

# Strategic Housing and Economic Land Availability Assessment

## Methodology Consultation

October 2015

[www.waveney.gov.uk/newlocalplan](http://www.waveney.gov.uk/newlocalplan)

**Consultation Period: 9<sup>th</sup> October 2015 to 27th November 2015**



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# 1 Introduction

- 1.1 The purpose of this assessment is to identify the future supply of land which could help deliver the objectively assessed needs identified for housing and economic development in Waveney across the plan period of the emerging Local Plan (2011-2036). Economic development includes employment land development such as office, industrial, and warehouses and main town centre uses such as retail, leisure and town centre offices. Objectively assessed needs will be identified through assessments of need for housing, employment land and retail and leisure uses. These assessments are currently under preparation. It is likely these assessments will be refined throughout the plan making process.
- 1.2 The assessment forms a key part of the emerging Local Plan's evidence base. Importantly, it will test whether there is sufficient land to meet objectively assessed needs and identifies where this land is located. It will therefore help the Council understand the level of growth it can plan for and the areas of the District where the growth can be accommodated. At a more detailed level it will also help the Council choose the best individual sites to allocate in the Local Plan to meet the growth planned.
- 1.3 The assessment will cover the Waveney District Council administrative area (excluding the Broads). This is the same area the emerging Local Plan covers and comprises the Waveney Housing Market Area and the Waveney Functional Economic Area. The methodology and approach has been worked up with Great Yarmouth Borough Council. Although the two Council's do not share a local housing market area or economic area there is clearly cross-boundary movement in the markets and a consistent methodology across the two areas is considered beneficial and in line with the Duty to Cooperate.
- 1.4 The methodology for this assessment is in accordance with the guidance set out in the "Housing and Economic Land Availability Assessment" section of the National Planning Practice Guidance.
- 1.5 **This assessment does not in itself determine whether a site should be allocated or given planning permission for development. The determination of a site as 'suitable' in this assessment does not imply or guarantee that planning permission would be granted should an application be submitted for consideration.**

In line with the guidance in the National Planning Policy Framework and the National Planning Practice Guidance this methodology has been made available for consultation to get key stakeholders views on the approach to be used to assessing the amount land available for development in the District.

## 2 Proposed Methodology

- 2.1 The assessment will consist of five stages which are discussed below. These stages are based on those expressed in the National Planning Practice Guidance. The flow chart shown in [Figure 2.1](#) below summarises the methodology.

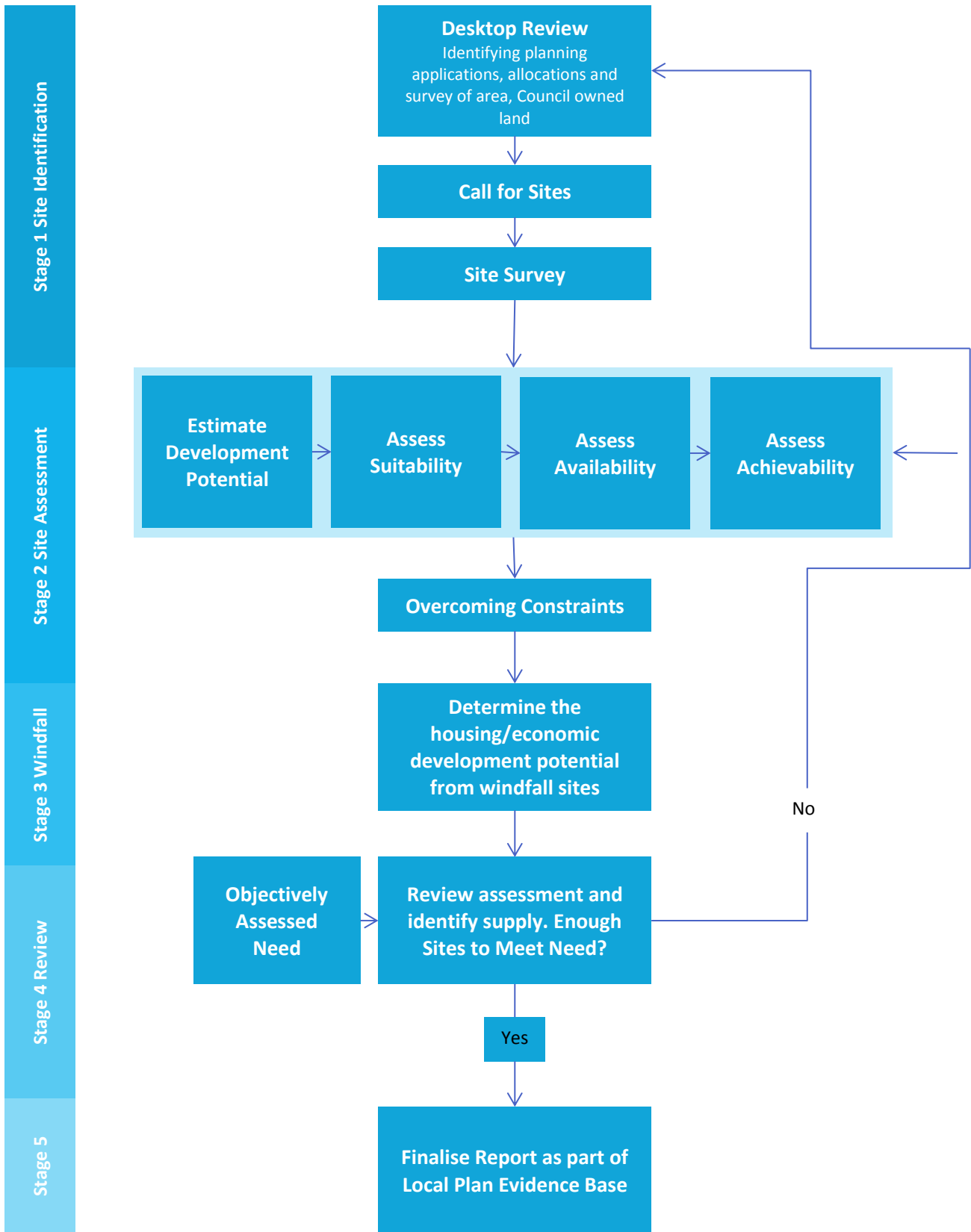


Figure 2.1 Summary of Methodology

## Stage 1: Site Identification

2.2 The assessment aims to identify the amount of land available for housing and employment development. Sites will be identified from numerous sources detailed below:

- Sites with planning permissions for housing or economic uses which are unimplemented or under construction
- Sites allocated in the existing Local Plan for housing or economic development (Local Development Framework) which are unimplemented
- Sites which have had planning permission refused or withdrawn
- Land in the Council's ownership
- Vacant, derelict and underused land identified from maps and local knowledge
- Real Estate for Sale
- Call for sites

2.3 A call for sites has been issued with this consultation. The aim of this is to encourage, landowners, developers and others to let the Council know about available and potentially available sites in the District. The Council is interested to the availability of all types of site in all locations of the District. These include previously developed sites and undeveloped greenfield land, land in and around towns and land in and around villages. More information about the call for sites can be found at [www.waveney.gov.uk/newlocalplan](http://www.waveney.gov.uk/newlocalplan).

2.4 The assessment will focus on sites above 0.25 hectares in size<sup>1</sup>. This threshold does not apply to sites with planning permission. The contribution from these sites, regardless of size, will be counted towards the land availability of the District.

2.5 All identified sites (apart from sites with planning permission) will be surveyed through desktop review. The desktop review will check constraints and designations affecting sites. At this stage it may be necessary to exclude some sites from the assessments as the development of the site would clearly contravene national planning policy and legislation. Sites will be excluded from further assessment in the following circumstances:

- Sites within Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites (including potential SPAs, possible SACs, and proposed Ramsars sites). Sites within Sites of Special Scientific Interest, National Nature Reserves and Ancient Woodland. European Legislation and/or the National Planning Policy Framework prohibit development affecting these sites and development within the designation is likely to result in direct loss.
- Sites within Flood Zone 3b<sup>2</sup>.

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<sup>1</sup> See para 10 of the Housing and Economic Land Availability Assessment Guidance on the National Planning Practice Guidance website

- Sites where the development would result in the destruction of a grade II, grade II\* and grade I listed buildings or registered parks and gardens or schedule ancient monuments.

## Stage 2: Site Assessment

- 2.6 The purpose of this stage is to determine whether sites are deliverable or developable<sup>3</sup>. Deliverable sites are sites which are suitable, available now and achievable within five years. Developable sites are sites which are a suitable with a reasonable prospect they could be available and achievable within the plan period.
- 2.7 With the exception of sites already with planning permission, all sites identified in the assessment will be subject to the full site assessment identified below. All sites with planning permission are assumed to be deliverable unless there is clear evidence a site will not come forward within the plan period.
- 2.8 The assessment will be based on the information gathered through the desktop review and through site visits.

### Estimating Development Potential

- 2.9 The way the development potential will be worked out is different depending on whether a site is being considered for housing, employment, or town centre uses. For sites with planning permission, the number of homes or the floorspace of employment or town centre development granted with the planning permission has been used to establish the amount of development yielded from the site.

#### *Development Potential for Housing*

- 2.10 The development potential of housing will be calculated using a mixed methods approach. As a starting point density multipliers will be used based on existing policy set out in Policy DM16 of the Council's Development Management Policies Development. This sets out a minimum density of 30 dwellings per hectare across most of the District. A higher density of 50 dwellings per hectare is sought in central areas of Lowestoft and the Market Towns. The Council will need to review density policies as part of the new Local Plan as these were based on former national planning policy prior to the publication of the National Planning Policy Framework. This assessment will help inform this review. Nevertheless, these above densities

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<sup>2</sup> Flood zones are defined by the Environment Agency and are present on the Environment Agency's flood map. Flood Zone 3b represents the functional flood plain and its purpose is for storing water in times of flood. These areas have greater than a 5% chance of flooding (1 in 20 year event). Table 3 of the National Planning Practice Guidance states that only water compatible and essential infrastructure development is appropriate in Flood Zone 3b.

<sup>3</sup> See footnote 11 of the National Planning Policy Framework.

are still seen as useful baseline to inform site capacity as many developments have been built to these densities over recent years.

- 2.11 Alternatively, where there is existing information available on the capacity of a site this will be used as a starting point. This information could include masterplans or schemes worked up as part of pre-application discussions or historic planning applications or from masterplans submitted through the 'call for sites' process.
- 2.12 The individual characteristics of a site will also be taken into account including the surrounding residential density and character. Where appropriate the development potential of the site will be altered accordingly. Consideration will also be given to the effects of site shape and topography on development potential.
- 2.13 For larger sites where on-site infrastructure may be required the development potential will need to take into account the land requirements for such infrastructure. Such infrastructure could include open space, primary schools, and community facilities. Assumptions will be based on site location and local infrastructure need.

#### *Development Potential for Employment Land*

- 2.14 Employment land need is already expressed in land area in hectares in the Ipswich and Waveney Employment Land Needs Assessment. This need takes into account local plot ratios for the types of development which are expected to be seen. The development potential of a site will therefore be dependant on whether there are any constraints on a site which render parts of the site undevelopable (for example an irregular shaped site). If there are sites identified in town centres which are suitable and available for office development, a different approach may be needed as these maybe more dense than the average plot ratios identified in the needs assessment.

#### *Development Potential for Town Centre Uses*

- 2.15 Town centre needs are expressed in floorspace requirements. Floorspace need for Waveney will be set out in the emerging Retail and Leisure Needs Assessment. Due to vast differences in types of use and formats of this type of development, the development potential of sites for town centre uses will be calculated on a site by site basis considering the possible uses and surrounding development.

#### **Assessment of Suitability**

- 2.16 The suitability of a site is influenced by national planning policy, local planning policy (where policy is up to date) and other factors including physical constraints affecting the site, the impacts of the development of the site, the market attractiveness of the sites proposed use and location, its contribution to regeneration and the impacts on amenity and environment of neighbouring areas.



- 2.17 To assess the suitability of sites a 'red', 'amber' 'green' approach will be applied to assessing the various types of constraints and impacts which may affect the development of sites. Some sites will have impacts and constraints which are insurmountable and thus undermine the suitability of development. Other sites will have impacts and constraints which are surmountable, however, they may be costly to overcome and have an impact on the achievability of development.
- 2.18 'Red' impacts and constraints rule out the suitability of a site. Any site assessed as 'red' against any type of constraint or impact will be discounted from the assessment as the site will not be suitable for development. 'Amber' impacts and constraints do not rule out the suitability of development. However, some mitigation will be required in order for the site to be suitable. Therefore, sites assessed as 'amber' against any type of constraint or impact will be considered suitable providing those constraints can be overcome. The 'green' category represents no constraint or impact with respect to that type of impact or constraint.
- 2.19 The following types of constraint and impact will be considered in terms of assessing suitability:
- Constraints:
- Access to site
  - Utilities Capacity
  - Utilities Infrastructure
  - Contamination
  - Flood Risk
  - Coastal Erosion
  - Market Attractiveness
- Impacts:
- Landscape/Townscape
  - Biodiversity and Geodiversity
  - Historic Environment
  - Open Space
  - Transport and Roads
  - Compatibility with Neighbouring Uses
  - Contribution to Regeneration
- 2.20 Further details on how the Council will assess the suitability against each of the above constraints and impacts are included in Appendix A.

## **Assessment of Availability**

- 2.21 A site will normally be considered available if the site is in the ownership of a developer or landowner who has expressed an intention to develop or sell land for development. This will be ascertained primarily through the call for sites but also through targeted consultation with developers and landowners of identified sites.
- 2.22 Sites with unresolved ownership problems such as multiple ownerships with no agreements, ransom strips, tenancies and covenants will not be considered available unless there is a reasonable prospect the constraints can be overcome.

### **Assessment of Achievability**

- 2.23 A site will be considered achievable where there is a reasonable prospect that development will occur on the site at a particular point in time. A key determinant of this will be the economic viability of the site. This will be influenced by the market attractiveness of a site, its location in respect of property markets and any abnormal constraints on the site.
- 2.24 Evidence from previous viability studies conducted in Waveney<sup>4</sup> suggests that the vast majority of sites for residential use will be viable unless there are abnormally severe constraints. The situation with respect to non-residential development is more complex and there is less certainty about the viability of sites and it is likely that only sites with minimal constraints will be viable.
- 2.25 To help assess the viability of sites, information will be sought from landowners and developers through the call for sites. All suitable and available sites will be assessed for viability in a 'Whole Plan Viability' assessment which will be conducted prior to the Local Plan being published.
- 2.26 Another factor affecting achievability will be the capacity of a developer to complete and let or sell the development over a certain period. Feedback will be sought from developers on typical build out rates.

### **Overcoming Constraints**

- 2.27 Where constraints have been identified in either the suitability, availability or achievability of a site the Council will consider if there are any actions which could be undertaken to remove or mitigate the constraints, for example the provision of new infrastructure.

## **Stage 3: Housing and Economic Development Potential from Windfall Sites**

- 2.28 Windfall sites are sites which have not been specifically identified as part of the Local Plan process. The term covers previously-developed sites that have unexpectedly become

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<sup>4</sup> Waveney CIL Viability Study (March 2012), Affordable Housing Viability Study (September 2009)

available, ranging from large sites (e.g. resulting from a factory closure) to small sites such as a residential conversion or a new flat over a shop.

- 2.29 Windfall sites for housing and economic development have provided an important source of development in Waveney and there is no reason to believe that these trends should not continue into the future.
- 2.30 To assess the windfall potential of both housing and economic development, past trends will be analysed and extrapolated forward over the plan periods.
- 2.31 The National Planning Policy Framework prohibits the inclusion of development on garden land from windfall allowances therefore trend data from development on garden land will be excluded from the analysis.
- 2.32 In order to avoid potential double counting with sites identified in Stage 1 only average delivery rates for sites under 0.25 hectares will be considered.
- 2.33 A consideration of whether future trends will change is necessary. Land is a finite resource and overtime there will become less windfall opportunities. Therefore, this needs to be reflected when calculating the future potential of windfall.
- 2.34 Many existing planning permissions which will be built out over the next few years are windfall sites and therefore when extrapolating windfall trends forward it is important not to double count the contribution of windfall sites. Therefore the windfall allowance will only be applied from year 3 onwards and be relative to the expected delivery of sites already with planning permission on windfall sites.

#### **Stage 4: Review**

- 2.35 The total capacity of land for each use will be totalled and compared against the objectively assessed need for each use. If sufficient numbers of sites are not found to meet the objectively assessed needs, the Council will try to identify further sites. The Council may also undertake a reassessment of the development potential of already identified sites to see if the development potential could be increased (for example through higher densities).

### **3 Next Steps**

- 3.1 Consultation on this draft methodology will take place from 9th October to the 20<sup>th</sup> November 2015. A call for sites has also been issued. Sites can be submitted up to 8<sup>th</sup> January 2016. More details on this are available at [www.waveney.gov.uk/newlocalplan](http://www.waveney.gov.uk/newlocalplan). Once the methodology has been finalised work on assessing sites will begin. All sites will be consulted on as part of the consultation on the emerging Waveney Local Plan in early 2016.



## Appendix A – Suitability Assessment Criteria

### Constraints

Access to site		
<p><b>Red</b></p> <p>There is no possibility of creating access to the site.</p>	<p><b>Amber</b></p> <p>There are potential access constraints on the site, but these could be addressed through development.</p>	<p><b>Green</b></p> <p>Access by all means is possible.</p>

Access is an important consideration in determining the suitability of sites for development. Access is needed for both the construction, and occupation phases of a development. .

A site with no access or without the potential to provide suitable access cannot be considered suitable for development. The Highway Authority will be consulted to understand the access implications for sites.

Utilities Capacity		
<p><b>Red</b></p> <p>No available utilities capacity and no potential for improvements.</p>	<p><b>Amber</b></p> <p>No available utilities capacity but potential for improvements.</p>	<p><b>Green</b></p> <p>Sufficient utilities capacity available.</p>

The capacity of utilities including electricity, gas, and water supply together with the wastewater network and treatment facilities is critical to the development of a site. Utility providers will be consulted to understand whether there are any capacity issues affecting sites.

Utilities Infrastructure		
<p><b>Red</b></p> <p>n/a</p>	<p><b>Amber</b></p> <p>Utilities infrastructure present on the site that could affect development potential.</p>	<p><b>Green</b></p> <p>No constraints from utilities infrastructure</p>

Some sites may have strategic utilities infrastructure passing across it such as power lines and gas pipelines. Whilst this does not provide an absolute constraint to development it may limit the development potential of the site or involve additional costs which may affect the viability of the site.

Contamination		
<b>Red</b> n/a	<b>Amber</b> The site is potentially contaminated.	<b>Green</b> The site is unlikely to be contaminated.

Many potential sites across the District suffer from levels of contamination, such as sites on former or existing industrial and commercial land. Some greenfield sites may also be contaminated due to previous ground works and infilling. Land affected by contamination must be satisfactorily reduced to an acceptable level if it is proposed to be developed. Contamination is unlikely to provide an absolute constraint to development, however, where sites are contaminated the costs of development could increase which could affect the viability of the site. Existing information will be used to identify sites that are potentially, or known to be contaminated. The Council’s Environmental Protection team will also be consulted.

Flood Risk		
<b>Red</b> n/a	<b>Amber</b> The site is within flood zone 2 or flood zone 3a (taking into account climate change) and/or is within an area at high, medium or low risk from surface water flooding.	<b>Green</b> The site is not at risk from any flooding

Flood zones are defined by the Environment Agency and are present on the Environment Agency’s flood map. Flood Zone 1 represents an area with less than a 0.1% chance of flooding (a 1 in 1000 year flood event). Flood Zone 2 and Flood Zone 3a represent areas with greater than a 0.1% and a 1% chance of flooding respectively (1 in 1000 year and 1 in 100 year flood event).

The Environment Agency Flood Zones only show flood risk as of the situation today. However, when planning for new development the risk over the lifetime of development needs to be considered taking into account the effects of climate change. The Council’s Strategic Flood Risk Assessment identifies flood zones based on the lifetime of the development in certain area. Where this information is available these flood zones will be used for the purpose of this assessment. The flood zones described above relate to fluvial and tidal flooding (flooding from rivers and the sea).

Surface water flooding can also be an issue. The Environment Agency has published a surface water flood map for England which identifies areas of high, medium and low and very low surface water flood risk together with information on velocity and depth. A low risk surface flooding event has a similar likelihood of occurring as flood zone 2 event of between 0.1% and 1% chance.

Where sites are at risk from flooding their suitability will be based on the sequential test and exceptions test together with the potential for mitigation.<sup>5</sup>

### Coastal Erosion

Red	Amber	Green
The site is for residential use and within the Coastal Change Management Area.	The site for non-residential use and within the Coastal Change Management Area or for any use and located within 30m of a Coastal Change Management Area.	The site is not within 30m of a Coastal Change Management Area.

The Coastal Change Management Area as defined by existing Policy DM06 of the Development Management Policies DPD indicates the area forecasted to be affected by coastal erosion in the period to 2105 as established by the two Shoreline Management Plans covering the Waveney coastline. Within this area it is unlikely that permanent residential development will be suitable. However, some non-residential development may be appropriate where it supports local communities. Due to the uncertainty of the rate and extent of erosion any development within 30m of the Coastal Change Management Area requires a coastal erosion vulnerability assessment, the findings of which could restrict the development potential.<sup>6</sup>

### Market Attractiveness

Red	Amber	Green
The site is in a location not considered to be attractive to the market, and cannot be made so through development.	Through development the site may become attractive to the market.	The site is in a location considered to be attractive to the market.

Market attractiveness within this assessment will be based on the evidence found within the Strategic Housing Needs Assessment, The Employment Land Needs Assessment and the Retail and Leisure Needs Assessment.

<sup>5</sup> See paras. 100-104 of the National Planning Policy Framework.

<sup>6</sup> Also see para. 107 of the National Planning Policy Framework

*Potential Impacts*

Landscape/Townscape		
<p style="text-align: center;"><b>Red</b></p> <p>Development of the site would have a detrimental impact on sensitive landscapes or a significant impact on the townscape which cannot be mitigated.<sup>7</sup></p>	<p style="text-align: center;"><b>Amber</b></p> <p>Development of the site would have a detrimental impact on the landscape/townscape or a detrimental impact on a sensitive landscape which could be mitigated.</p>	<p style="text-align: center;"><b>Green</b></p> <p>Development of the site would not have an impact on the landscape.</p>

Sensitive landscapes include those within and adjacent to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and those landscape character areas identified as particularly sensitive in the Waveney Landscape Character Assessment which include Rural River Valleys and Tributary Valley Farmland. This includes land adjacent to the Broads National Park.

Other considerations include potential loss of protected trees on the amenity of the area.

Biodiversity and Geodiversity		
<p style="text-align: center;"><b>Red</b></p> <p>Development of the site would have a detrimental impact on designated sites, protected species or ecological networks which cannot be mitigated or compensated as appropriate</p>	<p style="text-align: center;"><b>Amber</b></p> <p>Development of the site may have a detrimental impact on a designated sites, protected species or ecological networks but the impact could be mitigated or compensated.</p>	<p style="text-align: center;"><b>Green</b></p> <p>Development of the site would not have an impact on any designated sites, protected species or ecological networks.</p>

Designated sites include:

- Special Areas of Conservation (including possible Special Areas of Conservation)
- Special Protection Areas (including potential Special Protection Areas)
- Ramsar sites (including proposed Ramsar sites)
- Sites of Specific Scientific Interest
- National Nature Reserves
- Ancient Woodland
- Regionally Important Geological Sites
- Local Nature Reserves
- County Wildlife Sites
- Roadside Nature Reserves

Sites directly within the top 6 designations will have already been excluded from the assessment. However, other sites in close proximity or with links to these sites may still result in a detrimental impact which cannot be mitigated and therefore need to be classified as a red impact. Where mitigation is possible, these sites could be assessed as an amber impact. Compensatory provision is not an option for the top three designations as compensatory measures are only appropriate where an overriding national need for

<sup>7</sup> See para 116 of the National Planning Policy Framework.



development has been demonstrated.

Sites which could have a detrimental impact on the other designated sites listed above will be regarded as a red impact if mitigation or compensatory provision cannot be provided. Where mitigation or compensatory provision can be provided sites will be assessed as having an amber impact.<sup>8</sup>

Natural England, Suffolk County Council and Suffolk Wildlife Trust will be consulted on sites to test their suitability against impacts on biodiversity and geodiversity.

### Historic Environment

Red	Amber	Green
Development of the site would cause substantial harm to a designated heritage asset or the setting of a designated heritage asset which cannot be mitigated. <sup>9</sup>	Development of the site could have a detrimental impact on a heritage asset or the setting of a heritage asset, but the impact could be mitigated.	Development of the site would not have an impact on any heritage assets

Heritage Assets are buildings, monuments, sites and places identified as having a degree of significance meriting consideration in planning decisions because their heritage interest.

Designated Heritage Assets in Waveney include:

- Listed Buildings (grade I, grade II\* and grade II)
- Registered Parks and Gardens
- Schedule Ancient Monuments
- Conservation Areas

Non designated heritage assets include locally listed buildings, and sites with archaeological potential.<sup>10</sup>

Historic England, Suffolk County Council and the Council’s Conservation Officer will be consulted on sites to test their suitability against impacts on the historic environment.

### Open Space

Red	Amber	Green
Development of the site would result in a loss of open space which is either not surplus to requirements or could not be replaced locally.	Development of the site would result in a loss of open space which is surplus to requirements or could be replaced locally.	Development of the site would not result in the loss of open space.

Open space includes play space, amenity space, playing fields, sports pitches, sports facilities, semi-natural space, parks and green corridors.

<sup>8</sup> See paras. 117-119 of the National Planning Policy Framework

<sup>9</sup> See paras 132,133 of the National Planning Policy Framework

<sup>10</sup> See para. 134 of the National Planning Policy Framework

Sites for development on open spaces will only be suitable if the open space is surplus to requirements or the open space can be replaced by a better or equivalent open space in terms of size and quality<sup>11</sup>.

### Transport and Roads

Red	Amber	Green
Development of the site would have an unacceptable impact on the functioning of trunk roads and local roads that cannot be mitigated.	Any potential impact on the functioning of trunk roads and local roads could be mitigated	Development of the site will not have a detrimental impact on the functioning of local roads and trunk roads.

The Highway Authority and Highways England will be consulted to ascertain any potential impacts on the functioning of trunk roads and local roads. In assessing impacts, consideration will be given to the following:

- Accessibility to public transport and key services and facilities and employment opportunities for sites being considered for residential use
- Accessibility to public transport and housing and other facilities for sites being considered for non-residential use
- Development potential and associated traffic generation
- Existing traffics conditions and capacity of local junctions.

### Compatibility with Neighbouring Uses

Red	Amber	Green
Neighbouring uses to the proposed site would be incompatible with the proposed development type with no scope for mitigation.	Development of the site could have issues of compatibility with neighbouring uses, however, these could be mitigated.	Development would be compatible with existing and/or adjoining uses.

New development should be compatible with its surrounding land uses. If existing neighbouring land uses or potentially future land uses (i.e. from other neighbouring sites being considered in the assessment) would create amenity issues for current or future residents or occupiers such as noise, odour or light pollution which cannot be mitigated then the site should be considered unsuitable for development. Sensitive design may lessen the impact of amenity issues and in some cases may still allow a site to be used for a conflicting use.

<sup>11</sup> See para. 74 of the National Planning Policy Framework.

<b>Contribution to Regeneration</b>		
<b>Red</b> Development of the site for the proposed use would undermine the regeneration of the area.	<b>Amber</b> n/a	<b>Green</b> Development of the site for the proposed use would not undermine the regeneration of the area.
The development of some sites for certain proposed uses could undermine the regeneration of the area. Examples could include the sites which result in the loss of viable services or employments uses, or sites proposed for uses which do not make the best use of opportunities presented by that site.		