

# Norfolk | Housing and Economic Land Availability Assessment (HELAA)

## Methodology

Final - July 2016

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### Document Control

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## 1 Introduction

- 1.1 The purpose of this assessment is to provide information on the range and extent of land which could be considered for development to meet the objectively assessed needs identified for housing and economic development in Norfolk across the period 2016-2036. It provides each Local Planning Authority with an audit of land regardless of the amount of development needed to meet identified need. Economic development includes business uses commonly found in purpose built employment areas such as office, industry, and warehousing as well as 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. The Central Norfolk Strategic Housing Market Assessment (CN SHMA) (2015), covering the local planning authority areas of Breckland, Broadland, the Broads, North Norfolk, Norwich and South Norfolk, was published in January 2016. The remainder of Norfolk is covered by two separate SHMAs prepared for the Borough of Kings Lynn and West Norfolk (published June 2014; supplemented by a review of objectively assessed housing need in May 2015) and Great Yarmouth Borough (published November 2013). The SHMAs for these two authorities both cover shorter time horizons than the CN SHMA: their respective end dates being 2028 and 2029. It is intended to review both to align them with the CN SHMA.
- 1.2 Other assessments and evidence studies to determine the needs for employment and other uses are currently in preparation or programmed. It is likely these assessments will be refined throughout the plan making process.
- 1.3 The Housing and Economic Land Availability Assessment (HELAA) is a key evidence document which supports the preparation of Local Plans. Its purpose is to test whether there is sufficient land to meet objectively assessed need (OAN) and identifies where this land may be located. The HELAA represents just one part of wider evidence and should not be considered in isolation of other evidence. This approach is supported by the national PPG which states that “...*The assessment is an important evidence source to inform plan making **but does not in itself determine whether a site should be allocated for development.** This is because not all sites considered in the assessment will be suitable for development (e.g. because of policy constraints or if they are unviable). It is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan (emerging Local Plans) themselves to determine which of those sites are the most suitable to meet those needs* - PPG Reference ID: 3-003-20140306

**Important:** a Housing and Economic Land Availability Assessment does not allocate land for development. That is the role of the Local Plan. The assessment does not determine whether a site should be allocated or given planning permission for development. The inclusion of a site as ‘suitable’ in the assessment does not imply or guarantee that it will be allocated, nor that planning permission would be granted should an application be submitted for consideration.

Including a suitable site with identified development potential within a HELAA document does NOT confer any planning status on the site, but means only that it will be considered as part of local plan production for potential development in the future and, where relevant, for potential inclusion on a statutory Brownfield Sites Register. No firm commitment to bring a site forward for development (either by the commissioning local planning authorities or other parties) is intended, or should be inferred, from its inclusion in a HELAA.

- 1.4 This document explains the intended common approach to undertaking Housing and Economic Land Availability Assessments in Norfolk.
- 1.5 This HELAA methodology has been agreed by each of the commissioning Local Planning Authorities (LPAs)<sup>1</sup> in line with the Duty to Cooperate and in recognition of the functional housing market and economic market areas and the cross-boundary movement in the markets. **A consistent methodology** across the Norfolk area is considered beneficial and will ensure each LPA prepares its HELAA in a consistent way. This will ensure that each of the individual LPAs understand the level of growth that can be planned for and the areas of each District where the growth could be accommodated. At a more detailed level it will also help the LPAs choose the best individual sites to allocate in Local Plans to meet the growth planned.
- 1.6 The HELAA methodology will apply to the local planning authority areas of:
- Breckland Council;
  - Broadland District Council;
  - Broads Authority<sup>2</sup>;
  - Great Yarmouth Borough Council;
  - Borough Council of King's Lynn and West Norfolk;
  - North Norfolk District Council;
  - Norwich City Council; and,
  - South Norfolk Council.
- 1.7 To support its emerging local plan, the Broads Authority will undertake a HELAA in accordance with this methodology if, in due course, it is deemed necessary (given that the policies of the National Planning Policy Framework (NPPF) indicate that development should be restricted in the Broads). A decision will be made following the conclusion of the Broads Authority's Issues and Options consultation in spring 2016.
- 1.8 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 (dated 27 March 2015).

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<sup>1</sup> Commissioning Local Planning Authorities (LPAs) are: Breckland District Council, Broadland District Council, Broads Authority, Great Yarmouth Borough Council, Borough Council of King's Lynn and West Norfolk, North Norfolk District Council, Norwich City Council, and South Norfolk District Council.

<sup>2</sup> The Broads Authority area includes a small part of Suffolk. Any sites submitted within that area will be assessed using this methodology which is consistent with that used by Waveney District Council.

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 and informed by key stakeholders' views on the approach to be used to assessing the amount land available for development in the area.

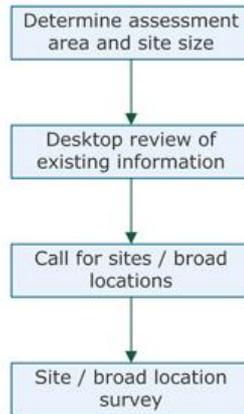
- 1.9 The Consultation for the HELAA methodology was undertaken across the seven districts and the Broads Authority between 21 March and 3<sup>rd</sup> May 2016. In total 25 responses were made with approximately 110 individual comments from developers, landowners and landowners' agents, specific consultees such as Norfolk County Council & Anglian Water and members of the public. The methodology was broadly supported with most comments seeking greater clarity and context. Where relevant the methodology has been updated to reflect these comments and provide greater clarity by officers through the Norfolk Duty to Cooperate Framework. A Schedule of Comments has also been prepared to accompany the development of this methodology.

## 2 Methodology

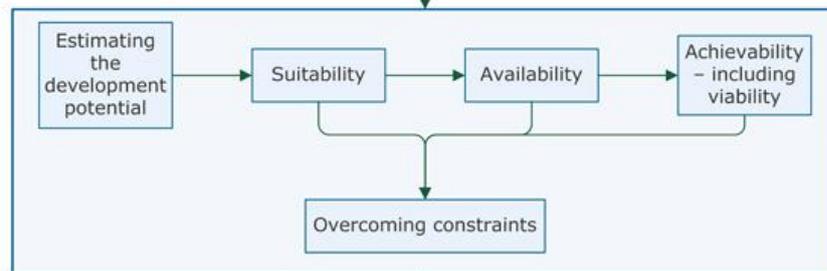
2.1 The assessment will consist of five stages which are discussed below. These stages are based on those set out in the National Planning Practice Guidance. The flow chart shown in [Figure 2.1](#) below summarises the methodology.

*Figure 2.1: National Planning Practice Guidance Housing and Economic Land Availability Assessment Methodology Flow Chart (Para ID 3-006-20140306)*

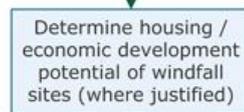
**Stage 1 - Site / broad location identification**



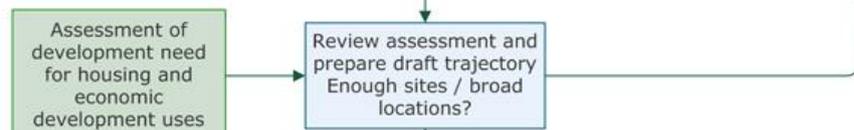
**Stage 2 - Site / broad location assessment**



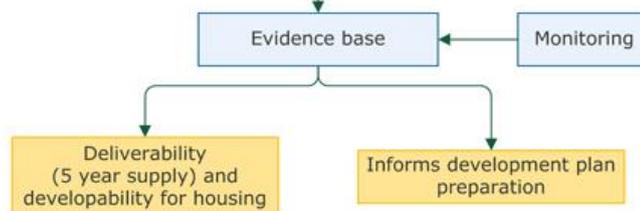
**Stage 3 - Windfall assessment**



**Stage 4 - Assessment review**



**Stage 5 - Final evidence base**



## Stage 1: Identification of sites and broad locations

2.2 The assessment aims to identify the amount of land available for housing and economic development in order that a capacity assessment can be made of suitable land. Sites will be identified from numerous sources detailed below:

- Sites with planning permission for housing or economic uses which are unimplemented or under construction;
- Sites allocated in existing Local Plans or Local Development Frameworks for housing or economic development which are unimplemented;
- Sites where previous planning applications have been refused or withdrawn;
- Land in local authority/Broads Authority ownership and other public sector land that can be identified
- Vacant, derelict and underused land identified from maps and local knowledge;
- Land and premises for sale, and;
- Through a Call for Sites (see below);
- Review of previous studies such as any previous relevant Strategic Housing Land Availability Assessments , ( SHLAA)

2.3 At an early stage in preparing emerging Local Plans, each local planning authority will need to carry out a Call for Sites. North Norfolk District Council issued their Call For Sites in January 2016 and a Call For Sites for the emerging Greater Norwich Local Plan for Broadland, Norwich and South Norfolk ran from April to July 2016 . Breckland Council carried out a Call For Sites in 2015. The aim of the Call for Sites is to encourage landowners, developers and others to let the Local Planning Authorities , LPA's know about available and potentially available sites in their respective areas. The LPAs are interested to know the availability of all types of sites in all potential locations. These include previously developed sites, undeveloped greenfield land and land in and around towns and villages. More information about the call for sites can be found in the Planning Practice Guidance at:

<http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/methodologystage-1-identification-of-sites-and-broad-locations-determine-assessment-area-and-site-size/>.

2.4 The national PPG states that *."Plan makers will need to assess a range of different site sizes from small-scale sites to opportunities for large-scale developments such as village and town extensions and new settlements where appropriate. The assessment should consider all sites and broad locations capable of delivering five or more dwellings or economic development on sites of 0.25ha (or 500m<sup>2</sup> of floor space) and above. Where appropriate, plan makers may wish to consider alternative site size thresholds"* The assessment will focus on sites which:

- a) Are capable of delivering **5 or more dwellings, or are at least 0.25 hectares in size and which are located:**
- within or immediately adjacent to development boundaries of settlements identified for larger scale growth within adopted Local Plans and/or settlement hierarchies;

- within the local planning authority area of Norwich City Council;
- within the local planning authority area of King's Lynn and West Norfolk Borough Council; and,
- within the local planning authority area of Great Yarmouth Borough Council.

b) Are capable of delivering **10 or more dwellings, or are at least 0.25 hectares in size and which are located outside of the areas specified in a).**

It is not the purpose of the HELAA to identify what locations are “sustainable”, this will be through the Local Plan process. As such, all settlements will be included within the HELAA as above. If it is shown that a local planning authority cannot identify sufficient capacity to meet its own OAN based on the identified thresholds above then in the first instance the size threshold and other assumptions should be revisited.

2.5 The Broads Authority will not set a minimum site size or number of dwellings as: historically the majority of sites that have come forward are small in size and number of dwellings, typically up to five dwellings; the Broads' OAN is relatively low and small sites will make a significant contribution to meet this; and, a large proportion of the Authority's area is within sites identified in paragraph 2.7 below as areas which should be excluded from assessment. Setting a threshold may therefore result in insufficient sites coming forward to meet need.

2.6 This threshold does not apply to sites with planning permission for development. The contribution from these sites, regardless of size, will be counted towards the land availability of the local planning authority area (or other defined cross-boundary area where a larger area is used for the purposes of calculating a five year land supply).

2.7 All sites (apart from sites with planning permission) will be subject to an initial 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/or legislation. The national PPG makes it clear that a site's exclusion from the HELAA process during the desktop review will only occur where no feasible development potential can be demonstrated due to the presence of overwhelming constraints for the foreseeable future. Sites which are only partially affected may still be considered depending on the extent and impact of the associated constraint. In these cases the Council may reduce the size of the site to be considered for its developability. This does not mean that excluded HELAA sites cannot go forward and be considered as part of a more detailed site allocation assessment in any emerging Local Plan and be subject to Sustainability Appraisal and other sources of evidence. Sites will be automatically excluded from further capacity assessment in this HELAA where they are:

- within Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites (including potential SPAs, possible SACs, and proposed Ramsar sites) or 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;

- within Flood Zone 3b<sup>3</sup>;
- within the area of Scheduled Ancient Monuments or Ancient woodlands ;
- on Statutory Allotments, and/or
- within Locally Designated Green Spaces, including Designated Village Greens and Common Land;
- at risk from coastal erosion.

## Stage 2: Site Assessment

2.8 The purpose of this stage is to determine whether sites are deliverable or developable<sup>4</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.

2.9 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 five years.

2.10 The assessment will be based on the information gathered through the desktop review and through focused site visits.

## Estimating Development Potential

2.11 The way the development potential will be worked out will vary 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 uses granted planning permission has been used to establish the amount of development yielded from the site.

### *Development Potential for Housing*

2.12 The indicative development potential for housing will be calculated using a mixed methods approach . As advised in the national PPG the starting point for numbers will be based on locally determined existing policies set out in each authority's adopted local plan. [Figure 2.2](#) sets out the relevant policies in detail.

*Figure 2.2 Density policies for each local planning authority.*

<sup>3</sup> Flood zones are defined by the Environment Agency. 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 in any 12-month period (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>4</sup> See Footnote 11 of the national Planning Policy Framework

LPA area	Policy reference	Density Requirement (dwellings per hectare (dph))
Breckland Council	Core Strategy (DC2)  SHLAA multiplier	40dph town centres, areas with good public transport and sustainable urban extensions. 22-30dph rural areas etc.  Town centre – 50 Edge of centre – 45 Edge of town – 35 Out of town (urban extensions) – 30 Local service centres – 25
Broadland District Council	N/a	25dph
Broads Authority	N/a	To be assessed on a site by site basis, taking account of the site and its setting.
Great Yarmouth Borough Council	N/a	Out of Town – 30dph Edge of Town – 40dph Edge of Centre – 50dph Town Centre – 65dph
Borough Council of King’s Lynn and West Norfolk	N/a	King’s Lynn (sub-regional centre): 39dph  Downham Market/Hunstanton/Wisbech (main town): 36dph  Key rural service centres and rural villages: 24dph  Assumed net developable site area (ndsa) compared to site area: <ul style="list-style-type: none"> <li>• Less than 0.4ha: 100%ndsa</li> <li>• 0.4ha to 2ha: 90%ndsa</li> <li>• Sites over 2ha: 75%ndsa</li> </ul>
North Norfolk District Council	HO7	Principal and Secondary Settlements (excluding Hoveton): not less than 40dph.  Service Villages, Coastal Service Villages and Hoveton: not less than 30dph.
Norwich City Council	DM12	Not less than 40 dph other than exceptionally where character and context requires a lower density approach. Higher densities encouraged in defined centres.
South Norfolk Council		25dph

2.13 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, historic planning applications<sup>5</sup> or masterplans submitted

<sup>5</sup> The existence of a historic planning application and/or permission for a specific form and density of development on a site does not imply that the site is necessarily still capable of accommodating the same number of dwellings or floorspace. This is particularly relevant where more recent objective evidence (for example, elevated flood risk) or a significant national policy constraint (for example, newly recognised major environmental or heritage significance) suggest that development should be restricted.

through the 'call for sites' process.

- 2.14 The individual characteristics of a site will also be taken into account including the surrounding residential density and character including impact on the setting of heritage assets. Where appropriate the development potential of the site will be adjusted accordingly. Consideration will also be given to the effects of site shape and topography on development potential.
- 2.15 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*

- 2.16 Potential for development for employment purposes will need to take account of evidence from a range of sources. There is currently no single employment land needs assessment which covers Norfolk as a whole, nor is it intended to undertake one, since the widely differing characteristics of different areas of the county make a "one size fits all" approach for a very large study area difficult to achieve. Rather, the commissioning local planning authorities will use the most up to date evidence of economic and demographic trends (including the East of England Forecasting Model) together with relevant existing and emerging studies being taken forward for their respective LPA areas and for established strategic planning partnership areas such as greater Norwich. It will also be important at each stage to take account of the latest economic and market intelligence and to draw on relevant evidence from the Local Enterprise Partnership and other stakeholders of changing employment needs and requirements. The approach to evidence gathering is still being determined and will be refined through the Local Plan process.
- 2.17 Employment trends and employment growth forecasts will be used to determine the overall range of need for jobs and floorspace, which in turn will need to be translated into land area (in hectares) required to accommodate that floorspace using agreed plot ratios for different types of development. The development potential of a site will be dependent on whether there are any constraints on a site which would render parts of the site undevelopable (for example an irregularly 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 may be denser than the average plot ratios identified in existing and emerging needs assessments.

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

- 2.18 Historically, local evidence studies for town centre uses have focused to a large extent on retailing, since shopping tends to be the predominant activity in centres and there are commonly accepted methodologies and best practice for calculating retail floorspace need and capacity based on forecast growth and spending patterns in different retail sectors. The potential for town centres to accommodate other uses has been established in different ways according to the use involved (for example a percentage of identified retail floorspace capacity might be “top sliced” to derive a notional floorspace requirement for cafés and restaurants). As is the case with employment development, the local approach to evidence gathering for the HELAA in relation to town centre uses is still to be determined but will need to draw on a relevant evidence base, including specific studies undertaken for individual local planning authority areas, county wide studies such as the Norfolk Market Towns Survey and updated retail evidence to be commissioned for the greater Norwich area. Due to the wide ranging differences in types of use and formats that may fall within the scope of “town centre uses”, the development potential of sites will need to be assessed on a site by site basis considering the possible uses that might be accommodated and the form and character of surrounding development.

### Assessment of Suitability

- 2.19 The suitability of a site is influenced by national planning policy, local planning policy (where policy is up to date and consistent with the NPPF) 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 and the impacts on amenity and environment of neighbouring areas.
- 2.20 To assess the suitability of sites a ‘red’, ‘amber’ ‘green’ (RAG) approach will be applied to assessing the various types of constraints and potential 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.
- 2.21 ‘Red’ impacts and constraints rule out the suitability of a site at this stage as part of the HELAA in any calculation of suitable land capacity. Any site assessed as ‘red’ against any type of constraint or impact will be discounted from the assessment and the site will not be considered suitable for development in this HELAA capacity assessment. This does not mean that those sites identified as unsuitable at this stage and excluded from the HELAA capacity assessment cannot go forward and be considered as part of a more detailed site allocation assessment in any emerging Local Plan and be subject to Sustainability Appraisal. As noted in the national PPG the HELAA is an important evidence source to inform plan making but does not in itself determine whether a site should be allocated for development.

- 2.22 'Amber' impacts and constraints will not immediately rule out the suitability of development of a site. However, some mitigation will be required in order for the site to be suitable and the feasibility and extent of that mitigation will need to be identified through further research. In many cases it will only be possible to make a broad assessment as to how a site could be developed, as there will be no detailed proposals against which to assess likely impacts and how they could be mitigated. In order to make an assessment of potential capacity for HELAA purposes, officers will use their planning judgement and experience to assess the potential impacts, and how (if at all) they could be mitigated, based on the best evidence available. Therefore, sites assessed as 'amber' against any type of constraint or impact will be considered potentially suitable providing that constraints could be overcome, (based on officers' judgement), but would almost inevitably require a more detailed assessment before they could be confirmed as suitable for Local Plan allocation. Further detail on the potential mitigation will be included on the site assessment form.
- 2.23 The 'green' category represents no constraint or impact with respect to that type of impact or constraint.
- 2.24 The types of constraint and impact listed on the next page will be considered in terms of assessing suitability.

*Constraints:*

- Access to site
- Access to local services and facilities
- Utilities capacity
- Utilities infrastructure
- Contamination
- Flood risk
- Coastal change
- Market attractiveness

*Impacts:*

- Landscape/townscape
- Biodiversity and geodiversity
- Historic environment
- Open Space
- Transport and roads
- Compatibility with neighbouring uses

The above criteria are just one element of the assessment for the HELAA. In addition to establishing whether sites are potentially suitable for development, sites also need to be assessed in terms of whether they are 'available' for development and whether they are 'achievable'.

- 2.25 Further details on how the LPAs will assess the suitability against each of the above constraints and impacts are included in Appendix A. In assessing the suitability of sites, account will be taken of standing advice from statutory undertakers and infrastructure

providers with regard to maintaining appropriate separation between new development and existing infrastructure installations, early consultation with appropriate stakeholders will be undertaken where necessary.

### Assessment of Availability

- 2.26 A site will normally be considered *available*, based on the best information 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 process, but also through targeted consultation with developers and landowners of identified sites.
- 2.27 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

- 2.28 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.
- 2.29 Evidence from previous viability studies conducted in the local planning authority areas may be used to assess the high level viability of sites for both residential and non-residential development, dependent on the currency and robustness of the data involved. Viability evidence from emerging local plans may be used to inform this process.
- 2.30 To help assess the viability of sites, information will be sought from landowners and developers through the call for sites process. All suitable and available sites will be assessed for viability in a 'Whole Plan Viability' assessment which will be conducted as part of the emerging Local Plans.
- 2.31 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

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

## Sites to be taken forward

2.33 In order to be included in the HELAA capacity assessment, sites will be expected to achieve either an **amber** or **green** rating against all suitability criteria, and to meet the availability and achievability tests of stage 2.

2.34 As noted in section 1, **inclusion of a site in the HELAA does not allocate the site, nor does it mean that planning permission would be granted**, nor does it explicitly exclude sites from further assessment in the Local Plan process, should such a site be put forward. It shows only that there is an identified potential capacity to meet objectively assessed need.

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

2.35 Windfall sites are sites which have not been specifically identified as part of the Local Plan process. The term covers sites that have unexpectedly become available, ranging from large sites (for example resulting from a factory closure) to small sites such as a residential conversion or a new flat over a shop. The majority of windfall sites will be previously developed but they may also come forward through, for example, the release of small rural exception sites for affordable housing.

2.36 Windfall sites for housing and economic development have provided an important source of development across all the local planning authority areas in the past and are expected to continue to contribute to the supply to a varying extent in future. In some areas opportunities to promote and allocate large scale development sites are heavily constrained by local and national environmental designations, (in particular the Broads), consequently the proportion of development that may need to be delivered from windfall sites in that area may be relatively high.

2.37 To assess the windfall potential of both housing and economic development, past trends will be analysed and evidence based judgements made to inform projected future supply.

2.38 The National Planning Policy Framework prohibits the inclusion of development on residential garden land from windfall allowances therefore trend data from development on garden land will normally be excluded from the analysis. A recent high court ruling<sup>6</sup> has determined that the definition of “garden land” as greenfield land in this context should only extend to garden

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<sup>6</sup> Dartford Borough Council v Secretary of State for Communities & Local Government (CO/4129/2015); 21 January 2016.

land in built-up areas. Consequently it may be necessary to assess whether any development on garden land elsewhere should be included as part of the windfall trend analysis.

- 2.39 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.
- 2.40 It is necessary to consider as part of this analysis whether windfall delivery rates will change and if so, how. It is commonly argued that because land is a finite resource, windfall sites will inevitably reduce as a source of housing supply. However, the redevelopment and renewal of previously developed land is a continuous process, and offers many opportunities to accommodate housing and other development at increased densities on sites which were previously developed in a different form (intensification).
- 2.41 In addition, the government's extension of permitted development rights since 2013 to allow easier conversion of offices, agricultural buildings and other commercial premises to housing has significantly increased the contribution to the housing supply of windfall sites involving such conversions, especially in Norwich. The effect of ongoing planning deregulation, means that at least in the short term there may be more windfall development, not less. The impact of these regulatory reforms, the contribution of other newly emerging windfall sites and the potential uplift in delivery from higher density development (through, for example, area-wide estate renewal) all need to be reflected when calculating the future potential of windfall.
- 2.42 Many existing planning permissions which will be built out over the next few years are on windfall sites and therefore when projecting windfall trends forward it is important not to double count their contribution.

#### Stage 4: Review

- 2.43 The total capacity of land for each use will be calculated and compared against the objectively assessed need (OAN) for housing and employment. Each local planning authority must then make a judgement as to whether its housing and employment requirements can be accommodated using the sites identified as available. If housing or employment arising in a local planning authority area cannot be met fully within that area, a process of reappraisal must begin. Land previously discounted, perhaps because of a particular policy constraint, might be reintroduced. A reassessment of the development potential of already identified sites to see if the development potential could be increased (for example through higher densities) could also be undertaken. The point is that a reappraisal of constraints is part of the methodology and that modifying policy constraints could be a means to ensure enough land is made available for development. Timing could be another factor, as some land might be tied into a particular use in the short-term, or face a longer lead-in time whilst essential

infrastructure is provided. A combination of sites that are deliverable in the short-term, as well as offering a longer-term pipeline of sites, is important.

- 2.44 If a local planning authority cannot identify sufficient capacity to meet its own OAN, then in the first instance consideration should be given to the need to revisit the assessment undertaking a finer grained assessment based on changed assumptions as above. If, following this there is still insufficient sites then it will be necessary to investigate how this shortfall can be planned for and undertake discussions under the Duty to Cooperate to assess if there is sufficient capacity in neighbouring areas to accommodate additional growth.

### Stage 5: Finalising the HELAA

- 2.45 Planning Policy Guidance is clear that the HELAA should contain certain standard outputs.

These are:

- a list of all site or broad locations considered, cross-referenced to their locations on maps;
- an assessment of each site or broad location, in terms of its suitability for development, availability and achievability including whether the site/broad location is viable to determine whether a site is realistically expected to be developed and when;
- more detail for those sites which are considered to be realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons;
- the potential type and quantity of development that could be delivered on each site/broad location, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when; and,
- an indicative trajectory or anticipated development and consideration of associated risks.

- 2.46 Each HELAA to be prepared under this methodology will be expected to meet these criteria. The final HELAA report for each local planning authority (or wider area) will be a key piece of evidence to be used when preparing Local Plans. Choices about allocations for housing and employment land will be weighed against what is found by the HELAA, plus other sources of evidence, and then a balanced assessment reached by consideration against local and national planning policies.

### 3 Next Steps

- 3.1 Assessment of sites will commence when the respective Call for Sites closes and in line with the respective local authorities time line. **All sites** in each LPA area will be consulted on as part of the consultations on the respective emerging Local Plan.

## Appendix A – Suitability Assessment Criteria

### Constraints

Access to Site		
<b>Red</b> No possibility of creating access to the site	<b>Amber</b> There are potential access constraints on the site, but these could be overcome through development	<b>Green</b> 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 construction and occupation phases of a development.</p> <p>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.</p>		
<i>Exceptions: None</i>		

Accessibility to local services and facilities		
<b>Red</b> No core services within 800m/10 minutes walking distance of the site in town centres, 1,200m elsewhere and 2,000m for school access and employment or no ability to provide/ fund appropriate new core services.	<b>Amber</b> One to three core services within 800m/10 minutes walking distance of the site in town centres, 1,200m elsewhere and 2,000m for school access and employment	<b>Green</b> Four or more core services within 800m/10 minutes walking distance of the site in town centres, 1,200m elsewhere and 2,000m for school access and employment
<p>Accessibility of a site to local services and facilities by means other than the car – and the extent to which development might provide new services or enhance sustainable accessibility to existing ones – are important considerations in determining the suitability of a site for development. They will also have a bearing on market attractiveness, for example the proximity of a site to local schools. The Institute of Highways and Transportation recommend a distance of 800m in town centres and 1,200m elsewhere.. The CIHT also recommends that 2,000m is an acceptable walking distance for school access and employment. Within the HMA and across the districts there are many different townscapes and streetscapes across urban and rural areas and this should be reflected in the assessment. In assessing sites against this measure, accessibility to the following core services will be considered:</p> <ul style="list-style-type: none"> <li>• A primary school,</li> <li>• A secondary school</li> <li>• A local healthcare service (doctors' surgery),</li> <li>• Retail and service provision for day to day needs (district/local shopping centre, village shop);</li> <li>• Local employment opportunities (principally existing employment sites, but designated or proposed employment area in a local plan will also be considered),</li> <li>• A peak-time public transport service to/from a higher order settlement (peak time for the purposes of this criterion will be 7-9am and 4-6pm).</li> </ul>		
<i>Exceptions: None</i>		

Utilities Capacity		
<b>Red</b> No available utilities capacity and no potential for improvements.	<b>Amber</b> No available utilities capacity but potential for improvements to facilitate capacity.	<b>Green</b> Sufficient utilities capacity available.
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 as part of this assessment to understand whether there are any capacity issues affecting sites.		
<i>Exceptions: None</i>		

Utilities Infrastructure		
<b>Red</b> N/a	<b>Amber</b> Utilities infrastructure present on the site that could affect the development potential.	<b>Green</b> No constraints from utilities infrastructure.
Some sites may have strategic utilities infrastructure passing across it (either under or over ground), for example, power lines, gas pipelines, water supply pipes, sewers or pumping stations. 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. As with the capacity criteria, utility providers will be consulted as part of this assessment to understand whether there are any existing infrastructure issues affecting sites.		
<i>Exceptions: None</i>		

Contamination and ground stability		
<b>Red</b> N/a	<b>Amber</b> The site is potentially contaminated or has potential ground stability issues that could be mitigated.	<b>Green</b> The site is unlikely to be contaminated and has no known ground stability issues.
Many potential sites across each district suffer from levels of contamination, such as sites on former or existing industrial and commercial land. Others are affected by ground stability issues such as historic mineral working, quarrying or tunnelling. Some greenfield sites may also be contaminated due to previous ground works and infilling. Where suspected contamination or ground stability issues are identified they must be satisfactorily mitigated before the site can be considered for development. Neither contamination nor ground stability issues are likely to present an insurmountable constraint to development. However, where sites are contaminated or on unstable land 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 or affected by ground stability. Each LPA's Environmental Protection team will be consulted.		
<i>Exceptions: None</i>		

Flood Risk		
<p><b>Red</b> The site is within the functional flood plain (Zone 3b)</p>	<p><b>Amber</b> The site is within flood zones 2 or 3a (taking into account climate change) and/or is within an area at high, medium or low risk from surface water flooding.</p>	<p><b>Green</b> The site is at low risk of flooding (within Zone 1).</p>
<p>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 events). The functional flood plain (Zone 3b) comprises land where water has to flow or be stored in times of flood.</p> <p>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. Each LPAs Strategic Flood Risk Assessment identifies flood zones based on the lifetime of the development in certain areas. 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).</p> <p>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, 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 events of between 0.1% and 1% chance.</p> <p>King's Lynn and West Norfolk Borough Council have defined a Coastal Flood Risk Hazard Zone between Hunstanton and Dersingham in policy DM18 of the emerging Site Allocations and Development Management Policies Document (see also Coastal Change below). This indicates the area forecast to be affected by tidal flooding in the plan period as established in the Strategic Flood Risk Assessment, if relevant. Within this zone it is unlikely that permanent residential development will be suitable. However, some non-residential development may be appropriate where it supports local communities.</p> <p>Whilst flooding may 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. 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>7</sup>.</p>		
<p><i>Exceptions: None</i></p>		

<sup>7</sup> See paragraphs 100-104 of the National Planning Policy Framework.

Coastal Change		
<b>Red</b> The site is for residential use and within the Coastal Change Management Area or Coastal Flood Hazard Zone.	<b>Amber</b> The site is for non-residential use and within the Coastal Change Management Area or Coastal Flood Hazard Zone or for any use and located adjacent to a Coastal Change Management Area or Coastal Flood Hazard Zone.	<b>Green</b> The site is not adjacent to a Coastal Change Management Area or Coastal Flood Hazard Zone.
<p>The Coastal Change Management Areas within Great Yarmouth Borough Council and North Norfolk District Council are identified in policies CS13 and EN11 in the respective Local Plans for those authorities. In addition, King’s Lynn and West Norfolk Borough Council have defined a Coastal Flood Risk Hazard Zone between Hunstanton and Dersingham in policy DM18 of the emerging Site Allocations and Development Management Policies Document (see above). Each of these policies indicates the area forecast to be affected by coastal erosion and/or tidal flooding in the plan period as established in the corresponding Shoreline Management Plans and Strategic Flood Risk Assessments, if relevant. Within these areas it is unlikely that permanent residential development will be suitable. However, some non-residential development may be appropriate where it supports local communities.<sup>8</sup></p>		
<p><i>Exceptions: In both the Broads Authority area and North Norfolk District Council’s area there are areas designated as ‘Undeveloped Coast’. Sites put forward in these locations will score a red against these criteria.</i></p>		

Market Attractiveness		
<b>Red</b> The site is in a location not considered to be attractive to the market, and cannot be made so through development.	<b>Amber</b> Through development the site may become attractive to the market.	<b>Green</b> The site is in a location considered to be attractive to the market.
<p>Market attractiveness within this assessment will be based on the evidence from a variety of sources and will need to take account of evidence within the Strategic Housing Market Assessment (SHMA) relevant emerging evidence in retail/economic needs assessments and from commercial market commentaries.</p>		
<p><i>Exceptions: None</i></p>		

## Impacts

Nationally and Locally Significant Landscapes		
<b>Red</b> Development of the site would have a detrimental impact on sensitive or other landscapes which cannot be mitigated. <sup>9</sup>	<b>Amber</b> Development of the site would have a detrimental impact on sensitive or other landscapes which could be mitigated.	<b>Green</b> Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact, on sensitive landscapes or their setting.
<p>Sensitive landscapes include</p> <ul style="list-style-type: none"> <li>• areas within and adjacent to National Parks, the Broads and Areas of Outstanding Natural</li> </ul>		

<sup>8</sup> See paragraph 107 of the National Planning Policy Framework.

<sup>9</sup> See paragraph 115/116 of the National Planning Policy Framework.

<p>Beauty , .</p> <p>They also include land within and adjacent to the Broads which has equivalent status to a National Park and benefits from the highest status of protection in relation to landscape and scenic beauty. Other considerations include the potential loss of protected trees on the amenity of the area and the impacts on the setting of the Norfolk Coast AONB</p> <p>Other landscapes include Strategic Gaps (or equivalent) and or areas identified as particularly sensitive in Landscape Character Assessments.</p> <p><i>Exceptions: None</i></p>
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Townscape		
<p><b>Red</b></p> <p>Development of the site would have a detrimental impact on townscapes which cannot be mitigated.<sup>10</sup></p>	<p><b>Amber</b></p> <p>Development of the site would have a detrimental impact on townscapes which could be mitigated.</p>	<p><b>Green</b></p> <p>Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact, on townscapes.</p>
<p>Sensitive townscapes include those areas within and adjacent to National Parks, the Broads and Areas of Outstanding Natural Beauty and include Conservation Areas where up to date appraisals have indicated a high level of townscape significance, where development may affect particular concentrations of listed or locally listed buildings with collective townscape value and any other areas identified as particularly sensitive in Local Plans, local townscape appraisals or historic character studies.</p> <p>Other considerations include the potential loss of protected trees on the amenity of the area.</p> <p><i>Exceptions: None</i></p>		

Biodiversity and Geodiversity		
<p><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 reasonably mitigated or compensated as appropriate.</p>	<p><b>Amber</b></p> <p>Development of the site may have a detrimental impact on a designated site, protected species or ecological network but the impact could be reasonably mitigated or compensated.</p>	<p><b>Green</b></p> <p>Development of the site would not have a detrimental impact on any designated site, protected species or ecological networks.</p>
<p>Designated sites are those with national or international protection, namely:</p> <ul style="list-style-type: none"> <li>• Special Areas of Conservation (including possible Special Areas of Conservation)</li> <li>• Special Protection Areas (including potential Special Protection Areas)</li> <li>• Ramsar sites (including proposed Ramsar sites)</li> <li>• Sites of Specific Scientific Interest</li> <li>• National Nature Reserves</li> <li>• Ancient Woodland</li> </ul> <p>and those with regional or local protection, namely:</p> <ul style="list-style-type: none"> <li>• Regionally Important Geological Sites</li> <li>• Local Nature Reserves</li> <li>• County Wildlife Sites</li> </ul>		

<sup>10</sup> See paragraph 116 of the National Planning Policy Framework.

- County Geodiversity Sites
- Roadside Nature Reserves
- Priority habitats, veteran trees, ecological networks;
- Priority and/or legally protected species populations.

Sites with national or international protection 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 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>11</sup>

Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP).

Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds).

Natural England, Norfolk County Council, Norfolk Wildlife Trust and in-house ecologists where possible will be consulted on sites to test their suitability against impacts on biodiversity and geodiversity.

*Exceptions: None*

Historic Environment		
<p><b>Red</b></p> <p>Development of the site would cause substantial harm to a designated or non-designated heritage asset or the setting of a designated or non-designated heritage asset which cannot be reasonably mitigated.<sup>12</sup></p>	<p><b>Amber</b></p> <p>Development of the site could have a detrimental impact on a designated or non-designated heritage asset or the setting of a designated or non-designated heritage asset, but the impact could be reasonably mitigated.</p>	<p><b>Green</b></p> <p>Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.</p>
<p>Heritage Assets are buildings, monuments, sites, landscapes and places identified as having a degree of significance meriting consideration in planning decisions because of their heritage interest. Designated heritage assets include:</p> <ul style="list-style-type: none"> <li>• Listed Buildings (grade I, grade II* and grade II)</li> <li>• Registered Parks and Gardens</li> <li>• Scheduled Ancient Monuments</li> <li>• Conservation Areas</li> </ul>		

<sup>11</sup> See paragraphs 117-119 of the National Planning Policy Framework.

<sup>12</sup> See paragraphs 132-133 of the National Planning Policy Framework & Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Non-designated Heritage Assets can include locally listed buildings, non-registered parks or gardens sites with archaeological potential and sites identified as having local heritage significance in the Norfolk Historic Environment Record (HER).<sup>13</sup>

Historic England, Norfolk County Council and each LPAs Conservation Officer will be consulted on sites to test their suitability against impacts on the historic environment.

*Exceptions: None*

Open Space / Green Infrastructure		
<b>Red</b> 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.	<b>Amber</b> Development of the site would result in a loss of open space which is surplus to requirements or could be replaced locally.	<b>Green</b> Development of the site would not result in the loss of any open space.
<p>Open space is any area of open space with public value. This includes play space, amenity space, playing fields, sports pitches, sports facilities, semi-natural space, parks, green corridors/infrastructure and land designated as Local Green Space. It also includes areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as visual amenity.</p> <p>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>14</sup></p>		
<i>Exceptions: None</i>		

Transport and Roads		
<b>Red</b> Development of the site would have an unacceptable impact on the functioning of trunk roads and/or local roads that cannot be reasonably mitigated.	<b>Amber</b> Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.	<b>Green</b> Development of the site will not have a detrimental impact on the functioning of trunk roads and/or local roads.
<p>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:</p> <ul style="list-style-type: none"> <li>• Accessibility to public transport and key services and facilities and employment opportunities for sites being considered for residential use;</li> <li>• Accessibility to public transport and housing and other facilities for sites being considered for non-residential use;</li> <li>• Development potential and associated traffic generation, and;</li> <li>• Existing traffic conditions and capacity of local junctions.</li> </ul>		
<i>Exceptions: None</i>		

<sup>13</sup> See paragraph 134 of the National Planning Policy Framework.

<sup>14</sup> See paragraph 74 of the National Planning Policy Framework.

<b>Compatibility with Neighbouring/Adjoining Uses</b>		
<b>Red</b> Neighbouring/adjoining uses to the proposed site would be incompatible with the proposed development type with no scope for mitigation.	<b>Amber</b> Development of the site could have issues of compatibility with neighbouring/adjoining uses; however, these could be reasonably mitigated.	<b>Green</b> Development would be compatible with existing and/or adjoining uses.
<p>New development should be compatible with its surrounding land uses and adjoin infrastructure. If existing neighbouring/adjoining land uses or potential 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.</p> <p>For sites adjacent to the Broads consideration will need to be given to the potential impact on the tranquillity of the Broads which is a special quality of the area.</p> <p>In assessing the suitability of sites, account will be taken of standing advice from statutory undertakers and infrastructure providers with regard to maintaining appropriate separation between new development and existing infrastructure installations.</p>		
<i>Exceptions: None</i>		

In order to give water recycling centres (formally referred to as Wastewater Treatment Plants) room to grow and enable them to operate efficiently Anglian Water recommend a suitable distance is maintained between them and the communities they serve. A 400m gap is recommended for a water recycling centre and within 15m of a used water pumping station.

## Appendix B – Site Assessment Form

<b>Site address:</b>	
<b>Current planning status</b> e.g. with permission, allocated, suggested through the Call for Sites etc.	
<b>Site Size (hectares)</b>	
<b>Greenfield / Brownfield</b>	
<b>Ownership (if known)</b> (private/public etc.)	
<b>Absolute Constraints Check</b>	
<b>Is the site in a ...</b>	
<b>SPA, SAC, SSSI or Ramsar</b>	
<b>National Nature Reserve</b>	
<b>Ancient Woodland</b>	
<b>Flood risk zone 3b</b>	
<b>Scheduled Ancient Monument</b>	
<b>Statutory Allotments</b>	
<b>Locally Designated Green Space</b>	
<b>At risk from Coastal Erosion</b>	
<i>If yes to any of the above, site will be excluded from further assessment.</i>	
<b>Development Potential</b> (number of dwellings, hectares of employment land or town centre use floorspace):	
<b>Density calculator</b>	

<b>Suitability Assessment</b>		
<b>Constraint</b>	<b>Score (red/amber/green)</b>	<b>Comments</b>
Access to site		
Accessibility to local services and facilities		
Utilities Capacity		
Utilities Infrastructure		
Contamination and ground stability		
Flood Risk		
Coastal Change		
Market Attractiveness		
<b>Impact</b>	<b>Score (red/amber/green)</b>	<b>Comments</b>
Nationally and Locally Significant Landscapes		
Townscape		
Biodiversity and Geodiversity		
Historic Environment		
Open Space		
Transport and Roads		
Compatibility with neighbouring/adjoining uses		
<b>Local Plan Designations (add further lines as required)</b>		
<b>Designation</b>	<b>Policy reference</b>	<b>Comments</b>
<b>Availability Assessment (will require liaison with landowners)</b>		
Is the site being marketed?		

Add any detail as necessary (e.g. where, by whom, how much for etc.)		
When might the site be available for development (tick as appropriate)	Immediately	
	Within 5 years	
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):		
Comments		
<b>Achievability (including viability)</b>		
Comments		
<b>Overcoming Constraints</b>		
Comments		
<b>Trajectory of development</b>		
Comments		
<b>Barriers to Delivery</b>		
Comments		
<b>Conclusion (e.g. is included in the theoretical capacity)</b>		

A Site Map will be included with each assessment form