initial stages of the SHLAA process. It will contribute to the evidence base for the Joint Core Strategy and will therefore serve an important role in the delivery of new housing within the greater Norwich area, in accordance with the requirements set out in the East of England Plan.
- 3.2 PPS12 requires Core Strategies to be rooted in a thorough evidence base which is:
- “proportionate to the job being undertaken by the plan, relevant to the place in question and as up-to-date as practical having regard to what may have changed since the evidence was collected”.* (PPS12, paragraph 4.37)
- 3.3 It is therefore essential that the evidence base takes adequate account of the key contextual issues which influence the delivery of housing in the greater Norwich area at this time and in the future. The background issues upon which the study is based are likely to vary in terms of geographical and temporal scales: they might be locally specific or relate to a broader area and they might represent recent changes or more longstanding trends.
- 3.4 This chapter identifies a number of key issues that will influence house building within the Greater Norwich area over the Joint Core Strategy period. These relate to the character of the area, the need for housing and the supply of housing in the current (and anticipated future) market context.

Greater Norwich Area

- 3.5 The study area comprises the local authority areas of Norwich City, Broadland and South Norfolk, and these have distinct characteristics which will affect the type of sites likely to come forward for housing development and how the SHLAA process will accommodate these:
- **Norwich** is a predominantly urban area, with an historic city core and extensive suburban areas which extend into the neighbouring authorities. Due to its urban nature many of the sites coming forward with potential for housing are likely to be smaller, infill sites, with the majority being brownfield opportunities.
 - **Broadland** is a predominantly rural area with a number of small market towns. A portion of the area is covered by the Norfolk Broads meaning some areas will be unsuitable for housing development. Sites that come

forward with potential for housing are likely to either be smaller sites in the villages and towns, but also strategic expansion areas on the edge of built-up areas.

- **South Norfolk** is also predominantly rural in nature, although has a number of market towns, including the larger towns of Wymondham and Diss. This means that sites that come forward with potential for housing are likely to be either smaller sites in the villages and towns or strategic expansion areas. There may also be larger brownfield sites in the towns.

- 3.6 The area is bordered by the Norfolk and Suffolk Broads, the UK's largest nationally protected wetland, which extends well into the study area, into Norwich City, and is recognised for its environmental qualities. These include nationally defined landscape character areas and large areas of internationally important wildlife sites such as Special Areas of Conservation (SACs), Special Protection Areas (SPA) and Ramsar sites for wetland importance. There are also many nationally important Sites of Special Scientific Interest (SSSIs) and national and local wildlife sites across the area.
- 3.7 The study area also benefits from a high quality built environment which includes a very large number of important historic buildings, 1,500 of which (including two cathedrals and a Norman Castle) are located within the walled centre of Norwich. Broadland and South Norfolk also contain a number of historic market towns, villages and landmark historic buildings.
- 3.8 The nature and quality of the natural and built environment of the greater Norwich area will have a substantial bearing upon the future delivery of housing, in terms of the potential location of development and the scale of development that can reasonably be accommodated within any particular location. Whilst acting as a potential barrier to the level of development that can be achieved, the attractiveness of the greater Norwich area also serves to fuel demand for housing as large numbers of people are attracted by the quality of the local environment. This creates a potential conflict in the supply of and demand for housing, the policy implications of which should be carefully assessed as part of the Joint Core Strategy preparation process.

Implications for Stage 7 of the SHLAA:

The characteristics and nature of the three local authority areas will have an impact on the types of sites coming forward for housing development. This will have implications for the relative suitability of sites for housing development across the Greater Norwich Area.

The Housing Market

- 3.9 Consideration of the aspects of the housing market in greater Norwich is key to understanding and underpinning which sites are likely to be deliverable or developable for housing. The issues around the housing market and the analysis undertaken underpin many of the assumptions made in assessing the achievability of housing development on specific sites. A summary housing

market review is contained in Appendix 1, with the salient points summarised in this section.

Existing Housing Context

- 3.10 The greater Norwich area is home to 365,000 people living in 150,000 households. Of this total, 230,000 people live within the Norwich Policy Area. It is anticipated that by 2025 the population of the Norwich Policy Area will have risen to 280,000.
- 3.11 The area comprises 10 housing market areas, as shown below:

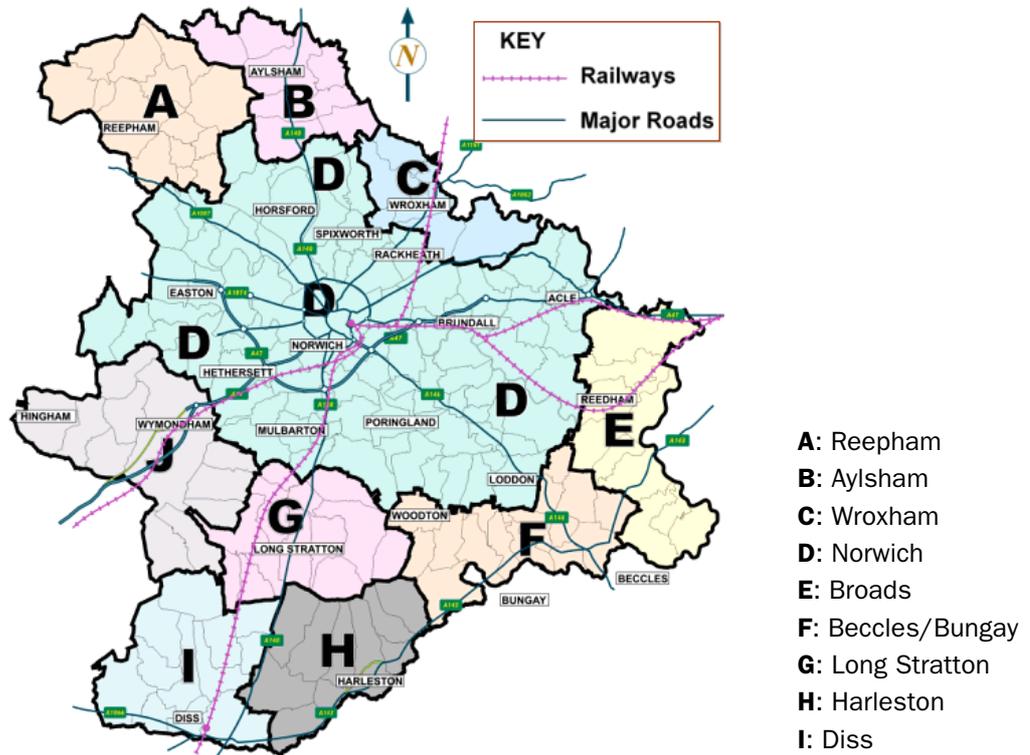


Fig 1 Greater Norwich Housing Market Areas

Source: Greater Norwich Housing Market Assessment (September 2007)

- 3.12 The housing market areas do not operate independently from one another although they do have individual characteristics. The largest housing market area (Norwich) covers 50% of the greater Norwich housing market area and is home to 75% of its population. Eight of the other housing market areas are centred on market towns whilst the Broads area has no clear centre.
- 3.13 Norwich City is the main focus for economic and other activity in the area, although relative shortages of potential development land limit the level of new housing that might be capable of being accommodated within the City. This is highlighted by the comparatively low growth since 1991 in the housing stock against that experienced in South Norfolk and Broadland.

- 3.14 The nature of Norwich and this housing trend has extended the Norwich housing market area into the surrounding districts and it is likely that these trends will continue, potentially exacerbated by the current housing market collapse. A large proportion of Norwich's housing stock comprises apartments which has been hit disproportionately hard by the housing market collapse and is expected to take longer to recover. This is because of a perceived oversupply of this type of accommodation and the complexities of delivery. The implication is that the supply of dwellings from the apartment sector will fall, with potentially a reduction in densities as developers seek to move away from these types of schemes in the short term. This will have both an impact on flatted schemes in the development pipeline as well as the viability of these types of development on town/city centre and other brownfield sites in the future.
- 3.15 Clear differences in housing types also exist across the area. In planning for future residential development, it will be important to assess whether the characteristics of the future supply should mirror those of the existing stock, or whether they should better reflect future demographics and market deliverability. The SHMA considers the anticipated nature of demand but market changes mean that the likely characteristics of the new housing supply might need to be reconsidered. This will have an impact on the types of sites likely to come forward and on the timing of their delivery, given the uncertain economic future.

Implications for Stage 7 of the SHLAA:

The market for apartments has been hit disproportionately hard in the current recession, with the implication that sites most appropriate for higher density development are unlikely to come forward in the shorter term, particularly with an established trend of higher growth levels in surrounding areas.

Future Housing Requirements

- 3.16 The Regional Spatial Strategy for the East of England sets out the housing requirement for the greater Norwich area. This represents a starting point for the LDF in respect of the need to make adequate provision to achieve the specified housing levels.

Local Authority Area	Minimum to build (April 2001 – March 2021)	Built (April 2001 – March 2008)		Remaining Requirement	
		Total	Per Annum	Total	Per Annum
Norwich	14,100	5,484	783	8,616	663
Broadland	12,200	2,375	339	9,825	756
South Norfolk	11,200	4,107	586	7,093	546
	37,500	11,966	1,708	25,534	1,965

Table 3 East of England Plan Housing Requirement for Greater Norwich Area

- 3.17 Levels of housing development in Norwich over the first 7 years of the RSS period have been above the per annum requirements, with the remaining per annum requirement lower than the previous trend of completions. Whilst levels of housing development in South Norfolk over the first seven years of the RSS period was broadly equivalent to the level that is required over the remaining years of the Plan period, it is clear that a step change in the level of provision is required for Broadland, which will potentially be compounded by the effects of the recession.
- 3.18 The designation of Norwich as a Growth Point has cemented the identification of this area as a major housing growth location. The Joint Core Strategy anticipates that 33,000 of the homes required by the RSS will be provided in the Norwich Policy Area and that the remaining 4,500 will be located in rural areas. In order to provide a basis by which the housing requirement might be extended to 2026, it also states that in addition to the RSS figures a further 9,000 homes are required in the Norwich Policy Area whilst an additional 1,500 homes are to be provided in rural areas by 2026.
- 3.19 The delivery of this considerable scale of growth is likely to be challenging, particularly the requirement of local authorities to identify sufficient land suitable to accommodate the number additional dwellings required and ensuring this can come forward in a phased delivery. The SHLAA has an important role in helping to inform the local authorities' decision making and policy trade-offs in identifying land.

Implications for Stage 7 of the SHLAA:

The outputs of the Stage 7 assessment will need to be considered against the RSS requirements to ensure sufficient sites are identified to meet the requirements, otherwise additional sites may need to be identified and tested. Stage 7 does not seek to identify which specific sites should be allocated to meet the housing targets, merely which ones are realistically capable of delivering housing.

Housing Affordability

- 3.20 The housing market in the greater Norwich area has traditionally been strong, with housing demand fuelled by falling household sizes and relatively high levels of in-migration. In general, in-migrants have been better able to compete within the housing market than newly forming local households and this has helped to drive up average house prices. Whilst average house prices within the area have remained below average prices for England and the East of England, a key trend in recent years in respect of housing within the study area has been a steady fall in the levels of housing affordability, although the impacts of the recession on house prices may slow or reverse this trend.

Recessionary impacts upon demand

- 3.21 Whilst the fundamentals of demand remain in the greater Norwich area, it is evident that the recession will have some short term impact upon demand. In the past, the housing market in the area has been strengthened by migration into the area and increasing levels of household formation. At a time of economic decline, a shortage of jobs might result in a substantial reduction in the level of economic-led migration. This will result in lower levels of competition in the housing market and a reduced demand for housing. However, although factors such as unemployment, economic led-migration, mortgage availability and household formulation rates do affect short term demand, they would not be expected to have a bearing in the longer term – once an economic upturn occurs the market demand for housing are likely to increase as the trends in these factors are reversed.
- 3.22 It is not expected that these benefits of recovery would be experienced at the same time and the short term prognosis remains bleak. The severity of current market difficulties – and the particular impact upon the delivery of those sources that have traditionally been dominant within the overall supply – means that RSS housing requirements are unlikely either to be achieved or substantially exceeded in the short term.

Implications for Stage 7 of the SHLAA:

The recession is having a major impact on demand for housing, and this is likely to impact on the achievability of developing housing sites in the short term.

Delivery of Housing

- 3.23 The provision of new homes and the delivery of the infrastructure required to support them is a critical issue for the creation of Sustainable Communities. However, seismic changes to the housing market have had a substantial impact upon the supply of new housing. The NHBC has reported that completions in the third quarter of 2008 have fallen by 20% compared to the same period in 2007 whilst the commencement of activity on new sites has fallen by 54%. Private sector starts have fallen by over two thirds and levels of

transactions and prices have also fallen substantially. House sales have fallen by between 60% and 65% from the level of the third quarter of 2007 with new build sales having fallen by an even greater margin. House prices have fallen by 14.6% in the ten months to October 2008 whilst the prices of new build houses have fallen by a greater margin.

- 3.24 Reductions in the availability of credit and in the short term demand for new housing have resulted in a major fall in the profitability of development. Whilst land values are now substantially lower, only sites acquired at historically low prices are viewed as likely to come forward at this time. In this context, the cost of bringing forward apartment schemes and high density housing on brownfield land can render such projects unviable. Given the significance of these sectors of housing in contributing to the overall supply in recent years, this change represents a major difficulty for future supply.
- 3.25 It is generally recognised that small to medium sized greenfield sites have the greatest potential for viability in the short term although these sites may represent a policy trade-off with such development not necessarily according with current policy aspirations.
- 3.26 Within an efficiently operating market, it is assumed that the majority of sites with planning permission will come forward for development. This assumption must now be reconsidered as there is no longer any guarantee that sites with planning permission will remain in the development pipeline. In this context, some sites with planning permission may be reviewed to incorporate alternative design and layouts or to renegotiate Section 106 agreements. Some residential sites might be released for alternative uses altogether or potentially planning permissions may lapse.
- 3.27 The review of Section 106 requirements may be an important mechanism by which viability might be improved. High requirements for affordable housing and environmental performance (amongst other things) can add substantially to the costs of development and may impact upon a site's viability. Local authorities who experience poor deliverability of sites with planning permission may want to consider mechanisms by which they can improve the viability of schemes to ensure sites come forward.

Implications for Stage 7 of the SHLAA:

The market viability of delivering housing development has fallen which will impact on the achievability of sites during the current recession. Some sites will undoubtedly prove more viable than others due to cost factors.

Conclusion

3.28

Although good progress has been made towards the RSS requirements in the greater Norwich area, it is inevitable that the level of future housing delivery will fall in the short term, although the scale of any such reductions remains unknown. PPS3 requires the five year housing supply to be retained as a rolling target, although an initial oversupply would reduce the amount of additional housing that would be required in the later years of the RSS period. However, in the context of falling development levels, there is a clear concern regarding the ability to identify sufficient available housing sites that are viable and deliverable within the next five years of the Plan period.

4.0 Methodology

Context

4.1 The Strategic Housing Land Availability Assessments Practice Guide (2007) published by the Department of Communities and Local Government (CLG) sets out a methodology for the preparation of a SHLAA. Fig 2 below is an extract from the CLG guidance and summarises each of the ten main stages of the process (Paragraph 18).

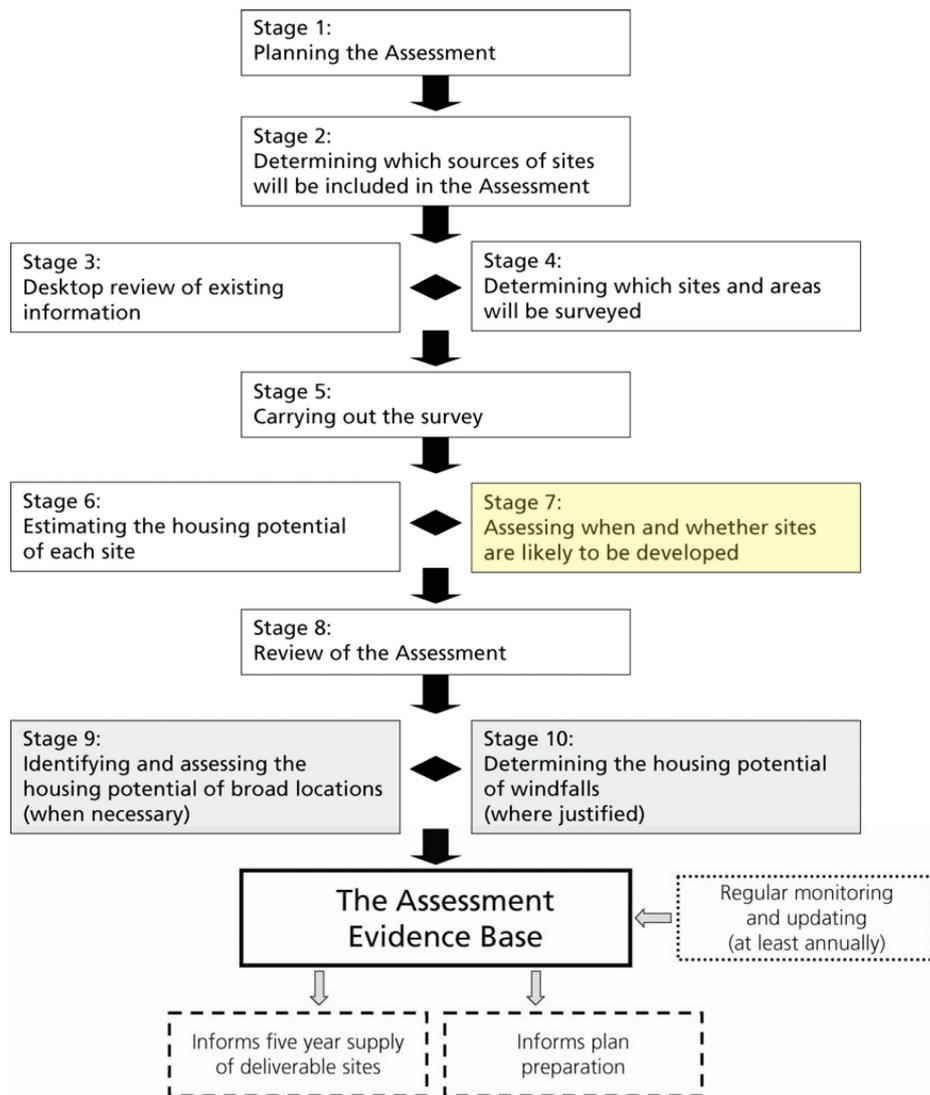


Fig 2 The Strategic Housing Land Availability process and outputs (CLG 2007)

4.2 In November 2007, the GNDP published a methodology for the SHLAA study area based upon the CLG document. The GNDP methodology sets out what tasks need to be undertaken during the SHLAA process covering each of the CLG Stages 1 to 8.

- 4.3 It was not the role of this Stage 7 study to revisit any decisions made by the GNDP SHLAA Steering Group for Stages 2-6, nor examine the reasoning or appropriateness of the following:
- a The settlements chosen to be assessed;
 - b The sources of potential sites and related to this, a review of each of the sources;
 - c The desktop or survey data collated by the GNDP (including that which informed 'suitability' judgements described below), apart from where obvious discrepancies arose through the assessment of site suitability;
 - d Any exclusions from the scope of the study;
 - e The site size thresholds for each broad location; or
 - f The density multipliers chosen for each of the broad locations.
- 4.4 With regards to point f, the Stage 7 report does make reference to the density multiplier assumptions that have been made and how this may impact upon the achievability of particular types of sites, but NLP has not sought to review them.
- 4.5 Between November 2007 and October 2008, the GNDP carried out stages 1 to 6 as set out in their methodology. In October 2008, NLP was appointed to complete Stage 7 of the SHLAA (as highlighted in Fig 2), building on the GNDP's earlier work with the objective of identifying sites which have the potential to be appropriate for the delivery of housing to meet the RSS targets. It should be noted that the SHLAA process needs to be carried out independently of the overall RSS target, i.e. the RSS requirement must not influence the outcome of the site assessments.
- 4.6 If the outcome of Stage 7 is that there are either too many or too few sites to meet the defined housing requirements, then the judgement on how this informs the LDF (e.g. on spatial priorities, or on the identification of further sites) is outside the scope of this study. Such judgement will be a matter for the subsequent stages of the LDF process.

Purpose of Stage 7

- 4.7 The purpose of Stage 7 is to assess the suitability, availability and achievability of each potential site put forward for residential use. Using this information, a judgement can then be made on whether or not the site can be considered to be deliverable or developable for housing. The definition of these terms is prescribed by national policy, as previously identified in Section 2.0.
- 4.8 Stage 7 of the SHLAA looks into each of these factors and seeks to identify sites which will have the potential for development over the plan period. NLP has based the Stage 7 Study methodology upon the CLG guidance and the GNDP methodology.

Applying the key tests - Decision Tree

- 4.9 The SHLAA process is effectively one through which a series of tests are applied to a number of sites. For the purposes of Stage 7 of the SHLAA, NLP has applied the following diagnostic tool, effectively a decision tree, which describes the approach taken.
- 4.10 It effectively seeks to illustrate how the different tests, applied to different sources of sites (those new sites identified, those already with planning permission, and those under construction) are considered to arrive at a conclusion on the extent to which they are deliverable or developable, and to inform a phasing judgement.

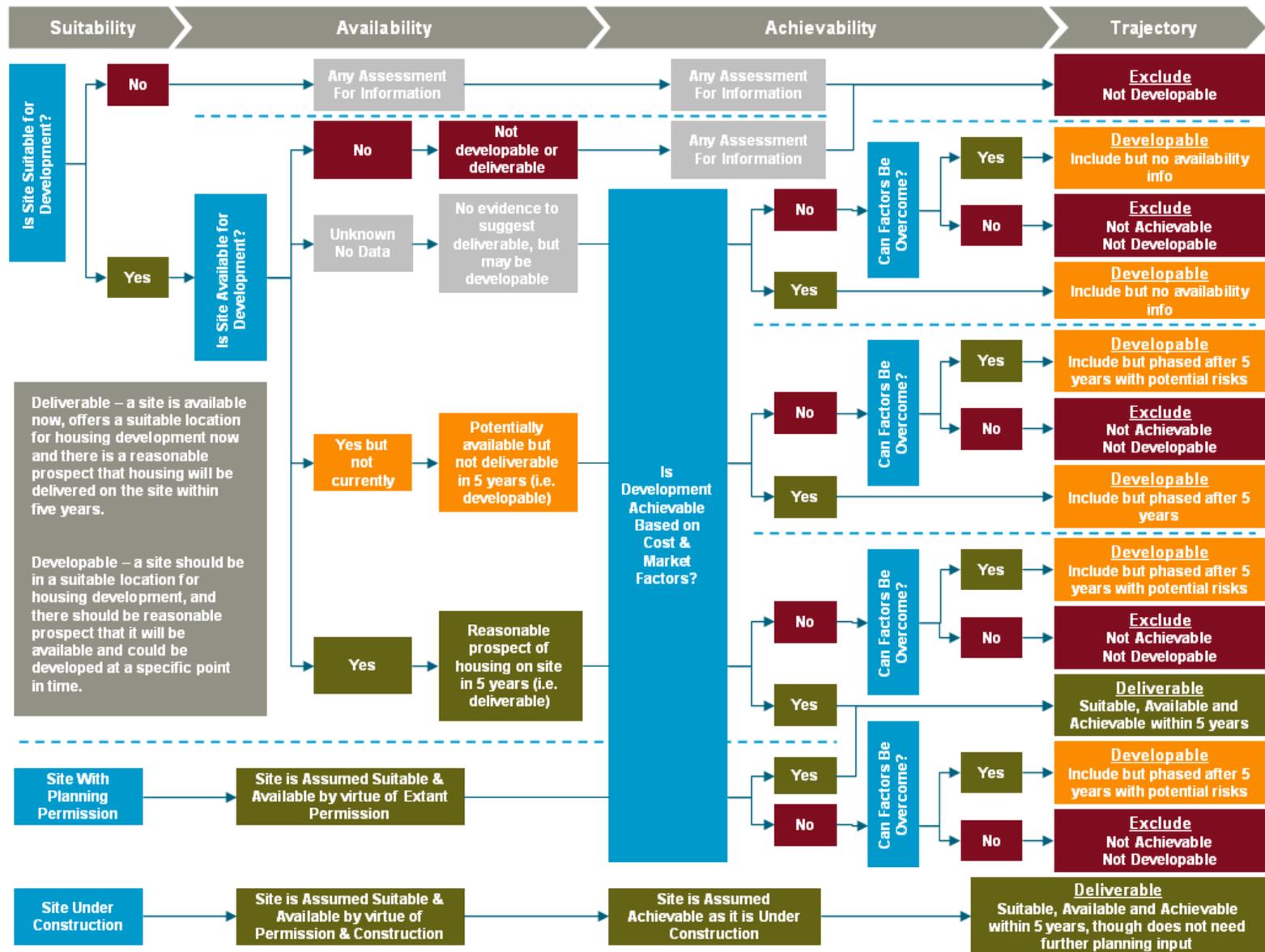


Fig 3 Stage 7 Decision Tree

- 4.11 The approach to the application of this decision tree at each stage is described in Sections 6.0 to 8.0.

Study Process

- 4.12 In summary, the process of undertaking the Stage 7 Study is set out below:
- a **Planning the Assessment:** develop and refine the methodology in consultation with the client group. Review the existing evidence and data collated for Stages 1-6;
 - b **Initial site sieving:** the GNDP undertook an initial sieving process whereby any sites initially identified were removed where the GNDP considered that there were overriding factors that meant sites were not appropriate for housing development. 515 sites were identified by the GNDP for consideration as part of Stage 7;
 - c **Agreement of evaluation matrix and methodology:** agree a set of appraisal criteria with the GNDP to assess the deliverability and developability of sites identified in the SHLAA, including how existing GNDP site suitability data will be applied;
 - d **Assessing Suitability for Housing:** subject the housing sites to an analysis of their 'suitability' for housing, i.e. whether they offer a suitable location for development and would contribute to the creation of sustainable, mixed communities, based on the scoring of site attributes by the GNDP;
 - e **Assessing Site Availability for Housing:** detail the planning history of the site; its ownership; and the extent to which it is being actively promoted for development. This helps indicate whether the site is likely to come forward for development within the allotted timeframe.
 - f **Assessing Site Achievability for Housing:** a judgement about the viability of a site for new housing over a certain period. This involves seeking commercial views from key bodies on matters of achievability as part of wider external stakeholder workshops, as well as the appraisal of key criteria concerning market, cost and delivery factors in the appraisal matrix;
 - g **Assessing whether and when sites are likely to be developed:** Drawing upon the preceding analysis, a judgement is made regarding whether the identified sites can be considered deliverable, developable or not currently developable for housing development. This includes providing an indication of likely phasing, identification of constraints and measures necessary to overcome them;
 - h **Review of the Assessment:** drawing together the results of the analysis, ascertaining the overall housing capacity of the sites and producing a trajectory that shows the level of development at different points of time in the future. In the event that this stage highlights an anticipated shortfall in future housing supply, advising on the need to identify additional sites or, alternatively, broad locations for development or windfall releases.

5.0 Parameters, Source Data and Database

Parameters

Study Area

- 5.1 The study area comprises the local authority areas of Norwich City, Broadland and South Norfolk. In total it extends to almost 1,500 sq km and occupies a large proportion of Norfolk. The area is home to 365,000 people living in 150,000 households. Section 3.0 provides further details on the study area and the characteristics of the housing market areas therein.

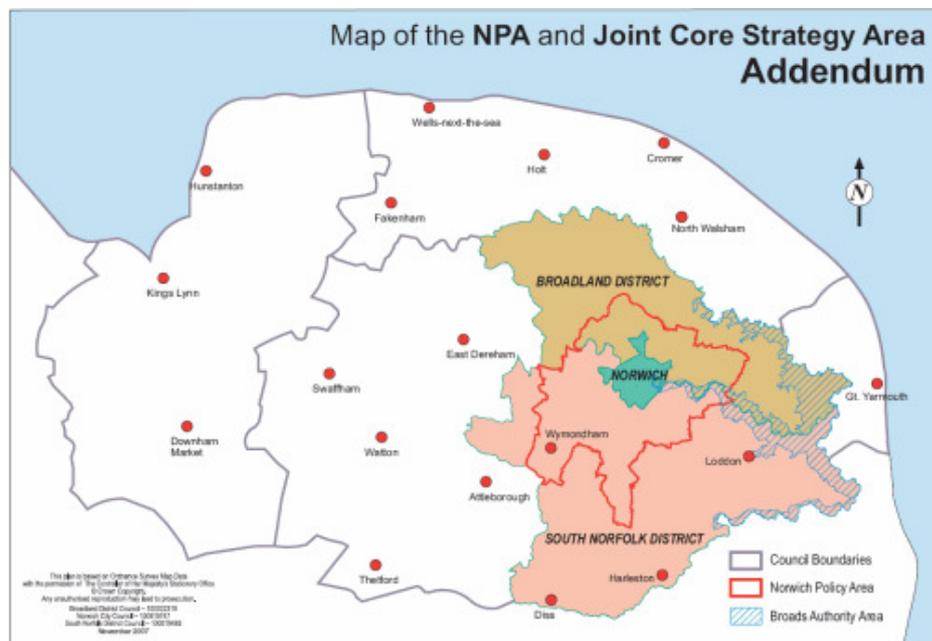


Fig 4 The Greater Norwich Area

Time Horizon

- 5.2 PPS3 requires Local Authorities to:

“...set out in Local Development Documents their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption” (Paragraph 53).

- 5.3 As described within the CLG SHLAA Practice Guidance document, the purpose of the assessment is to aim to identify sufficient specific sites for at least the first 10 years of a Plan from the date of adoption and ideally for the full 15 years. Furthermore, the Local Authority needs to identify a continuous 5 year supply of specific deliverable sites which are ready for development.

- 5.4 The Stage 7 Study therefore provides an indicative trajectory that classifies the SHLAA sites into five groups:
- a deliverable in the first 5 years;
 - b developable in years 6 to 10;
 - c developable in years 11 to 15;
 - d developable post 15 years;
 - e not developable at all.
- 5.5 To correspond to the Council's Annual Monitoring Report requirements, the Study's notional base date is considered to be 1st April 2008, which reflects the time period within which the majority of the primary data was collected. However, as this stage 7 assessment has been undertaken in early 2009, it considers planning permissions granted, ownership information and any updated primary data as at 1st April 2009. Whilst this report seeks to demonstrate the supply of deliverable and developable land as at 1st April 2009, each Local Authority will need to ensure that this is up to date for the preparation and adoption of its Site Allocations DPD.

Source Data

- 5.6 NLP were supplied with five databases, each of which contained site specific information relevant to the 481 sites initially appraised by the GNDP as part of Stages 2 to 6 of the SHLAA.
- 5.7 Stage 2 required the GNDP to identify which sites were to be considered under the SHLAA. Whilst the purpose of the Stage 7 study was not to identify any further sites by repeating this earlier process, it was considered important to compare the housing land monitoring reports of the GNDP Authorities with the SHLAA list of sites. This ensured that all housing sites currently in the planning system (i.e. allocated sites and those with planning permission) were assessed at Stage 7. The monitoring reports used were as follows:
- Broadland: Land Availability (at April 2008)
 - Norwich: Schedule of Residential Land (at April 2008)
 - South Norfolk: Residential Land Availability (at April 2008)
- 5.8 As a result of this exercise, a further 34 sites meeting the GNDP's site size thresholds as determined under Stage 4 of the SHLAA, were identified as having the potential to deliver housing.
- 5.9 Consequently, a total of 515 sites were included in this Stage 7 Study, comprising:
- Broadland District Council: 171 Sites;
 - Norwich City Council: 125 Sites;
 - South Norfolk Council: 219 Sites.

Site Database

Interim Database

- 5.10 The GNDP provided NLP with a SHLAA site database which included the following categories of information:
- a Basic site information, such as site reference, address, parish and brownfield/greenfield status;
 - b Site characteristics, including site area, planning status, main current use, previous uses and a site character summary;
 - c Policy restrictions, including access and safety, highway improvements needed and provision of utilities;
 - d Site conditions, including flood risk, hazards risk and site contamination;
 - e Accessibility, including proximity to facilities and bus services; and
 - f Conclusions/recommendations, including unconstrained capacity.
- 5.11 Prior to commissioning the study for Stage 7, the GNDP used its best endeavours to populate the databases with as full a range of information about sites as was practicable, taking account of the resource constraints on the constituent local authorities at a busy and critical stage of the LDF process. However, in some instances comprehensive site information could not be provided, the extent of missing information varying between the three local authorities and from category to category. Where such gaps existing in the data, NLP sought clarification from the GNDP; however, in the few instances where data gaps persisted, NLP has exercised its professional judgement, using available data sources to complete this missing information. This has either been verified by the GNDP or the assumption is noted in the final database.

Final Database

- 5.12 As part of the output requirement for the Stage 7 Study, NLP added additional sections of information to the GNDP database relating to the three phases of assessments undertaken (i.e. Suitability, Availability and Achievability). Other sections have also been included in the database; one that provides an overview to the assessment of each site, longer term monitoring, and the identification of constraints. The additional database categories have been prepared in such a way that the GNDP are able to maximise its functionality and potential rather than it being an additional data monitoring exercise which is only updated once a year. Its key features are:
- A valuable tool which can assemble all site information in one place. It is readily expandable, both in terms of the number of sites, and the inclusion of additional assessment criteria as is required by future national and local monitoring and assessment requirements;

- It clearly shows the suitability, availability and achievability scores given to each site. The suitability categories correspond directly back to the suitability assessment matrix agreed by the GNDP;
- Comments boxes are included to allow the GNDP to note any unique site characteristics or assumptions made which have resulted in a particular assessment score being given;
- Highlights where particular constraints would need to be overcome for a site to be deliverable/developable;
- The SHLAA suitability, availability and achievability assessments have been brought together under 3 databases, one for each of the local authorities;
- Comprehensive ownership details are included. Where this data is currently missing it can be added to at a later date; and
- Provided the database is kept up to date, the monitoring tab will allow each of the GNDP authorities to quickly and easily extract housing land supply data.

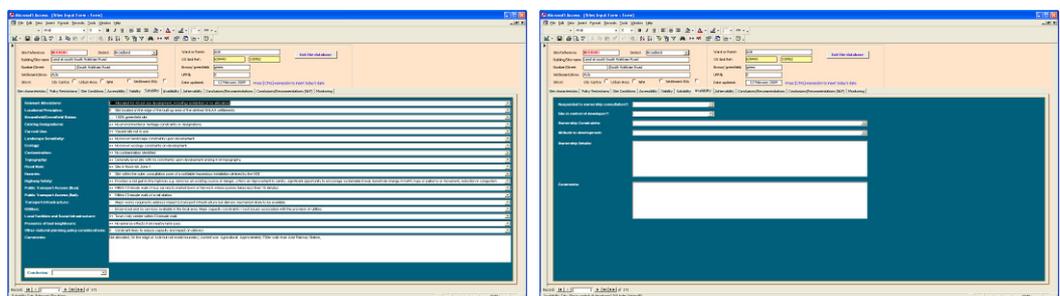


Fig 5 SHLAA Database

Consultation

- 5.13 The Stage 7 Study has included three separate consultation processes the purposes and outputs of which have been summarised in Table 4. Each consultation was undertaken in co-ordination with the GNDP.
- 5.14 The aim was to gather data relating to site availability, as well as an understanding of viability and deliverability issues in the Study area. The ownership questionnaire and stakeholder workshop consultations are both highlighted as good practice for the SHLAA. In terms of the suitability assessment consultation, there is no statutory requirement to consult on the assessments made and indeed this is not usual practice by Local Authorities. Nevertheless, it was considered that as a formal call for sites had not been undertaken by the GNDP, one round of consultations on the suitability assessments was a beneficial exercise to undertake.
- 5.15 The consultation events have provided NLP and the GNDP with an opportunity to ensure that the SHLAA is an effective document that will provide a robust foundation to their Local Development Frameworks.

Consultation Type	Date	Consultation Group	Purpose	Output
Ownership Questionnaires	23 January, 3 February, 12 February, and 30 March 2009	Known owners/agents of SHLAA sites, as advised by the GNDP	To understand whether there are any constraints to the availability or achievability to each of the SHLAA sites.	Where available, responses have been used to inform the availability and achievability assessments.
Workshop Event including round table discussions	26 January 2009	A range of stakeholders were invited including landowners, agents, utility suppliers and surveyors.	To understand the thoughts and experiences of those who have an intimate knowledge of viability and deliverability factors affecting housing delivery within the GNDP area.	Responses were analysed and have been used to inform the suitability, availability and achievability elements of the Study. A full report from the workshop event can be found at Appendix 2
Suitability Assessment Consultations	27 January and 8 April 2009	All Stakeholders invited to the workshop. The availability of these suitability assessments for consultation was also highlighted to all those sent ownership questionnaires.	For stakeholders to review our initial suitability assessments for each site and to provide comments where it was felt necessary. These comments were reviewed by both NLP and the GNDP.	Amendments to the suitability assessment scores were made as appropriate.

Table 4 Consultation Process

5.16

The following three sections look at the application of the suitability, achievability and availability tests to the identified sites. Each section summarises the general approach, sets out the headline results, and outlines some key characteristics/issues flowing from the assessments. More detail is included in individual Appendices.

6.0 Suitability

Introduction

6.1 Stage 7a of the SHLAA (as defined by CLG Guidance) requires that each site is assessed for its suitability to deliver housing. This task focuses on subjecting the potential housing sites to an analysis of whether or not it is ‘suitable’ for housing, i.e. whether it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities.

6.2 The purpose of this section is therefore to describe the process and outputs of the assessment of suitability. The outputs from this section include:

- Those sites considered suitable for housing (and carried forward for testing in terms of Availability and Achievability); and
- Those sites not considered suitable for housing.

Approach to Assessment

Initial site sieving

6.3 The sites included in the SHLAA have been drawn together by the GNDP from a wide range of sources as required by the CLG guidelines. The guidance does, however, recommend that particular types of land or areas be excluded, or sieved, from the assessment. As noted in the guidance,

‘except for more clear cut designations such as SSSIs, the scope of the assessment should not be narrowed down by existing policies designed to constrain development, so that the LPA is in the best position when it comes to decide its strategy for delivering its housing objectives.’

6.4 Through an analysis of GIS layers supplied by the GNDP, sites which have constraints which fall completely within any of the categories listed in Table 5, are considered unsuitable for housing. The purpose of this initial stage is to ensure that the sites identified by the initial stages of the SHLAA represent potentially appropriate locations for residential development in terms of their freedom from particular designations as defined by current planning/government legislation as being unsuitable for development.

<ul style="list-style-type: none"> • Ramsar Sites • Special Protection Areas (SPA) • Scheduled Ancient Monuments (SAM) • Registered/Unregistered Historic Parks and Gardens • Sites of Special Scientific Interest (SSSI) 	<ul style="list-style-type: none"> • Special Areas of Conservation (SAC) • Ancient Woodlands • Flood Risk Area Zone 3b • Health and Safety Executive inner COMAH zones • Norwich Airport public safety zone • National Nature Reserve
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Table 5 Constraints which render SHLAA sites unsuitable for housing

6.5 Care was taken to ensure that this initial analysis did not result in the exclusion of sites which, despite being partially constrained by one of these factors, do have the capacity to accommodate some sustainable residential growth.

6.6 As part of this initial site sieving exercise it was concluded that all sites with extant planning permission for residential development, or a resolution to grant, were considered suitable by virtue of the planning application process that they had been through.

Appraisal

6.7 An assessment matrix to review the suitability of each site for housing development was prepared in conjunction with the GNDP; the final matrix can be found in Appendix 3. Nineteen factors were considered important in determining whether a site should be considered as suitable and each site was given a score of double negative (- -), negative (-), zero (0), positive (+), or double positive (++) for each of these factors:

- | | |
|--------------------------------------------------------------------|--------------------------------------------------------------------|
| a) Relevant Allocations within existing Statutory Development Plan | j) Flood Risk |
| b) Locational principles for new housing development | k) Hazards |
| c) Brownfield / Greenfield Status | l) Highway Access and Safety |
| d) Existing Designations | m) Public Transport Access (bus) |
| e) Current Use | n) Public Transport Access (rail) |
| f) Landscape Sensitivity | o) Transport Infrastructure |
| g) Ecology | p) Utilities |
| h) Contamination | q) Local Facilities and Social Infrastructure |
| i) Topography | r) Presence of Bad Neighbours likely to affect residential amenity |
| | s) Other Material Planning Policy considerations |

6.8 CLG Guidance advises against the use of existing policy as a definitive constraint against the suitability of a site for housing. Where the assessment matrix has referred to factors which are directly or indirectly influenced by current local planning policy, these have been considered as one factor which has then been balanced with other suitability criteria in the overall assessment of the sites. Its score in the assessment reflects current policy and does not necessarily preclude a site from being considered as suitable, although it may instead influence its timescale for delivery.

Source of assessment data

6.9 The information used to assess each of the sites was derived from site visits and subsequent examination carried out by the GNDP as part of Stages 2-6 of the SHLAA. This was supplemented by comments received from landowners and developers regarding their own sites, NLP's own review of Local Plans and other publically available data sources such as the Environment Agency's Flood

Mapping data. Appendix 4 explains in detail the source of data for each assessment criterion.

- 6.10 The scope of the Stage 7 Study did not allow for a full test of accuracy of this source data. However, where it became clear from a review of online aerial photography or available planning policy documentation that there may have been error in the data provided, a query was sent to the GNDP to ascertain the correct information.

Inputs from Consultations

Stakeholder Workshop

- 6.11 The stakeholder workshop did not directly seek to gather views on the suitability criteria or on the assessment of individual sites. Nevertheless, a number of relevant opinions and perceptions relating to the suitability criteria were raised during the workshop session (see Appendix 2 for a more detailed analysis):
- a **Change of use:** Current planning policy within the GNDP authorities limits opportunities to develop housing on sites with other active uses and the assessment matrix for suitability reflects this policy position.
 - b **Greenfield Land:** Continued political resistance to building on greenfield sites despite PPS3's recommendations.
 - c **Long term allocations:** Long term housing allocations are routinely carried over from previous plan periods. The perception of some stakeholders was that the historic identification of specific sites (which might never be developed) was being used more as a political tool to limit housing growth than as a genuine attempt to deliver housing.
 - d **Infrastructure:** Norfolk County Council has made assessments on highway access, safety and the need to provide transport infrastructure contributions and these have been taken into account as part of the suitability assessments. The delivery of infrastructure would positively alter the scores given for a number of sites and therefore the suitability of these sites is directly affected by the ability of the Local Authorities to deliver schemes.

Whilst these are issues that are relevant to consider, in general the suitability assessment has not sought to identify sites as being unsuitable on the basis of any single one of these criteria, however, it does imply a relative ranking of sites based on such criteria. These issues relate more to policy decisions for the GNDP authorities rather than the absolute suitability of a site for housing development.

Suitability Assessment Consultation

- 6.12 The suitability assessment consultation resulted in a reasonable level response from stakeholders. The site-specific matters raised through the consultation

were considered by both NLP and the GNDP and have been incorporated into the suitability assessments where appropriate. In addition to the site specific responses received three general points were raised:

- a **Agriculture as an active use:** Initially the suitability assessments regarded agricultural activity on a site as an active use. Following the consultation, the relative issues of developing active agricultural land compared with, for example, active employment land, lead to the scores of agricultural sites being reclassified as not having an active use.
- b **Developer Studies:** Concerns were raised by consultees over the GNDP's initial assessments, particularly in relation to highway matters. A number of developers objected to negative scorings, particularly where they had previously submitted contrary evidence to the GNDP. Having reviewed the comments made, the GNDP considered amendments to the scores were not appropriate as these scorings were derived from the consistent and objective application of an agreed methodology and, in the case of some highway and accessibility scores, the use of industry standard Accession software.
- c **Site boundaries:** It was highlighted that as a consequence of the way the sites have been delineated for the SHLAA, many of the sites score poorly in some of the suitability criteria, for example, highway safety and locational principles. In some cases the intention on the part of the developers is to develop a number of sites as a comprehensive scheme which would eliminate these suitability concerns.

Core Outputs

6.13

Stage 7a of the CLG guidance requires an assessment of suitability of the potential housing sites. Appendix 5 provides the full suitability scoring summary for each site assessed. Table 6 summarises the number and capacity of suitable and unsuitable sites across the GNDP area and by each of the three Local Authorities. From the 515 sites included within the SHLAA, a total of 33 sites are considered unsuitable for housing development.

Local Authority	Sites Assessed		Suitable Sites		Unsuitable Sites	
	Number of Sites	Yield	Number of Sites	Yield	Number of Sites	Yield
Norwich City	125	9,697	117	9,664	8	33
Broadland	171	86,421	157	80,696	14	5,725
South Norfolk	219	80,832	208	72,304	11	8,528
Total	515	176,950	482	162,664	33	14,286

Table 6 Summary of Suitability Assessment

- 6.14 The Stage 7 Study identified 3 suitability criteria whereby if a site scored a double negative it would be considered unsuitable and would no longer be analysed for availability for achievability. These factors were:
- a Existing Designations (In or adjacent to an internationally or nationally significant designation – SSSI, AONB, outside the defined development boundaries of the Norfolk Broads, Grade 1 Listed Building, Scheduled Ancient Monument);
 - b Flooding (Site in flood risk Zone 3b); and/or
 - c Ecology (Highly sensitive ecology on site representing a major constraint on development).
- 6.15 Consideration was also given to whether the following issues on site meant that sites were unsuitable for housing development:
- a Landscape sensitivity (Highly sensitive landscape area which would represent a major constraint on development e.g. entirely within a Historic Park/Garden or other designation as identified in Table 5);
 - b Current use as a constraint on capacity (e.g. recently completed housing schemes or development for other uses that would render the site unsuitable/unable to accommodate residential)
- 6.16 Whilst CLG guidance advises against using existing local policy restrictions to conclude against a particular site, it is considered that for some landscape designations it is unlikely that the constraints on site will significantly change to the extent that the GNDP would consider housing development appropriate. Therefore, sites wholly within a landscape designation which will represent a major constraint on development, but are unlikely to be altered by policy decisions, such as Historic Parks, are considered unsuitable.
- 6.17 In addition sites that were identified as being recently completed for housing development, with no residual capacity for new dwellings were also considered unsuitable by virtue of their current use. An unconstrained capacity of zero was identified for these sites. A list of unsuitable sites is contained in Appendix 12.
- 6.18 For the purpose of this Stage 7 study only absolute suitability is considered (i.e. a site is suitable or is not suitable), though it is acknowledged that the GNDP may wish to make relative suitability assessments which may flow from consideration of current or future policy, through the LDF process.
- 6.19 The summary table indicates that Norwich has fewer unsuitable sites compared with Broadland and South Norfolk. This generally reflects the urban nature of Norwich City and its fewer landscape and ecological constraints.
- 6.20 The suitability summary table shows that, based upon the criteria considered under the assessment matrix and the information provided by the GNDP, the significant majority of sites could be considered suitable for the delivery of

housing. For any of these suitable sites, some or a number of mitigation measures may need to be used to ensure that no adverse impacts arise from any development. The level and nature of these mitigation measures would depend on the individual site and the nature of the proposed development. Where it is likely that significant improvement works are required (such as for utilities or highway infrastructure), these have been reviewed further as part of the achievability section of the Stage 7 Study.

6.21 NLP’s suitability assessment is based only on the data available from the GNDDP at a particular point in time, using a common assessment methodology. Not all of the sites will necessarily perform equally in terms of suitability and in the event that a location emerges from stage 7 with a greater supply of potentially deliverable and developable sites than is required by the RSS, there may be the opportunity to rule sites in or out of the planning strategy based on the Core Strategy, other principles (e.g. around the strategic focus for growth in the district) and/or on relative performance against the suitability criteria. This is a matter outside the scope of the study, although the scoring against criteria provides an assessment of comparative individual site performance to support those relative judgements.

6.22 Fig 6 identifies the relative performance against suitability criteria of sites based on average score where double negative (- -) scores 1 through to a double positive (++) scores 5. The scores for each criterion are un-weighted relative to each other. The figure also shows the unconstrained dwelling capacities of the sites for each grouping of suitability scores.

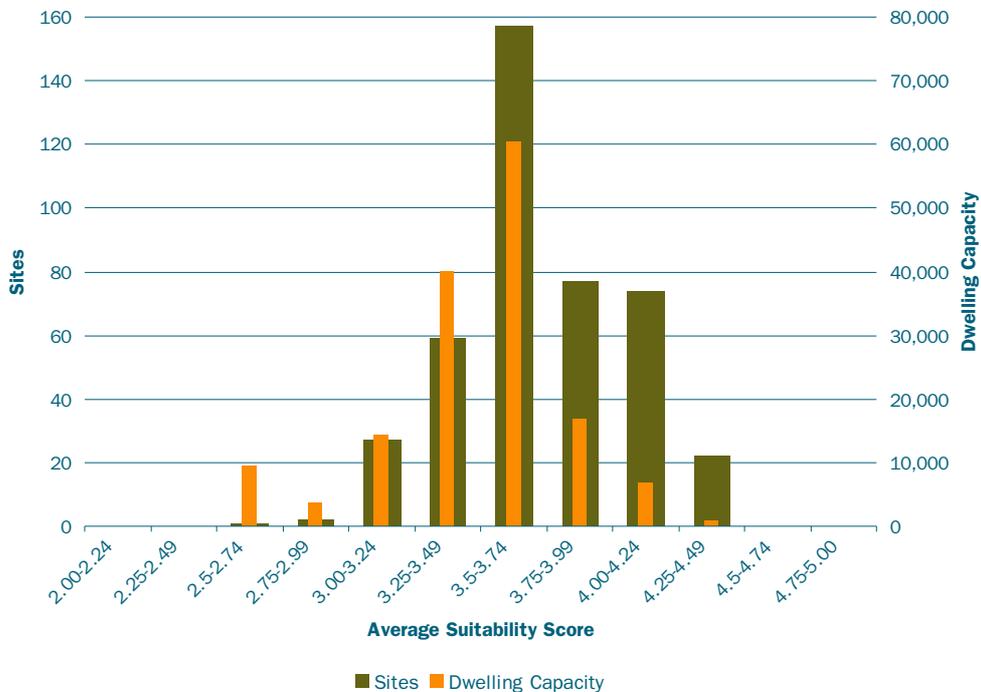


Fig 6 Average Suitability Score of Sites Assessed

6.23

This shows that the distribution of relative suitability is fairly wide, although the majority of sites score an average of between 3.5 and 4.24, which would translate to approximately positive (+), which is a score of 4, on the suitability matrix scoring. A small number of sites have an overall suitability score that is significantly lower than the majority of sites. This figure also shows that the larger sites appear to score worse on the suitability assessment, with the sites that are scoring relatively poorly having high site capacities, in comparison with those scoring well. This is a reflection of the generally greater number of constraints faced by large sites and also that large sites are likely to be greenfield development, potentially without current infrastructure provision and further away from existing services.

7.0 Availability

7.1 The purpose of this section is to describe the process and outputs of the assessment of achievability (Stage 7b of the SHLAA methodology).

7.2 The outputs from this section are:

- Those sites considered to be available for housing on site in 5 years (i.e. potentially deliverable)
- Those sites considered to be potentially available but not deliverable in 5 years (i.e. potentially developable)
- Those sites not considered to be available

Approach to Assessment

Source of sites

7.3 Stage 7b of the CLG guidance is the assessment of site availability for housing, with paragraph 39 advising that:

“A site is considered available for development, when on the best information available, there is confidence that there are no legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners...”

7.4 Legal searches can provide the “*best information*” on ownership but that these can only be relied upon for a short period. Many SHLAAs do not rely upon legal searches, with a preference towards the onus being placed upon the relevant landowners or controlling interests to provide information on matters of availability. NLP considered that this is the most appropriate means of establishing the necessary information.

7.5 The GNDP supplied either owner or agent contact details for sites where they were aware of an acting party. In addition alternative sources of such information, such as planning application forms and certificate details from recently submitted planning applications, were used to further populate a database of contact details for each site.

Source of assessment data

7.6 For each of the sites which had passed the suitability assessment or have either planning permission, are under construction, or currently have a planning application being determined, a letter and questionnaire was sent to the owner or agent, a copy of which can be found in Appendix 6. This asked the owner/agent a series of questions which provided an indication of whether the site was available for housing development, likely to come forward and if so, in what timescale.

- 7.7 In assessing ownership factors, the matrix allowed for a judgement of how it could affect the site from being delivered:
- Multiple ownerships can cause difficulties where some owners are unwilling to release land for development. Alternatively there may be possible ransom strip issues;
 - Site in multiple ownership but issues can be resolved;
 - Minor ownership issues that can be overcome;
 - Site in single ownership but not being actively promoted for development at this time; or
 - Site in single ownership and being actively promoted for development.
- 7.8 Understanding site ownership issues is essential to underpinning the likelihood that a site will be available and deliverable for residential development and as such the assessment has sought to score the availability of sites by assessing ownership factors and, where identified, the attitudes of owners towards residential development.
- 7.9 Having collated ownership information received from the consultation exercise a review of sites was undertaken to score these based on the current ownership and attitudes towards development. This information was identified from questionnaires sent out to landowners and agents where those contact details had been identified and also from 'call for sites' forms from the Local Authorities' Site Allocations DPDs, where provided.
- 7.10 The available information for site ownership and landowners intentions for development is not comprehensive and whilst details have come forward for sites that landowners or agents are actively promoting through the LDF process, for the majority of sites ownership information is unavailable. As identified in CLG guidance the availability of sites should be based on best information, with sites considered available where land is owned by a housing developer who has expressed an intention to develop, or the landowner has expressed an intention to sell. This means that there is a requirement for evidence to identify a site as available (i.e. evidence is needed to rule a site in), as opposed to the assumption that a site is available until evidence is identified that excludes its availability. In consideration of this, where no information has come forward on the availability of a site, the ownership and any legal issues NLP has assumed that the site is not immediately available for development and therefore cannot come forward in the first five years (i.e. is not deliverable). Of course, it is possible that new site information may become available that was not supplied to the Stage 7 process, which allows a conclusion to be drawn that the site is likely to come forward. The implication of the evidential requirements is that, in NLP's view, there will be sites that are available but where the evidence is not produced to justify this conclusion for the purposes of this study.

- 7.11 Due to the unavailability of ownership information for many of the sites we recommend that if the Local Authorities are looking to promote any of these sites through the Local Development Documents that further consultation work is undertaken to underpin the availability of the site, as required by PPS3.
- 7.12 Where information has been obtained, the site ownership and attitudes to development can have a bearing on when the site is likely to become available for development:
- a Where landowners or agents have come forward with information regarding land ownership, the review of availability has assumed that if they have indicated a site is in single ownership and available immediately then the assessment is taken as indicated and the site is available immediately i.e. within the first 5 years.
 - b Where landowners or agents have come forward and have identified that there are some issues with ownership (e.g. tenancy holdings without exercisable break clauses) it has been assumed that the site is not immediately available, but will be available subject to ownership issues. This is scored accordingly on the ownership criteria.
 - c Where landowners or agents have come forward and have specifically indicated that their aspirations for development are not within the first 5 years (e.g. due to continued existing use of the site) it has also been assumed that the site is not immediately available, but will be available subject to the identified phasing preference. This is scored accordingly on the attitude to development criteria.
 - d Where information from landowners or agents, either through the consultation process or Local Authorities' 'call for sites' exercise, indicates that the site is not available for housing development, the site cannot be deemed deliverable.
 - e Where information has been collated from the Local Authorities 'call for sites' exercise it gives an indication of the site promoter's attitude to development but not necessarily about ownership issues. Sites that have been promoted through this mechanism but for which specific ownership information has not been identified have been put in the second 5 year development tranche as information is not available on the immediate availability of the site.
- 7.13 This approach to the likely impacts that ownership and attitudes to development will ensure that all sites identified as available immediately for the first 5 year tranche of development are fully evidenced.

Stakeholder Workshop Consultation

- 7.14 The workshop event was not directly aimed at understanding the availability of sites within the GNDP area. However, indirectly through other discussions an important point was raised regarding **Land-banking**: Many of the discussion groups raised an issue related to the recent reduction in land values, in that

given the current economic climate, landowners are holding onto their land rather than seeking to develop it for housing. This is likely to be more of an issue for the shorter term rather than affecting the whole Plan period until land values stabilise, although in the shorter term it could mean that there are fewer deliverable sites in the GNDP area.

Core Outputs

Availability

7.15 Of the 515 sites ownership or agent contact details were identified for 325 sites, with some sites identified as having more than one controlling interest. Each of these identified parties was sent a letter and questionnaire and 197 responses covering 190 sites were completed and returned.

Local Authority	No. Of Sites	Questionnaires Sent		Completed Responses		Response Rate (%)	
		Sites	Interests	Sites	Interests	Sites	Interests
Norwich City	125	56	57	23	24	31.1	42.1
Broadland	171	116	121	70	75	60.3	62.0
South Norfolk	219	153	154	97	98	63.4	63.6
Total	515	325	332	190	197	58.5	59.3

Table 7 Site Availability Questionnaire Response Rate

7.16 Using the information contained within the questionnaire responses, the sites were scored based on two criteria; site ownership and attitude to development. In assessing ownership factors, the matrix allowed for a judgement of how ownership could affect the site from being delivered with the following weightings:

- Multiple ownerships can cause difficulties where some owners are unwilling to release land for development. Alternatively there may be possible ransom strip issues (- - score);
- Site in multiple ownership but issues can be resolved (- score);
- Minor ownership issues that can be overcome (o score);
- Site in single ownership but not being actively promoted for development at this time (+ score); or
- Site in single ownership and being actively promoted for development (++ score).

7.17 To complement this, attitudes towards development were scored to give weight to owners' aspirations for sites and the impact that this would have on the availability of the site for housing development. This broadly fell into three categories:

- Site is not currently being promoted for development, owner is actively discouraging development or owner is seeking development other than for housing (- - score);
- Site is being promoted for development in the future, but is not available currently. Including where the owner has existing interests such as running an ongoing business from the site which will need to be relocated prior to development (o score); or
- Site is being unreservedly promoted for development (++ score).

7.18

Looking at both of these aspects gives a broader picture as to the availability of sites and the impacts that ownership and development attitudes will have on when sites will become available for housing development. These scores have been taken into account in identifying which 5 year tranche the site is likely to become available for development within. Table 8 below provides an overview of the identified availability of sites, with full assessments for each site with a response contained in Appendix 7.

Local Authority	Status of Sites from previous stage	Sites Assessed (Total)		Sites Available within 5 years		Sites Available but beyond 5 years		Sites Not available		No evidence	
		Number	Yield	Number	Yield	Number	Yield	Number	Yield	Number	Yield
Norwich City	Suitable	117	9,664	14	1,864	3	415	5	511	95	6,874
	Unsuitable	8	33	0	0	0	0	1	0	7	33
Broadland	Suitable	157	80,696	54	38,273	12	9,803	2	820	89	31,800
	Unsuitable	14	5,725	1	0	0	0	1	136	12	5,589
South Norfolk	Suitable	208	72,304	86	28,036	6	16,771	1	261	115	27,236
	Unsuitable	11	8,528	3	646	1	7,519	0	0	7	363
Total	Suitable	482	162,664	154	68,173	21	26,989	8	1,592	299	65,910
	Unsuitable	33	14,286	4	646	1	7,519	2	136	26	5,985

Table 8 Summary of Availability Assessment Responses

7.19

Site ownership information and attitudes for development were identified for the 190 sites, 8 of which had already been filtered out as being unsuitable. The majority of these were identified as not having any ownership issues (i.e. being in single ownership or having an option which infers single ownership) and being available immediately either for development or for sale to a developer.

- 7.20 A small number were assessed as having ownership issues that could be overcome, including sites in multiple ownership where site assembly will be required and sites that have incumbent tenants where the provisions of the lease agreements need to be considered to ensure the site is available for development. A very small number of sites were identified by the owner or agent as available for development but not until a specific point in the future.
- 7.21 Only nine sites were identified as unavailable through this review of ownership information, including several where the owner/developer is promoting development other than housing.
- 7.22 In addition to the ownership issues that have been identified, of the 118 sites in South Norfolk for which site ownership is unknown 33 of these sites are identified as still being actively promoted through the 'call for sites' associated with South Norfolk District Council's Site Allocations DPD. These sites continue to be put forward for development, but it is unknown if there are ownership implications and therefore it is assumed these will not be available for the first 5 year tranche as per other sites where there is no evidence.
- 7.23 As well as these sites the responses to the call for sites in South Norfolk identified two landowners who do not wish to continue promotion of their holdings for development. Both of these holdings represent small parts of wider sites (SNC0177 and SNC0210) which are unlikely to cause ransom strip issues, although the site boundaries of these sites should be altered to reflect these stances. In the case of these sites the review assumes they are available (as identified through the consultation) as small parts not being promoted for development are unlikely to prevent a scheme being implemented on the rest of the site. Consideration will be required as to site boundary amendments for these, and any other sites where such issues may occur, to reflect the call for sites information.
- 7.24 Overall, the majority of sites for which availability information has been identified are currently available. This may not reflect the pattern of sites overall as it is likely that the majority of landowners who have engaged with the SHLAA process, and thus have identified the availability issues, have done so as they are actively pursuing potential development and are promoting their sites through this process. Other sites where availability has not been established should be reviewed prior to inclusion in any DPD.

Sites with a relevant planning history

- 7.25 In addition to sites where the ownership details have been identified, there are a number of sites which have a relevant planning history which suggest that they available for development, but that no explicit response on the availability has been received. These relate to sites with the following status:
- **Under construction** – sites under construction but not yet complete still have the potential to deliver housing completions. These sites are

assumed to be available by virtue of their current status, being under construction. Site capacities are based on the uncompleted number of dwellings for which there is planning permission (i.e. the number of dwellings remaining to be built out).

- **Extant planning permission** – sites with an extant planning permission or outline planning permission for housing are also assumed to have no overriding availability factors and are therefore considered available. This is based on the reasonable assumption that the applicant believed there was a reasonable prospect that the site would be available for development within the period of the planning permission.
- **Sites with a resolution to grant planning permission** – sites with a resolution to grant outline or full planning permission are similarly assumed available to those with planning permission, although consideration needs to be given to potential reasons why planning permission has not yet been granted as to how likely the site is to come forward for development within 5 years.

7.26

Table 9 below provides a summary breakdown of sites that have a relevant planning history. These sites have been positively weighted in the assessment of availability as it is considered these are sites that are most likely to be available and come forward for development. To enable us to make these judgements a review of the current status of sites with planning permission was undertaken (See Appendix 11).

Local Authority	Status of Sites from previous stage	Sites Assessed (Total)		Sites Under Construction		Sites with Planning Permission		Sites with A Resolution to Grant Planning Permission		Sites With No Current Factors	
		Number	Yield	Number	Yield	Number	Yield	Number	Yield	Number	Yield
Norwich City	Suitable	117	9,664	5	333	24	1,573	8	1,834	80	5,924
	Unsuitable	8	33	0	0	0	0	0	0	8	33
Broadland	Suitable	157	80,696	2	520	3	1,508	2	1,233	150	77,435
	Unsuitable	14	5,725	0	0	0	0	0	0	14	5,725
South Norfolk	Suitable	208	72,304	13	2,593	6	428	0	0	189	69,283
	Unsuitable	11	8,528	0	0	0	0	0	0	11	8,528
Total	Suitable	482	162,664	20	3,446	33	3,509	10	3,067	419	152,642
	Unsuitable	33	14,286	0	0	0	0	0	0	33	14,286

Table 9 Summary of sites with a relevant planning history

8.0 Achievability and Overcoming Constraints

Introduction

8.1 The purpose of this section is to describe the process and outputs of the assessment of achievability of sites for housing, and the identification of, and action need to overcome, constraints to development (Stages 7c and 7d of the SHLAA methodology).

8.2 Paragraph 40 of the CLG guidance stipulates that a site is considered achievable for development where there is a '*reasonable prospect*' that housing will be developed on the site at a particular point in time. This is essentially a judgement about the viability of a site and the ability of the developer to complete and sell the housing over a certain period. It will be affected by:

- **Market factors** (i.e. adjacent uses and economic viability of existing, proposed and alternative uses);
- **Cost factors** (i.e. site preparation costs, physical constraints, prospect of funding etc); and
- **Delivery factors** (i.e. the developer's own phasing and realistic build out rates).

8.3 Paragraph 42 of the CLG guidance also states that where constraints have been identified, the Assessment should consider what action would be needed to overcome them. Actions could include the need for investment in new infrastructure, dealing with fragmented land ownership, environmental improvement or a need to amend planning policy which is currently constraining housing development.

8.4 Consequently, the outputs from this section include the following:

- Those sites considered achievable based on cost, market and delivery factors;
- Those sites not considered achievable for housing (i.e. where there is no reasonable prospect of a site coming forward at a particular point in time).
- The identification of constraints and potential mitigation measures.

Approach to Assessment

8.5 In recent years, viability has not been a significant barrier to housing delivery in the GNDP area. However, following the worsening economic climate and the fall in the housing market nationally, certain sites, particularly those in more marginal locations with exceptional site preparation costs, are less likely to be deliverable and developable in the short to medium term.

- 8.6 Consequently, depending on the extent and severity of the current market downturn, matters of viability and the market are a key element of the deliverability of sites.
- 8.7 The methodology used to assess the achievability of sites has involved a pragmatic and justifiable approach involving the collation of quantifiable data on market and cost factors. This has been combined with commercial views from key bodies as part of wider external stakeholder workshops that included representatives of local house builders / developers; commercial agents; utilities companies; the Highways Agency; Council Officers and other relevant stakeholders. The response of the workshop attendees is presented below.

Appraisal Criteria

- 8.8 The achievability assessment appraised all those sites judged as being 'suitable' and 'available' for housing development. Given the current economic downturn and the likely implications on viability, all sites that had outstanding planning permission for housing were reappraised. All housing sites where construction had already begun as of 1 April 2009 were excluded from the achievability analysis. This resulted in 462 sites being reviewed.
- 8.9 In summary, NLP's approach to ascertaining achievability of housing on the sites involved the inclusion of the following criteria in the matrix:

Delivery Factors:

- **Number of years to build:** following discussions at the stakeholder workshop (and where details of the developer's own phasing is unavailable), it has been assumed that 50 dwellings would take 1 developer 1 year to build, with larger sites having more than 1 developer involved simultaneously in the following manner:
 - A site of *less than 250 dwellings* would take 1 developer 1 year to build each 50 dwellings i.e. 100 dwellings would take 2 years, 249 dwellings would take 5 years;
 - A site of *between 250 and 499 dwellings* 2 developers 1 year to build each 100 dwellings i.e. 251 dwellings would take 3 years, 499 dwellings would take 5 years; and
 - A site of *500 dwellings or more* would take 3 or more developers 1 year to build each 150 dwellings i.e. 500 dwellings would take 4 years, 750 dwellings would take 5 years.
- **Planning factors:** Where a site is allocated for housing or has planning permission for housing, the site is rated '++' irrespective of the approved or allocated mix of uses and the residential proportion. Where a site has an allocation for an alternative, non-residential use, the site is rated '-'. All other planning factors are rated 'o'. This scoring helps to give an indication of the likelihood of delivery of housing on the site in terms of its current planning factors, notwithstanding that the site may be better suited for other alternative uses.

Market Factors:

- **Location and surroundings:** An adjusted score based on an amalgamation of the public transport services (both bus and rail); proximity to neighbourhood facilities; and presence of bad neighbour uses criteria from the suitability assessment.
- **Attractiveness of the locality as a residential location:** A judgement was made on the operation of housing markets in the Greater Norwich area using a combination of the results of the Greater Norwich Housing Market Assessment (September 2007) and the views of commercial agents / developers ascertained from the workshop event. A breakdown of the scoring, by housing market area, is presented in Appendix 8.

Cost Factors:

- **Site preparation costs:** higher values were given to sites that required little or no land remediation, based on the findings of the suitability assessment.
- **Exceptional highways costs:** lower values were generally applied to sites where major works required to address impacts to transport infrastructure, as identified by the County Council's highways officers as part of the suitability assessment.
- **Strategic utilities constraints:** based on the findings of the Greater Norwich Water Cycle Study (November 2007), which analysed potential constraints including flood risk and hydrology; water resources and supply; wastewater drainage and treatment; and the environment. Scoring for each GNDP settlement is provided in Appendix 9.

Stakeholder Workshop Consultation

- 8.10 The aim of the Stakeholder Workshop was to understand the factors that are influencing the ability to develop housing in the GNDP area. The two round table sessions at the workshop focused on discussing the viability of housing development; this feedback has provided further insight into the range of issues which will influence whether a site is considered to be deliverable, developable or not developable.
- 8.11 The stakeholders highlighted a number of perceived difficulties which are affecting the viability and deliverability of housing sites (see Appendix 2 for a more detailed analysis). These can be summarised as:
- a **The Planning System:** Lengthy Statutory Development Plan preparation and expensive planning application process without any certainty of outcome;
 - b **Politics:** A perceived lack of long term vision and an apparent political suppression of the number of houses allowed to be built through planning processes;
 - c **Infrastructure Provision:** An uncoordinated approach from infrastructure providers and unavailability of upfront funding from government agencies;

- d **Planning Obligations:** Unpredictability of S106 requirements along with a reluctance amongst Councils generally to accept phasing of contributions;
- e **Land Value:** Continued perception of landowners of high values despite the downturn and the fluctuations of the value of brownfield sites in comparison with less volatile greenfield values;
- f **Housing Product:** The high density housing being pushed by national and local government is not the product that is being sought by the market;
- g **Delivery:** Historic delivery rates across the GNDP area have not met past targets; therefore, it is questionable whether the levels required by the RSS can be achieved under current market conditions.

8.12 Stakeholders generally considered that, in the short-term, greenfield sites on the edges of the key service centres will be most attractive for developers. In addition to this, smaller sites (less than 0.5 ha) with more manageable Section 106 requirements pose the least risk to developers and will therefore be amongst the first to be delivered. Conversely, brownfield sites within Norwich City Centre are likely to have the higher costs (such as remediation works), and the requirement for the developer to bring sites forward at higher densities will not be deliverable at this time.

Core Outputs

8.13 Table 10 presents a summary of the results of the achievability assessment. A full breakdown of the results using the criteria outlined above is presented in Appendix 7. On the basis of the results emerging from the criteria assessed, a judgement was made on the achievability of each site coming forward for development in the following manner:

Site considered achievable if:

- The site is under construction, or has outstanding residential planning permission/resolution to grant, with a low apartment component; or
- It has positive ownership characteristics with no more than one negative cost/market factors that can be overcome; or
- Ownership characteristics are at worst unknown, with no more than one negative cost/market factors that can be overcome.

Site not considered achievable unless cost/market factors can be overcome if:

- The site has outstanding residential planning permission/resolution to grant, but with a high apartment component or an identified delaying factor; or
- Ownership characteristics are at worst unknown, but with two negative cost/market factors that can be overcome.

Site not considered achievable if:

- Ownership characteristics are at worst unknown, but with three negative cost/market factors;
- A negative response was received regarding the owner's intentions for the site, hence the site is unlikely to come forward for development; or

- Site not considered suitable for development following suitability appraisal.

Local Authority	Status of Sites from previous stage	Sites Assessed		Currently Achievable		Not Currently Achievable			
						Cost/Market Factors can be overcome		Cost/Market Factors cannot be overcome	
		No.	Yield	No.	Yield	No.	Yield	No.	Yield
Norwich City	Under Constr. or with PP or with a resolution to grant	37	3,740	18	2,187	19	1,553	0	0
	Available within 5 years	6	1,140	6	1,140	0	0	0	0
	Available but beyond 5 years	3	415	3	415	0	0	0	0
	Suitable but Unknown Availability	66	3,858	54	2,282	12	1,576	0	0
	Unsuitable + unavailable*	13	544	n/a	n/a	n/a	n/a	n/a	n/a
Broadland	Under Constr. or with PP or with a resolution to grant	7	3,261	6	3,242	1	19	0	0
	Available within 5 years	51	37,024	42	23,512	9	13,512	0	0
	Available but beyond 5 years	12	9,803	4	1,573	8	8,230	0	0
	Suitable but Unknown Availability	85	29,788	67	26,281	15	2,828	3	679
	Unsuitable + unavailable*	16	6,545	n/a	n/a	n/a	n/a	n/a	n/a
South Norfolk	Under Constr. or with PP or with a resolution to grant	19	3,021	19	3,021	0	0	0	0
	Available within 5 years	84	27,929	55	17,905	26	9,123	3	901
	Available but beyond 5 years	6	16,771	4	7,098	1	98	1	9,575
	Suitable but Unknown Availability	98	24,322	73	16,972	18	6,183	7	1,167
	Unsuitable + unavailable*	12	8,789	n/a	n/a	n/a	n/a	n/a	n/a
Total	Under Constr. or with PP or with a resolution to grant	63	10,022	43	8,450	20	1,572	0	0
	Available within 5 years	141	66,093	103	42,557	35	22,635	3	901
	Available but beyond 5 years	21	26,989	11	9,086	9	8,328	1	9,575
	Suitable but Unknown Availability	249	57,968	194	45,535	45	10,587	10	1,846
	Unsuitable + unavailable*	41	15,878	n/a	n/a	n/a	n/a	n/a	n/a

Table 10 Summary of Achievability Assessment

* Sites considered to be unsuitable or unavailable following the earlier analysis have not been subjected to the achievability tests.

8.14

In summary:

- 351 sites, comprising 105,628 dwellings, are considered currently achievable, with a further 109 sites (and 43,122 dwellings) considered achievable if cost/market conditions are overcome. The majority of these sites (76%) and particularly dwellings (94%) are located in South Norfolk and Broadland Districts (the latter statistic illustrates the point that sites in the more rural Districts tend to be considerably larger than those in Norwich City).
- Of the 63 sites under construction, with planning permission for residential uses or with a resolution to grant, 43 sites are considered achievable, equating to 8,450 dwellings. The remaining 20 sites are considered achievable if cost / market factors can be overcome. Many of these sites are located in Norwich City, and predominantly comprise high density dwellings, specifically apartments.
- Of the 141 sites considered to be available within the next five years, the vast majority are considered achievable (73%), or achievable if market / cost factors can be overcome. Just 3 of these sites, located in South Norfolk, are not considered to be achievable.
- Just 21 sites are considered to be available beyond the 5-year timeframe, predominantly located in Broadland. All but one of these sites are considered to be achievable.
- Of the 249 sites that are suitable but have unknown availability considerations, 10 have cost/market factors that are unlikely to be overcome, whilst a further 45 sites could be achievable if the market and cost viability were to improve.

Overcoming Constraints

8.15

In a number of instances, specific constraints to development, either on a site-specific basis or on a more strategic, cumulative, level, have been identified which could preclude development in the short-medium term. In order to overcome some of the policy constraints, we have made the assumption that the GNDP will be able to make policy choices through the LDF process to allow sites to come forward.

8.16

At a strategic level, the consultation process indicated two key areas where comprehensive, long term, investment may be required to overcome constraints and to enable housing development to come forward:

Highways Safety and Transport Infrastructure:

8.17

Consultation with the Highways Agency regarding the trunk road network in the GNDP area has resulted in a number of concerns being raised regarding the cumulative impact of many of the proposed housing sites on the A47 and the A11 in particular. The Agency are keen to avoid a situation whereby a number of housing sites are brought forward that are likely to have a cumulative impact on the trunk road network. Whilst comments from Norfolk County Council Highways Officers on individual sites have been factored into the site appraisal forms, particular issues of concern involve the following areas:

- **A11 Corridor**, specifically Wymondham and Hethersett - the cumulative impact of a high proportion of these sites coming forward in this location could require substantial sustainable mitigation measures.
- **A47 Corridor**, specifically Costessey and Easton; the edge of Norwich City; and Acle. The majority of development sites in these areas will impact on the A47, with the result that several Trunk Road junctions would see an increase in traffic which would need to be mitigated.

Implications of the GNDP Water Cycle Study:

- 8.18 The conclusions of this study have important implications for the cumulative suitability of the housing sites appraised. Whilst this has been factored into the 'strategic utilities constraints' criterion in the cost factors identified above, critical utilities constraints need to be overcome to allow significant residential development in certain locations of the GNDP area, specifically:
- GNDP South Sector, in the vicinity of Swardeston;
 - West Sector, incorporating New Costessey;
 - Reepham;
 - Aylsham;
 - Acle; and
 - Harleston.
- 8.19 In these locations, the study concludes that there is very limited potential for development without significant investment in mitigation measures. Without this investment, the cumulative deliverability and developability of sites in these locations would be called into question without the necessary funding contributions and investment in water resources.
- 8.20 To illustrate this point, the town of Aylsham is identified as having **no current growth potential** in the Water Cycle Study. However, two sites were considered to be deliverable in the first 5 years (which could result in 16 dwellings coming forward for development), whilst ten sites were considered to be developable after five years (contributing a further 3,376 dwellings by 2024).
- 8.21 Clearly, whilst the SHLAA appraisal indicates that these 12 sites in Aylsham are suitable, available and achievable and hence could form part of Broadland's housing capacity figures, they cannot all come forward immediately given the identified infrastructure restrictions in the town. It will be for the District Council to make a policy choice as to which of these sites, if any, should come forward over the plan period, and if further investment is necessary to overcome the infrastructure bottlenecks. This issue is a recurring theme for the towns and broad areas of search highlighted above and the District Councils responsible for these areas will need to make difficult policy choices often with significant cost implications.

9.0 Deliverability and Developability

Introduction

9.1 This section draws upon the preceding analysis of the suitability, availability and achievability assessments. A judgement has been made regarding whether the identified sites can be considered deliverable, developable or not currently developable for housing development, based on if and when they are likely to come forward. This has allowed an overall indicative housing trajectory to be devised for each District, identifying the deliverable and developable dwelling completions on these sites.

Approach

9.2 Following the results of the suitability, availability and achievability assessments, a series of 5-year site trajectories were developed for each District, based on the following considerations:

Deliverable (0-5 years):

- Under Construction (not yet complete);
- Planning Permission – Houses or small number of flats development;
- A Resolution to Grant – Houses or small number of flats development;
- Positive Ownership – No Negative Cost or Market Factors;
- Positive Ownership – Single Negative Cost or Market Factors – No cumulative cost/market impacts.

Developable (5+ years):

- Planning Permission – Large number of apartments/flats development i.e. no market for product - or other identified delaying factor;
- A Resolution to Grant - Large number of apartments/flats development - or other identified delaying factor;
- Neutral/Positive Ownership but currently identified as an unviable scheme or subject to delay - No Negative Cost/Market Factors or Single Negative that can be overcome;
- No Ownership - No Negative Cost or Market Factors;
- No Ownership - Single Negative Cost or Market Factor that can be overcome;
- Positive/Neutral Ownership - Two Negative Cost Factors - Potential Issues;
- No Ownership - Two Negative Cost Factors - Potential Issues.

Not Developable (Nil Housing Potential):

- Positive/Neutral Ownership - 3+ Negative Cost/Market Factors - Cumulative Cost;
- No Ownership - 3+ Negative Cost/Market Factors - Cumulative Costs;
- Negative Ownership - unlikely to be available;
- Not Suitable/Site Complete.

9.3 The potential housing supply for each district has subsequently been identified, based on the criteria assessed in Stages 7a-d. This appraisal has been based upon data provided by the three local authorities involved, and through

discussions with commercial agents / housing developers and other key stakeholders.

Housing Capacity Results

- 9.4 As required by the CLG Guidance, the scope of the assessment has not been narrowed down by existing policies designed to constrain development. All 515 sites put forward by the three districts have been appraised on their merits to ensure the local authorities are in the best possible position when it comes to decide upon their strategy for delivering their housing objectives.
- 9.5 Following the approach set out above, a full breakdown for phasing each individual site has been derived to provide potential dwelling completions, and is presented in detail in Appendix 10. An initial site based summary analysis is provided in Table 11.

Site Classification	Norwich		Broadland		South Norfolk	
	Total Sites	Total Capacity	Total Sites	Total Capacity	Total Sites	Total Capacity
A: Under Construction (not yet complete)	5	333	2	520	13	2,593
B: Planning Permission - Houses or small number of flats	8	329	2	1,489	6	428
C: A Resolution to Grant - Houses or small number of flats	5	1,525	2	1,233	0	0
D: Positive Ownership - No Negative Cost or Market Factors	5	728	9	1,653	14	1,260
E: Positive Ownership - Single Negative Cost or Market Factor – No cumulative cost/market impacts	1	412	33	21,859	41	16,645
Total Sites with Start Within 5 Years:	24	3,327	48	26,754	74	20,926
F: Planning Permission - Large apartment development i.e. No Market for development - or other identified delaying factor	16	1,244	1	19	0	0
G: A Resolution to Grant - Large Apartment Development i.e. No Market for development - or other identified delaying factor	3	309	0	0	0	0
H: Neutral/Positive Ownership but currently identified as an unviable scheme/subject to delay/likely to be large amount of flats - No/Single Negative Cost or Market Factor	3	415	4	1,573	4	7,098
I: No Ownership Information - No Negative Cost or Market Factors	54	2,282	24	1,523	20	1,697
J: No Ownership Information - Single Negative Cost or Market Factor that can be overcome	12	1,576	43	24,758	53	15,275
K: Positive/Neutral Ownership - Two Negative Cost Factors	0	0	17	21,742	27	9,221
L: No Ownership Information - Two Negative Cost Factors	0	0	15	2,828	18	6,183
Total Sites with Start Beyond 5 Years:	88	5,826	104	52,443	122	39,474
M: Positive/Neutral Ownership - 3+ Negative Cost Factors - Cumulative Costs	0	0	0	0	4	10,476
N: No Ownership Information - 3+ Negative Cost Factors - Cumulative Costs	0	0	3	679	7	1,167
O: Negative Ownership Factors - unlikely to be available	5	511	2	820	1	261
P: Not Suitable/Site Complete	8	33	14	5,725	11	8,528
Total Not Deliverable or Developable:	13	544	19	7,224	23	20,432
Totals:	125	9,697	171	86,421	219	80,832
of which Suitable:	117	9,664	157	80,696	208	72,304

Table 11 Summary Site Classifications

Norwich City

- 9.6 The initial desktop exercise identified 125 potential housing sites in Norwich City. Of these sites, 5 were under construction as of 1 April 2009, whilst a further 32 had extant planning permission / a resolution to grant for residential development. This represents the highest number of 'committed' housing sites in the GNDP area; however, it is recognised that a large proportion of these sites were located on brownfield land and featured relatively high density apartment schemes, which, given the current stagnation of the market, resulted in the viability of a number of schemes being called into question.
- 9.7 This is reflected in the results for the overall deliverability and developability of sites in Norwich City:
- **24 sites, comprising capacity for 3,327 dwellings, are considered deliverable**, to start within the first 5 years;
 - **88 sites, comprising capacity for 5,826 dwellings, are considered developable**, starting beyond 5 years;
 - **13 sites, comprising capacity for 544 dwellings, are considered not to be deliverable or developable.**

Broadland

- 9.8 Of the 171 sites initially identified in Broadland District for appraisal, some 157 sites were considered 'suitable' to accommodate housing. Just six sites are under construction or have outstanding planning permission/a resolution to grant, representing the lowest proportion of 'committed' housing sites in the GNDP area. The results for the overall deliverability and developability of sites in Broadland are summarised as follows:
- **48 sites, comprising capacity for 26,754 dwellings, are considered deliverable**, to start within the first 5 years;
 - **104 sites, comprising capacity for 52,443 dwellings, are considered developable**, starting beyond 5 years;
 - **19 sites, comprising capacity for 7,224 dwellings, are considered not to be deliverable or developable.**

South Norfolk

- 9.9 South Norfolk had the highest number of potential sites (219) put forward for appraisal in the SHLAA, 208 of which were considered to be 'suitable' for residential development. Some 19 sites, capable of accommodating around 3,021 dwellings, are under construction / have extant planning permission for residential development and are considered deliverable in the first five years. Other key points include the following:
- **74 sites, comprising capacity for 20,926 dwellings, are considered deliverable**, to start within the first 5 years;

- **122 sites, comprising capacity for 39,474 dwellings, are considered developable,** starting beyond 5 years;
- **23 sites, comprising capacity for 20,432 dwellings, are considered not to be deliverable or developable.**

What Housing Capacity Shows

- 9.10 These numbers represent the total capacity of the sites identified as appropriate to deliver housing development. They show whether or not the individual sites assessed have a reasonable prospect of being developed for housing (and if so when) without giving priority to any particular spatial distribution of sites or taking account of other legitimate planning judgements outside the scope of Stage 7 of the SHLAA. They are intended to provide an initial basis upon which each authority can assess whether they have enough sites to meet overall housing requirements.
- 9.11 It is also the case that there are cumulative market capacity issues to consider, in terms of the extent to which all identified deliverable and developable sites will be able to actually come forward without creating over-supply.

Phasing and Forward Trajectory

- 9.12 Having identified the deliverability and developability of sites an indicative trajectory has been identified to give the deliverability and developability of sites in terms of actual dwelling completions. This indicative trajectory does not seek to make a judgement on the cumulative impact of these housing numbers coming forward on issues such as infrastructure or the market deliverability, but does provide a starting point for consideration of whether there are enough sites to meet each authority's housing requirements.
- 9.13 The outputs from the results on the deliverability and developability of sites were translated into 5-year phases, with deliverable sites starting in the first 5-year tranche and developable sites starting in the second 5-year tranche unless specific factors for an individual site were identified. The phasing and indicative trajectory was based on the following:
- Any site specific information identified by owners and/or developers either on phasing, or other issues which would realistically impact phasing, has been taken account of in the phasing and is taken as identified.
 - Phasing of sites adopts the build rates identified in Section 8.0. This means that the capacity of some sites is stretched across different 5-year tranches.
 - Sites identified as deliverable that are under construction, with planning permission or with a resolution to grant planning permission were assumed to be able to commence development within the first year. Deliverable sites without planning permission were assumed to have a notional planning period with a one year impact on phasing.

- Developable sites where no other information was available on likely phasing are assumed to start at the beginning of the second 5-year tranche (i.e. in 2015)

9.14 Adopting these principles, the indicative trajectory for each district is identified in Table 12. This provides anticipated completions which is the basis for the deliverability and developability of dwellings.

Local Authority	2009-2014	2015-2019	2020-2024	2024+	TOTAL
Norwich	2,695	6,458	0	0	9,153
Broadland	12,252	34,848	11,724	20,373	79,197
South Norfolk	14,395	33,364	5,175	7,466	60,400
Total	29,342	74,670	16,899	27,839	148,750

Table 12 Phasing of all Deliverable/Developable sites in the Greater Norwich Area

9.15 In total, it is estimated that the GNDP area potentially has an unconstrained housing capacity of **148,750 dwellings, of which 29,342 could be deliverable in the first five years**. This is summarised for each authority as follows:

Norwich City

- **2,695 dwellings are considered deliverable**, to be completed within the first 5 years; and
- **6,458 dwellings are considered developable**, to be completed beyond 5 years.

Broadland

- **12,252 dwellings are considered deliverable**, to be completed within the first 5 years; and
- **66,945 dwellings are considered developable**, to be completed beyond 5 years.

South Norfolk

- **14,395 dwellings are considered deliverable**, to be completed within the first 5 years; and
- **46,005 dwellings are considered developable**, to be completed beyond 5 years.

9.16 Of the three Districts, Broadland has the greatest housing capacity, with sites capable of providing almost 80,000 new homes over the plan period. This is in contrast to Norwich City, which has a limited number of suitable and achievable sites identified through this SHLAA, particularly in the short term.

Comparison with the East of England RSS Requirement

9.17 The East of England Plan (2008) sets out the housing requirement for each of the three GNDP Authorities. Table 13 provides a summary of this 20 year

requirement and considers the residual requirement taking into account dwelling completions to 31st March 2008.

	Broadland	Norwich	South Norfolk
RSS Total Requirement 2001-2021	12,200	14,100	11,200
Dwellings Completed April 2001- March 2008	2,375	5,484	4,107
RSS Residual Requirement (13 years)	9,825	8,616	7,093
RSS Residual Annual Requirement	756	663	546

Table 13 East of England RSS Requirement (Source: East of England Plan, Annual Monitoring Reports and NLP Analysis)

9.18

In reviewing these as average annual figures over the period 2001-2006 against the RSS figures, it can be seen from Fig 7 that Norwich City’s historic completions rates are slightly higher than the residual RSS requirement. However, Broadland District Council’s historic delivery rate is less than half of the residual requirement.

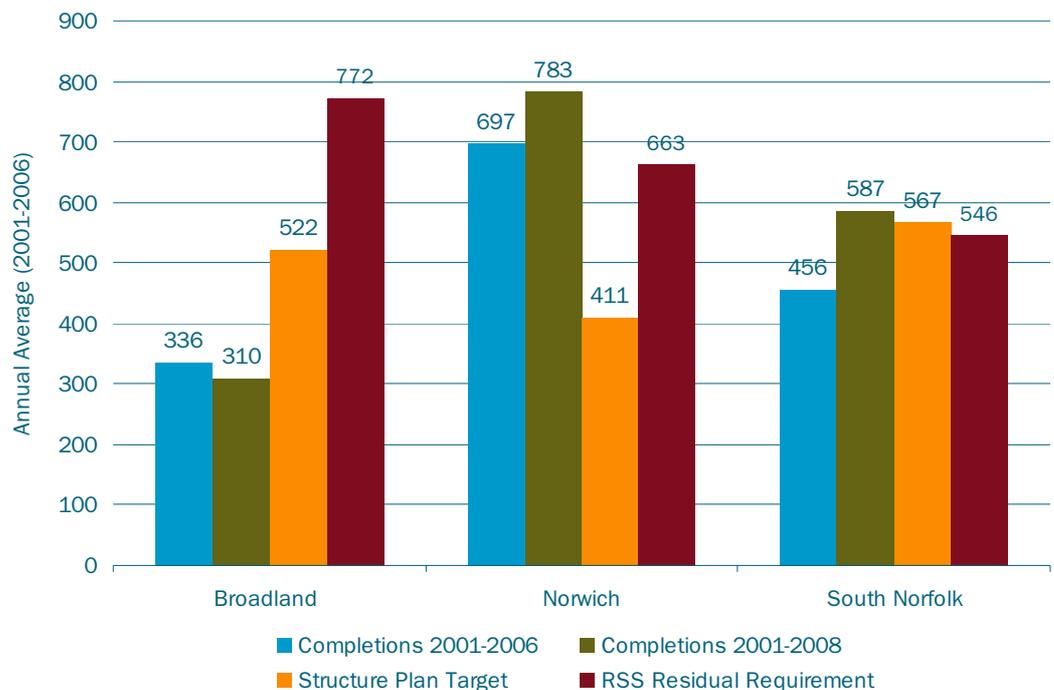


Fig 7 Annual Average Completions in Comparison with Strategic Requirements 2001-2006

9.19

Though the period 2001-2006 shows that both South Norfolk and Broadland have had a low delivery rate, taking into account figures up to 2008 shows that net dwelling completions per annum in both Norwich and South Norfolk were both above the RSS requirements before the recession. Fig 8 shows net annual completions against the residual average annual requirement for each authority, illustrating that between 2006 and 2008 both South Norfolk and Norwich’s housebuilding performance were well above the level their residual

requirements necessitated. Broadland's level of completions remained low, causing its residual annual requirement to continue to increase.



Fig 8 Net Dwelling Completions and Residual Annual Requirement 2001-2008

9.20

In terms of demonstrating a deliverable supply of housing over the next five years, the indicative trajectory for this period shows that both Broadland and South Norfolk both have a substantial supply of housing sites well above the RSS residual requirements, although Norwich City appears to have an under supply at present, although this is based solely on sites included in Stage 7 of the SHLAA:

- **Broadland District:** 12,252 deliverable dwellings 2009-14, against an RSS requirement of 3,500 (with a residual requirement of 3,779);
- **Norwich City:** 2,695 deliverable dwellings 2009-14, against an RSS requirement of 3,550 (with a residual requirement of 3,314);
- **South Norfolk District:** 14,395 deliverable dwellings 2009-14, against an RSS requirement of 2,950 (with a residual requirement of 2,728);

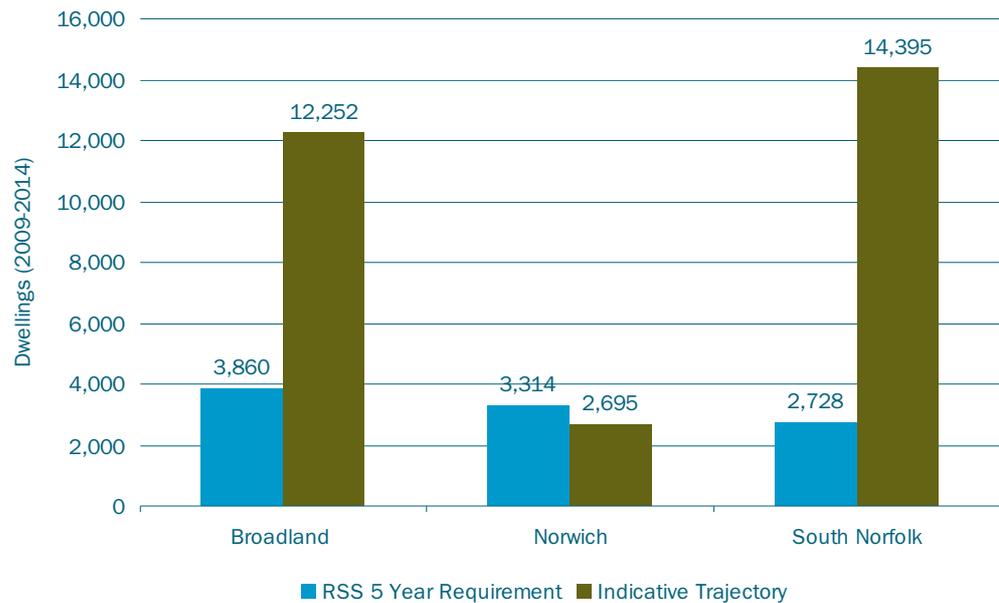


Fig 9 5-year supply of deliverable housing sites – comparison with the RSS requirements

9.21

The East of England RSS does, however, allow the three Local Authorities to combine their overall requirements. Consequently, the potential shortfall in deliverable sites within Norwich City for the first five years can be compensated for by the high levels of housing that could potentially be delivered in the two adjoining Districts. Consequently, for the GNDP area as a whole for the first five years, a total of 29,320 dwellings could potentially be delivered, against an RSS requirement of 10,000 (with a residual requirement of 9,902). It should be remembered that the RSS housing requirement is a minimum rather than a maximum, and that the RSS is subject to an early review by 2011, which will be required to test the far higher NHPAU housing figures as part of the plan preparation.

9.22

Looking beyond 2021, there is a further requirement to deliver an additional 10,000 dwellings between 2008 and 2026 as a result of the area's Growth Point Status. 8,800 of this additional requirement will be brought forward within the Norwich Policy Area, while the remaining 2,200 will be in the Rural Areas. In considering this additional requirement, the GNDP will need to deliver at least a total of 35,743 dwellings over the next 18 years. The Growth Point Status means that an additional 583 dwellings will need to be completed each year with a five year requirement of 2,917 dwellings. This, in addition to the 9,902 dwellings required through the RSS, the GNDP area will need to deliver a total of 12,819 dwellings between 2009-2014. Based upon the suitability, achievability and availability analysis undertaken to inform the indicative trajectory, there continues to be a sufficient number of sites which could potentially deliver the required number of dwellings.

10.0 Conclusions

Introduction

- 10.1 This commission has comprised Stage 7 of the CLG guidance on undertaking SHLAAs, specifically assessing whether and when sites are likely to be developed for housing. In addition to undertaking site appraisals and deriving an estimation of the deliverability and developability of some 515 potential housing sites in the Districts of Broadland, Norwich City and South Norfolk, an indicative housing trajectory has also been developed to indicate phasing and compliance with RSS housing projections and growth point development aspirations.
- 10.2 As noted in the guidance, assessing the suitability, availability and achievability of a site will provide the information on which a judgement can be made in the plan-making context as to whether a site can be considered deliverable, developable or not currently developable for housing development. The evidence presented in this report represents an objective view of the housing potential for sites and will assist the three Local Authorities in taking policy decisions during the LDF preparation process. This final Section of the report summarises the main findings and provides a series of recommendations for the final stages of the SHLAA.

Key Findings

- 10.3 The Stage 7 Study of the SHLAA has revealed a high level of potential sites which are considered suitable, available and achievable within the GNDP area.
- 10.4 In total, it is estimated that the GNDP area potentially has an unconstrained housing capacity of **148,750 dwellings, of which 29,320 could be deliverable in the first five years**. When compared with the RSS requirement and factoring in the forecast housing growth resulting from the Norwich Growth Point Bid (25,534 RSS residual requirement as of April 2008, plus an additional 10,000 dwellings to 2026 as a result of the growth point), there is the potential for the delivery of more than four times as many dwellings in the GNDP area, compared to requirements (see Table 14). Clearly, the GNDP area as a whole has more than enough deliverable sites to ensure a five year forward supply, although on an individual level Norwich City potentially has an under-supply of around 600 units, although this does not take into account sites not addressed as part of the SHLAA.
- 10.5 Clearly, it is important to caveat these findings and ensure an element of realism is applied, and whilst these figures represent the output of the SHLAA assessment there may be alternative sites not identified which are delivering housing completions, and therefore these outputs should be compared and reconciled with the outputs of the Annual Monitoring Report.

10.6 Norwich City has delivered dwelling numbers in line with the RSS requirement and in line with the current level of supply in the short term and South Norfolk underwent a recent surge in housing completions also ensuring it was in line with the RSS requirement. However, Broadland has not delivered housing in line with the RSS requirement. Broadland's difficulties are likely to be a function of restricted release of sites for housing, which was in line with the targets of the time, but also more recently the downturn in the housing market. Nonetheless, it is highly unlikely that the housing numbers indicated in Table 14 could be achieved across the area without changes in several key areas, these include, inter alia: expediting the consideration of sites through the planning process, making substantial investment in local infrastructure, where this is necessary, and drastic improvements to the depressed housing market conditions. It is important, therefore, to emphasise that the SHLAA remains the starting point for the GNDP and their collective responsibility to prepare LDFs to ensure that there is an adequate housing land supply to meet the needs of this area.

Local Authority	Deliverable Dwellings (5-year forward supply)	Developable Dwellings 2015-2024+	TOTAL Housing Capacity	RSS Residual Annual Requirement
Norwich	2,695	6,458	9,153	756
Broadland	12,230	66,967	79,197	663
South Norfolk	14,395	46,005	60,400	546
Total	28,847	119,903	148,750	1,965

Table 14 Summary Findings – Deliverable and Developable Dwellings from SHLAA Sites

10.7 The GNDP now need to review these findings and begin to consider which sites should be included within their Site Allocations DPD. The decisions over which sites will be allocated will be based upon the policy directions that the three Local Authorities decide to take through the Core Strategy.

Recommendations

10.8 It is recommended that the GNDP undertake a number of tasks to refine the findings of the Stage 7 Study which will further develop the sound foundation for their respective LDFs:

- a **Density Multiplier:** A series of standard density multipliers have been applied by the Authorities across the GNDP area as indicated in Table 4 of the GNDP methodology. Whilst the multipliers applied outside of Norwich City are acceptable and in line with RSS policy, there is a question over the deliverability of the densities of 50 and 100 applied within the Norwich City Administrative Area and, in particular, the City Centre. The Stakeholder Workshop highlighted concerns with these levels and, as discussed as part of the market factors section of the achievability analysis, it is open to discussion whether these average densities can be achieved. The GNDP

may therefore wish to consider whether these densities, are achievable or whether they need to be reviewed.

- b **Unconstrained Capacity Figures:** The GNDP supplied unconstrained capacity figures for each site as part of work undertaken for Stage 6. These unconstrained capacities comprise a straightforward multiplication of the red line boundary area for the SHLAA site with the density multiplier and provide a rough indication of potential capacity. Notwithstanding the concerns regarding the multiplier as detailed in a), it is recommended that the GNDP undertake further research with a view to identifying constrained capacity figures for each site. It is recognised that this may be a complicated task but, given the Stage 7 findings, it may be a necessary one. For example, where there are known constraints, such as landscape features, electricity pylons, or highway improvement requirements on the site, these should be factored into any such constrained capacity calculation. In addition to this, many of the larger sites are likely to come forward as part of mixed use schemes which may significantly reduce the housing capacity on the site. One clear example could be the Rackheath Eco-Town site, should it come forward as suggested in the current Masterplan. Further work on the constrained capacity levels will provide the GNDP with a more realistic potential housing land supply to inform the Core Strategy and Site Allocations DPDs.
- c **Site boundaries:** Many proposed development sites have been split in a way that is contrary to the boundary extents that are being promoted by developers. In some cases this has had the effect of reducing the suitability of a site, where in fact the intention on the part of the developers, is to develop a number of sites as a comprehensive scheme which would eliminate suitability concerns. This also has impacted on the availability of some sites, whereby a developer may be promoting a portion of a site for development, which may be deliverable as a stand alone development, but in consideration of the SHLAA site, as a whole, other interests may prevent the site from being identified as available immediately. When considering the inclusion of particular sites for the Site Allocations DPD, the GNDP may wish to review these site boundaries in agreement with the promoters of the sites.
- d **Ownership Details:** GNDP identified the SHLAA sites to incorporate a wide range of potential sites that may not have come forward through a call for sites exercise. Therefore, a comprehensive database of ownership details has not been collected, although the GNDP used its best endeavours to provide this information, taking account of data availability and resource constraints. As a result, the availability and achievability analysis has been undertaken without a full understanding of certain availability constraints for certain sites. Where this detail was unavailable, the Stage 7 Study has taken a positive viewpoint, considering it a question of timing rather than of ultimate landowner objection to any housing development. However, without a complete picture of whether the sites can truly be considered available, the Stage 7 Study figures can only be treated as an indication of

potential. It is recommended that the GNDP review the availability of each of the sites to gain a better understanding on the housing land supply from the Site Allocations Call for Sites exercise recently undertaken and, if necessary, through land registry searches.

- e **Infrastructure Provision:** The suitability and achievability analyses undertaken as part of the Stage 7 Study has to some extent taken into account the constraints posed by infrastructure requirements such as sewage and highway capacity. However, without a detailed understanding of the complete nature and timescales of all proposed infrastructure works such as the Northern Distributor Road, there is scope to do more to identify how and when each of these constraints can be overcome. As part of the preparation of the Core Strategy and for the Site Allocations DPD, through discussions with the infrastructure providers, the GNDP should identify an infrastructure vision for the area which should seek to identify in detail if and when these will be resolved. When this has been established, the SHLAA sites should then be reviewed in the light of this information.
- f **Consider developer proposals:** The developers/agents consulted have raised concerns that the GNDP has not considered studies which address some suitability factors for particular sites previously been put forward to each of the Local Authorities. As part of the Site Allocations DPD, it is suggested that the GNDP consider such information further and use it to inform the final allocations.
- g **Market capacity issues:** In applying the results of the Stage 7 SHLAA in deciding upon a housing trajectory and spatial strategy for the district, there will be a need to further consider the cumulative market capacity issues which are, by definition, not possible to fully test in advance of having a spatial strategy that prioritises or chooses between alternative sites.

10.9

This SHLAA Stage 7 Assessment reveals a considerable number of suitable sites, with a substantial capacity for development of new dwellings, which the local authorities can work within. This gives scope for GNDP to work further on the identification of availability and achievability issues to underpin the production of Joint Core Strategy and to support the making key spatial choices for housing development within the GNDP area, taking account of overall market capacity issues.