

Borough Council of  
**King's Lynn &  
West Norfolk**



# **Local Plan Task Group**

## **Agenda**

**Wednesday, 18th January, 2017**  
at 10.00 am

in the

**Miles Room  
Town Hall  
Saturday Market Place  
King's Lynn**



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**King's Court, Chapel Street, King's Lynn, Norfolk, PE30 1EX**  
**Telephone: 01553 616200**  
**Fax: 01553 691663**

12 January 2017

Dear Member

**Local Plan Task Group**

You are invited to attend a meeting of the above-mentioned Panel which will be held on **Wednesday, 18th January, 2017 at 10.00 am** in the **Miles Room, Town Hall, Saturday Market Place** to discuss the business shown below.

Yours sincerely

Chief Executive

**AGENDA**

1. **Apologies**
2. **Notes of the Previous Meeting** (Pages 5 - 10)
3. **Matters Arising**
4. **Declarations of Interest**

Please indicate if there are any interests which should be declared. A declaration of an interest should indicate the nature of the interest (if not already declared on the Register of Interests) and the agenda item to which it relates. If a disclosable pecuniary interest is declared, the Members should withdraw from the room whilst the matter is discussed.

These declarations apply to all Members present, whether the Member is part of the meeting, attending to speak as a local Member on an item or simply observing the meeting.

5. **Urgent Business**

To consider any business which, by reason of special circumstances, the Chairman proposes to accept as urgent under Section 100(b)(4)(b) of the Local Government Act, 1972.

**6. Members Present Pursuant to Standing Order 34**

Members wishing to speak pursuant to Standing Order 34 should inform the Chairman of their intention to do so and on what items they wish to be heard before the meeting commences. Any Member attending the meeting under Standing Order 34 will only be permitted to speak on those items which have been previously notified to the Chairman.

**7. Chairman's Correspondence (if any)**

**8. Rebekah Mercer, Assistant Director of Commissioning & Contracting, and Steve Lloyd, Head of Primary Care - representing CCG**

**9. A Report/Update on the impact of the 'at least x number of dwelling' to the allocations contained within the SADMP (Pages 11 - 24)**

**10. The proposed Local Plan Review Settlement Hierarchy (Pages 25 - 30)**

**11. An overview of the HELAA (Housing and Economic Land Availability Assessment) process and the agreed Norfolk Methodology (Pages 31 - 63)**

(Please note that the HELAA overview refers to the Norfolk Methodology as a link and an appendix, but for ease it is attached as a separate document).

**12. Date of Next Meeting**

The next meeting of the Task Group will take place on Wednesday 22 February 2017 at 10 am in the Miles Room, Town Hall, Saturday Market Place, King's Lynn.

To:

**Local Plan Task Group:** R Blunt (Chairman), A Bubb, C J Crofts, I Gourlay, J Moriarty, M Peake (Vice-Chairman), Miss S Sandell, D Tyler and Mrs E Watson

Claire Dorgan, Principal Planner (Policy)

Alex Fradley

Alan Gomm, LDF Manager

Peter Jermamy

**BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK****LOCAL PLAN TASK GROUP**

**Minutes from the Meeting of the Local Plan Task Group held on  
Wednesday, 14th December, 2016 at 10.00 am in the Miles Room - Town  
Hall**

**PRESENT:** Councillor R Blunt (Chairman)  
Councillors A Bubb, C J Crofts, J Moriarty, M Peake (Vice-Chairman),  
Miss S Sandell, D Tyler and Mrs E Watson

**Officers:**

Claire Dorgan, Principal Planner (Policy)  
Alex Fradley, Planner (Policy)  
Peter Jermany, Principal Planner (Policy)  
Felix Beck, Graduate Planner  
Wendy Vincent, Democratic Services Officer

**1 APOLOGIES**

An apology for absence was received from Mr Chris Humphris, Director of Operations, West Norfolk Clinical Commissioning Group.

**2 NOTES OF THE PREVIOUS MEETING**

The Notes of the meeting held on 16 November 2016 were agreed as a correct record.

**3 MATTERS ARISING**

There were no matters arising.

**4 DECLARATIONS OF INTEREST**

There were no declarations of interest.

**5 URGENT BUSINESS**

There was no urgent business.

**6 MEMBERS PRESENT PURSUANT TO STANDING ORDER 34**

There were no Members present under Standing Order 34.

**7 CHAIRMAN'S CORRESPONDENCE (IF ANY)**

There was no Chairman's correspondence.

8 **INTRODUCTION OF NEW GRADUATE PLANNER**

The Principal Planner (Policy) introduced Felix Beck the new Graduate Planner who had recently commenced employment with the Borough Council.

9 **PRESENTATION AND DISCUSSION FROM THE CHIEF EXECUTIVE OF THE WEST NORFOLK CLINICAL COMMISSIONING GROUP**

The Chairman, Councillor Blunt advised that apologies had been received earlier that morning from Mr Chris Humphris, Director of Operations, West Norfolk Clinical Commissioning Group.

**AGREED:** Mr Humphris be invited to attend the next meeting of the Task Group scheduled to take place on 18 January 2017.

10 **LOCAL PLAN REVIEW - SETTLEMENT HIERARCHY SUGGESTED PREFERRED OPTION**

The Planner provided an overview of the Settlement Hierarchy suggested Preferred Option document as circulated with the Agenda and drew the Task Group's attention to the changes as set out below:

Key Rural Service Centres

- Three Holes had been added to the KRSC of Upwell and Outwell.
- West Walton was now a KRSC on its own, Walton Highway was now a Rural Village.
- Castle Acre and East Rudham remained KRSC's.
- Walpole St. Peter/Walpole St. Andrew/Walpole Marsh had been promoted.
- As had Marshland St. James/St. John's Fen End with Tilney Fen End.
- And Middleton and Southery.

Rural Villages

- Denver, Wiggshall St. Germans, Walpole Highway, Hilgay, Syderstone, Great Bircham/Bircham Tofts, Burnham Overy Staithe and Hillington all remained RV's.
- Walton Highway was now a Rural Village (Member decision).
- Stow Bridge was promoted to this category.

Concern was expressed regarding Three Holes being linked to Upwell/Outwell as Three Holes was predominately in Flood Zone 3 and would therefore fail the sequential test because there were other areas which were safer to build on. The Planner explained that Three Holes

was a smaller settlement and the development boundary was around the northern end of the village, with the remainder being in a flood zone. The Task Group was advised that two sites had been submitted in the recent call for sites exercise. Members were informed that Three Holes was not totally in Flood Zone 3, some parts of Three Holes were in Flood Zones 1 and 3. The Chairman, Councillor Blunt added that the potential sites were not within Flood Zone 3.

Following a discussion on the Local Development Scheme (LDS), the Principal Planner (Policy) explained that the LDS would be brought back to the Task Group with a revised plan to be adopted in early 2019. It was noted that once the new plan was adopted in 2019 new sites could be brought forward.

With regard to comments on officers referring to the “emerging plan”, the Chairman, Councillor Blunt undertook to discuss the points raised with the Executive Director and Planning Services Manager and report back to the Task Group.

In response to comments from the Task Group on the consultation phase and the planning process of the plan being developed and sites not being available until a specific date, it was noted that legal advice would be sought. The Planner read out an extract from NPPF 216:

216. From the day of publication, decision-takers may also give weight<sup>40</sup> to relevant policies in emerging plans according to:

- the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);
- the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

<sup>40</sup> Unless other material considerations indicate otherwise.

The Chairman, Councillor Blunt highlighted the importance of both officers and Members being aware of the whole process.

The Principal Planner (Policy) informed the Task Group that the new plan period was 2016 – 2036. The sites that had already been committed and completed would be taken off the total number required when the new Plan was adopted in 2019. Housing provision would be required up to 2036.

Following a discussion on the five year land supply, the Chairman, Councillor Blunt explained that the calculation allowed the Borough

Council to obtain a more accurate picture which was being reviewed on a regular basis.

Members commented that it would be useful to see the impact of where sites were delivering more than allocated.

In response to questions on the previous Hierarchy consultation exercise and the consequences for villages in relation to previous and new numbers, the Chairman, Councillor Blunt drew Members' attention to the Corridor Plan which identified the required numbers. The Planner advised that the needs assessment exercise was currently in a draft form and would be brought back to the Task Group at a future meeting.

It was reported that Parish Councils had been requested to update the information currently held, but to date a 50% response rate had been achieved. The Principal Planner (Policy) that the current information provided a snapshot in time. The Chairman, Councillor Blunt commented that it sometimes proved difficult to obtain information from Parish Councils and he encouraged all Members to ensure that Parish Councils responded.

Following a discussion, the LDF Team noted the following amendments by the Task Group:

- Walpole Highway to be amended to Walton Highway.
- Impact of where sites were delivering more than allocated to be inserted into the relevant table.
- Walton Highway to be amended as a rural village.

**AGREED:** 1) The amended Preferred Option for the settlement Hierarchy be considered at the February meeting.

2) Members to forward any suggested amendments to the LDF Team.

## 11 **LOCAL PLAN REVIEW - UPDATE ON THE CALL FOR SITES**

The Planner presented the report and explained that 557 sites had been submitted. However, 31 sites had not attached all the information and had to be contacted to request the additional details required.

The Task Group noted that to data 100 sites had been mapped. However, the data had not yet been verified, so there were currently some anomalies in the schedule attached to the Agenda.

Once all the sites had been mapped, the information would be published on the Council's website. Sites submitted would be assessed in line with the Council's Housing and Economic Land Availability (HELAA).



The Planner explained that the inclusion of a site within the HELAA did not mean that it would be allocated, or that planning consent would be given. The HELAA was a technical document which would inform the Local Plan review.

Following comments and the discussion on the phrase “at least”, the Chairman, Councillor Blunt advised that the Inspector had insisted that “at least” should be used. The Principal Planner (Policy) reminded the Task Group that the similar wording “at least” had been used in the Core Strategy, but had not been followed through to the site allocations documents.

Members commented on the Borough Council’s involvement with Fenland District Council Plan.

The Principal Planner (Policy) highlighted that the communication needed to be managed carefully.

In response to questions, the Planner explained that when a site was submitted an email confirmation was sent. If further information was required, the LDF Team would contact the person to try and obtain the details to complete the submission of the site.

**AGREED:** 1) The update report be noted.

2) Overview of the HELAA process to be given to the Task Group at the February meeting.

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### **NEIGHBOURHOOD PLANS - UPDATE**

The Planner provided an update report as circulated with the Agenda.

Members were advised that Snettisham now had a designated area, but had been omitted from the plan. The Planner undertook to revise the plan and circulate an amended version to the Task Group.

It was noted that Brancaster was currently reviewing their plan. The LDF Manager would be assisting with the review process.

The Planner referred to the Neighbourhood Plan Bill and the Government White Paper which may have changes for Neighbourhood Plans.

The Principal Planner (Policy) reported that with the number of Neighbourhood Plans in progress and further ones being submitted, this would present an increase in workload for the small LDF team and would involve attending evening meetings.

A brief discussion took place on the Community Infrastructure Levy (CIL) which would be implemented on 15 February 2017. The

Chairman advised Members that a CIL Officer had been appointed to develop the structures required. Consideration would be given to governance arrangements and criteria for spending the levy at a future Task Group meeting.

The Task Group expressed their thanks to the LDF Team for all their work and efforts to date.

**AGREED:** The Task Group to receive a quarterly update.

13 **SCHEDULE OF MEETINGS 2017**

**AGREED:** The Task Group noted the schedule of Meeting Dates for 2017.

The 15 February meeting be rescheduled to 22 February 2017.

Councillor C J Crofts offered his apologies for the 18 January 2017 meeting.

14 **DATE OF NEXT MEETING**

The next meeting of the Task Group would be held on **Wednesday 18 January 2017 at 10.00 am** in the Miles Room, Town Hall, Saturday Market Place, King's Lynn.

**The meeting closed at 11.32 am**

## **'At Least x Number of Dwellings' – An Update Note**

### **1. Introduction**

1.1 The Inspector examining the Site Allocations and Development Management Policies Plan (SADMP) made a number of recommendations in his final report to the Borough Council, these included changes which would be required to be made to the submitted version of the plan in order for it to be considered 'sound', and therefore could be adopted by the Borough Council. In this case 'sound' means that the plan is positively prepared (meets housing need), justified, effective and consistent with national policy. The Main Modification (MM) of most relevance to this update note can be found at paragraph 21 of his report:

*'21. In order to strengthen the flexibility of the Council's approach it is recommended in MM1 that all the policies include the words 'at least' before the proposed number of dwellings. This reflects the need for the SADMPP to be positively prepared.'*

1.2 This was incorporated as a Main Modification to the submitted version of the SADMP, and therefore appears in the adopted plan. The inspectors report can be viewed in full via the link below:

[https://www.west-norfolk.gov.uk/info/20093/site\\_allocations\\_and\\_development\\_plan/367/examination](https://www.west-norfolk.gov.uk/info/20093/site_allocations_and_development_plan/367/examination)

1.3 At the previous Local Plan Task Group meeting the Members requested an update as to the impact of this Main Modification.

### **2. Schedule of Allocations**

2.1 What follows, at Appendix 1, is a schedule of all the residential housing allocations taken from the adopted SADMP (2016) and includes the details of planning permissions granted and those currently under consideration, as of 23<sup>rd</sup> of December 2016.

- 2.2 Please note that this is a snap shot in time and includes full planning permissions, outline planning permissions and pre-application enquiries. Whilst some applications might be withdrawn or modified over time, those that are under consideration have been included so that what is being proposed currently is taken into account along with what already has planning permission.
- 2.3 The schedule displays a simple traffic light approach, with those sites highlighted in green potentially providing a higher number of dwellings, amber sites providing the same number, and red sites providing fewer dwellings than stated by the relevant policy.
- 2.4 The schedule illustrates that 10 sites have/are coming forward for less than the dwelling number allocated. 17 sites have come forward for the same number they have been allocated for. Whilst 31 Sites have come forward detailing a higher number than the minimum allocated for. Note that the West Winch Growth Area and the Hopkins Homes application covering the northern portion of this strategic site have not been included within this calculation. This would alter the numbers and would not be considered to give a true picture at this time.
- 2.5 Overall there is currently potentially for an additional 795 dwellings. The reasons for sites providing a certain number of dwellings are site specific, for example a site might be able to provide a higher number if the area of allocation is sufficient. The constraints upon the site will be an important factor. In some cases the lack of a demonstrable housing land supply resulted in a larger area than that allocated or proposed for allocation gaining planning permission.

### **3. Land Supply Impact and Meeting Housing Need**

- 3.1 The NPPF is clear, at paragraph 47, that in order to deliver a wide choice of high quality homes local planning authorities should boost significantly the supply of housing. It would appear that by expressing the allocations as a minimum this is assisting with this requirement. This also means that the SADMP strategy is based upon meeting the identified housing need.

3.2 This is evidenced by The 'Heacham' Inspector in his decision letter, which stated:

*'37. In support of the Council's trajectory, I note that a number of SADMP allocations have either been granted planning permission or are in the process of obtaining permission. Additionally, the allocations in the SADMP are expressed as minima and it is not inconceivable that some allocated sites will yield more than envisaged in the plan. This is evidenced more generally in the LPA's response to the SADMP Inspector on this matter and is exemplified locally in Heacham on the main allocation at site G47.1 (where the total allocated capacity has been permitted on approximately half the allocated site area). Accordingly, I consider the LPA's assessment on the scale of supply from the SADMP allocations is not over-inflated.'*

The Inspectors 'Heacham' decision letter can be viewed in full via the link below:

[https://www.west-norfolk.gov.uk/info/20185/planning\\_policy\\_research/353/five\\_year\\_supply\\_of\\_housing](https://www.west-norfolk.gov.uk/info/20185/planning_policy_research/353/five_year_supply_of_housing)

#### **4. Conclusion**

4.1 It is clear that by expressing the SADMP allocations as 'At Least x number of dwellings' is having a positive impact upon the number of dwellings coming forward. Whilst some sites have come forward for the same number of dwellings as specified by the relevant policy as a minimum, and some have even come forward for less, overall 3,613 dwellings are potentially coming forward on allocations for 2,818 dwellings. This represents a further 795 dwellings coming forward that could have without the Main Modification. This accounts for in excess of one year's worth of supply with an FOAN of 710 dwellings per year, and highlights the importance of the Main Modification in the context of five year housing land supply and meeting the housing need of the borough.

4.2 Whilst there is the potential for sites to come forward for a higher number than the minimum number provided by the relevant SADMP Policy, the proposal will still be judged against that policy, others contained within the SADMP and Core Strategy, as well as National Policy.

**Appendix 1 Schedule of SADMP Allocations**

Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application / permission	SADMP Dwelling Allocation ('At Least')	Difference
King's Lynn	E1.4 Marsh Lane	15/00828/FM (granted)	130	130	130	0
	E1.5 Boal Quay		350			
	E1.6 South of Parkway		260			
	E1.7 Lynnsport	Lynn Sport is split across 4 sites known as Lynn Sport 1, Lynn Sport 3, Lynn Sport 4 & Lynn Sport 5. Lynn Sport 3 – PP for 54 dwellings, 16/00097/FM, is programmed for an official start on site in March 2017, with a 1 year build period, to May 2018. Lynn Sport 4 & 5 - application for 89 dwellings, 16/01327/FM, anticipated a start on site date of March 2018, complete October 2020. Lynn Sport 1 - full planning permission submitted December 2016, 16/02227/FM for 82 dwellings, start on site March 2018 built out by October 2020.	297	225	297	-72
	E1.8 South Quay		50			

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Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application / permission	SADMP Dwelling Allocation ('At Least')	Difference
	E1.9 Columbia Way		100			
	E1.10 Wisbech Road		50			
	E1.11 Southgates		20			
West Lynn	E1.14 St Peters Road	16/01327/FM, for part of the site for 44 dwellings.	49	44	49	-5
	E1.15 Bankside		120			
West Winch	Growth Area E2.1	13/01615/OM pending consideration (northern portion of the site, for 1,100 dwellings)	1,600			

Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application / permission	SADMP Dwelling Allocation ('At Least')	Difference
South Wootton	E3.1	The majority of the site is being promoted by Lark Fleet Homes, a house building firm; they carried out a public exhibition at South Wootton in December 2016. They have recently submitted a pre-app detailing 450 dwellings 16/00172/PREAPP. A smaller, northern, portion of the site has come forward with a pre-application 16/00147/PREAPP for approx.145 dwellings. A further smaller portion is owned by Norfolk County Council which as yet has not come forward.	300	595	300	295
Knights Hill	E4.1	15/01782/OM (pending consideration) 13/00033/PREAPP	600	65 650	600	115
Downham Market	F1.3	14/00045/PREAPP 15/00104/PREAPP	250	150 250	250	150



Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application / permission	SADMP Dwelling Allocation ('At Least')	Difference
	F1.4	15/00135/OM (granted)	140	170	140	30
Hunstanton	F2.2	16/00082/OM (permitted)	120	120	120	0
	F2.3	16/00084/OM (pending consideration)	50	60	50	10
	F2.4	14/01022/FM (granted)	163	166	163	3
	F2.5 (Employment)	16/00084/OM (pending consideration)				
Wisbech Fringe	F3.1		550			
Brancaster	G13.1	15/00187/PREAPP	5	8	5	3
Burnham Deepdale (Brancaster Staithe)	G13.2	16/02140/FM (pending consideration)	10	12	10	2
Burnham Market	G17.1	13/01810/FM	32	32	32	0
Castle Acre	G22.1	15/00942/OM	15	15	15	0

Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application / permission	SADMP Dwelling Allocation ('At Least')	Difference
Clenchwarton	G25.1	15/01315/OM	10	10	10	0
	G25.2	15/01269/OM	20	19	20	-1
	G25.3	15/02008/O & 16/00305/OM	20	20	20	0
Denver	G28.1		8			
Dersingham	G29.1	15/00129/PREAPP	20	30	20	10
	G29.2	16/00144/PREAPP	10	10	10	0
Docking	G30.1	16/00866/OM (pending consideration)	20	33	20	13
East Rudham	G31.1		10			
East Winch	G33.1	15/01793/OM	10	10	10	0
Emneth	G34.1		36			
Feltwell	G35.1	16/00125/PREAPP	50	60	50	10
	G35.2		40			

Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application / permission	SADMP Dwelling Allocation ('At Least')	Difference
	G35.3		10			
Hockwold	G35.4	15/01472/F	5	3	5	-2
Fincham	G36.1	16/01747/FM	5	5	5	0
Gayton	G41.1	15/01888/OM	23	40	23	17
Grimston & Pott Row	G41.2	15/01786/OM	23	27	23	4
Great Bircham	G42.1	16/00888/O (pending consideration)	10	11	10	1
Great Massingham	G43.1	16/01634/OM (pending consideration)	12	16	12	4
Harpley	G45.1		5			
Heacham	G47.1	15/00352/OM granted for 69 dwelling on approx. 50% of the site. 16/01385/FM pending consideration for 133 dwellings on all of the site.	60	133	60	73
	G47.2	16/00245/O	6	8	6	2

Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application / permission	SADMP Dwelling Allocation ('At Least')	Difference
Hilgay	G48.1	16/00718/OM (pending consideration)	12	17	12	5
Hillington	G49.1		5			
Ingoldisthorpe	G52.1	15/02135/OM	10	15	10	5
Marham	G56.1		50			
Marshland St James	G57.1	15/01826/OM	15	17	15	2
	G57.2		10			
Methwold	G59.1	15/01683/FM	5	30	5	25
	G59.2	15/02125/FM	25	44	25	19
	G59.3	15/02122/OM	10	12	10	2
	G59.4	16/00611/F (pending consideration)	5	5	5	0
Middleton	G60.1		15			

Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application / permission	SADMP Dwelling Allocation ('At Least')	Difference
Runcton Holme	G72.1	16/01186/OM (pending consideration)	10	10	10	0
Sedgeford	G78.1	16/01414/O (pending consideration)	10	9	10	-1
Shouldham	G81.1		5			
	G81.2	16/01515/O (pending consideration)	5	8	5	3
Snettisham	G83.1	15/02006/OM & 14/00944/FM	34	32	34	-2
Southery	G85.1	16/00658/FM	15	19	15	4
Stoke Ferry	G88.1	15/01931/OM	5	5	5	0
	G88.2	16/00168/OM	10	20	10	10
	G88.3	16/00493/FM	12	29	12	17
Syderstone	G91.1		5			

Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application / permission	SADMP Dwelling Allocation ('At Least')	Difference
Ten Mile Bank	G92.1	15/00222/O (part of the site)	5	3	5	-2
Terrington St Clement	G93.1		10			
	G93.2	15/01856/FM (pending consideration)	17	18	17	1
	G93.3	16/00084/PREAPP	35	35	35	0
Terrington St. John, St. John's Highway & Tilney St. Lawrence	G94.1	15/00438/OM	35	35	35	0
	G94.2		40			
Three Holes	G96.1	15/01399/O & 15/01402/O	5	4	5	-1
Tilney All Saints	G97.1		5			
Upwell	G104.1		5			
	G104.2		5			
	G104.3		5			

Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application / permission	SADMP Dwelling Allocation ('At Least')	Difference
	G104.4	14/00504/F & 15/01496/OM	15	27	15	12
Outwell	G104.5	16/00248/OM	5	40	5	35
	G104.6		35			
Walpole Highway	G106.1	15/01412/O & 16/00113/O	10	8	10	-2
Walpole St. Peter / Walpole St. Andrew / Walpole Marsh	G109.1	16/01867/O & 16/01705/O (these do not cover all of the site, 8 dwellings)	10			
	G109.2	15/01520/OM	10	10	10	0
Watlington	G112.1		32			
Welney	G113.1		7			
	G113.2		13			
Wereham	G114.1	16/01378/FM	8	10	8	2

Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application / permission	SADMP Dwelling Allocation ('At Least')	Difference
Walton Highway/West Walton	G120.1	16/00023/OM	10	10	10	0
	G120.2	16/00482/OM	10	10	10	0
Wiggenhall St. Germans	G123.1	15/01424/O	5	4	5	-1
Wiggenhall St. Mary Magdalen	G124.1		10			
<b>TOTAL</b>			<b>6294</b>	<b>3613</b>	<b>2818</b>	<b>795</b>

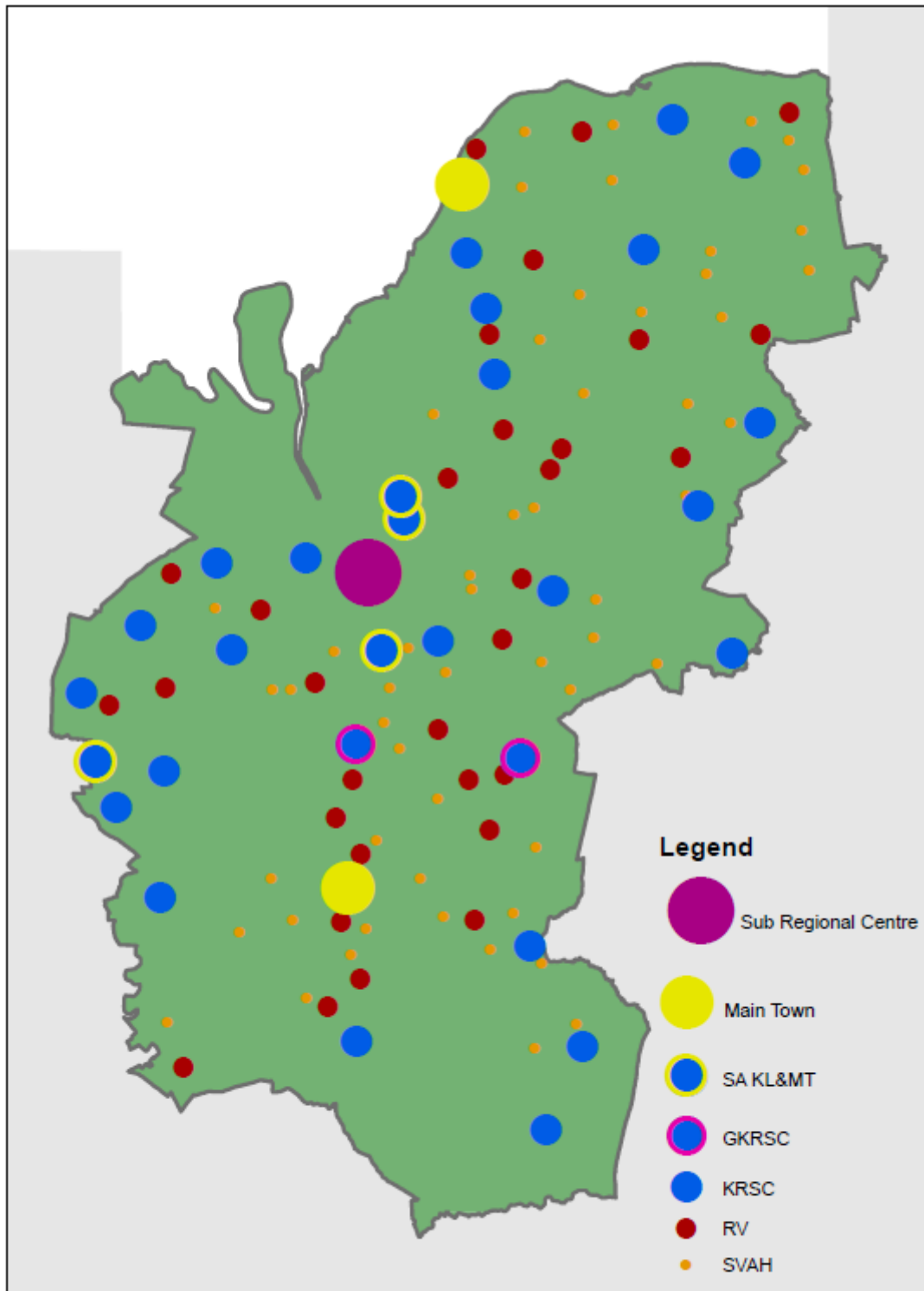


## **The Proposed Local Plan Review (2016 -2036) Settlement Hierarchy**

- 1.1 This paper aims to capture all of the previous paper's outputs and ensuing debates surrounding the settlement hierarchy, and present the latest version of the proposed settlement hierarchy for the Local Plan review (2016 -2036). The one change to the last paper is that Walton Highway is a Rural Village (RV) and not a Smaller Village and Hamlet (SVAH), based upon political judgement in combination with scores from the study and the settlement's geographic location.
- 1.2 What follows is the settlement hierarchy in tabular format and a map to illustrate the geographic distribution of the settlements and their tier classification across the borough.
- 1.3 One remaining issue is the classification of Three Holes. Currently this is a Rural Village (Core Strategy 2011). It had been proposed to be included with Outwell and Upwell as a Joint Key Rural Service Centre (KRSC).
- 1.4 On page 5 of this paper is a map of Three Holes which displays the development boundary and site allocation, as per the Site Allocations and Development Management Policies Plan (2016), it also shows the flood risk. The flood risk displayed is Flood Zone 2, Flood Zone 3, and the Hazard Zone from the borough's Strategic Flood Risk Assessment (2009).
- 1.5 On page 6 is a map of the wider area displaying Outwell, Upwell and Three Holes. Again the development boundary and site allocations are shown, along with the Flood Risk, as per the pervious map of just Three Holes.
- 1.6 These maps show that if the settlements were to be joined as a KRSC areas of Outwell and Upwell would be sequentially preferable to the majority of Three Holes.
- 1.7 Three Holes had been proposed to be added to this KRSC as the settlements are Inter-connected, representing a continuation of linear settlements and the Development Boundary. Therefore the linkage would be logical and similar to that seen with some of the other joint settlements. Three Holes has a relatively small population of 390 (2011 census) making it one of the smaller RV's, and as the maps illustrate the development boundary covers a small area, with areas south of the Middle Level Main Drain excluded.

<b>The Proposed Local Plan review (2016 -2036) Settlement Hierarchy</b>			
<b>1. Sub-Regional Centre (1)</b>			
King's Lynn, including West Lynn			
<b>2. Main Towns (2)</b>			
Downham Market		Hunstanton	
<b>3. Settlements Adjacent to King's Lynn and the Main Towns (4)</b>			
North Wootton		West Winch	
South Wootton		Wisbech Fringe (Inc. Walsoken)	
<b>4. Growth Key Rural Service Centres (2)</b>			
Marham		Watlington	
<b>5. Key Rural Service Centres (23)</b>			
Brancaster with Brancaster Staithe/Burnham Deepdale	Feltwell with Hockwold-cum-Wilton	Stoke Ferry	
Burnham Market	Great Massingham	Southery	
Castle Acre	Grimston/Pott Row with Gayton	Terrington St Clement	
Clenchwarton	Heacham	Terrington St John with St Johns Highway/Tilney St Lawrence	
Dersingham	Methwold with Northwold	Upwell/Outwell/Three Holes	
Docking	Marshland St James/St John's Fen End with Tilney Fen End	Walpole St Peter/Walpole St Andrew/Walpole Marsh	
East Rudham	Middleton	West Walton	
Emneth	Snettisham		
<b>6. Rural Villages (32)</b>			
Ashwicken	Harpley	Stow Bridge	Welney
Burnham Overy Staithe	Hilgay	Syderstone	Wereham

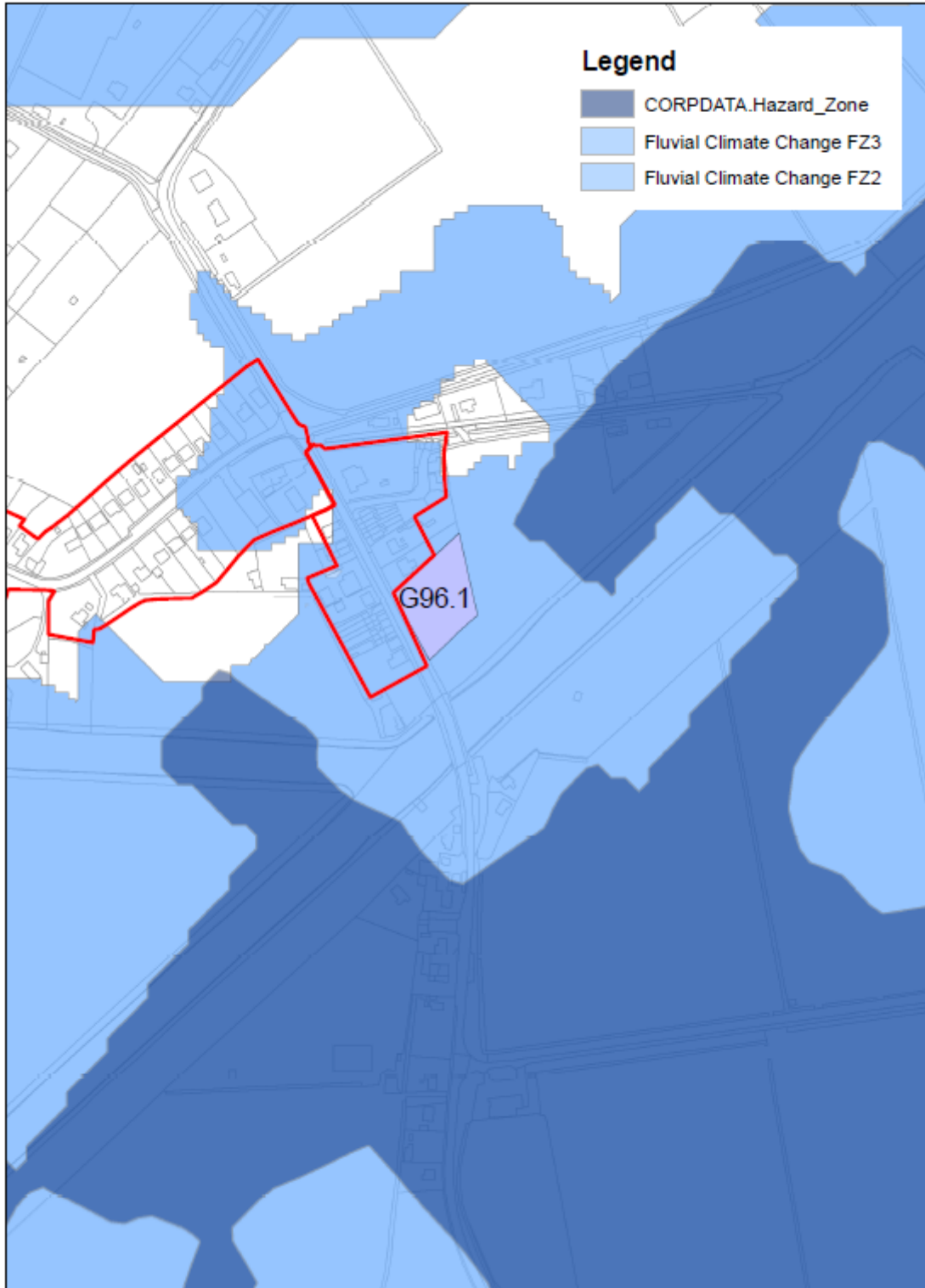
Castle Rising	Hillington	Ten Mile Bank	West Newton
Denver	Ingoldisthorpe	Thornham	Wiggenhall St Germans
East Winch	Old Hunstanton	Tilney All Saints	Wiggenhall St Mary Magdalen
Fincham	Runcton Holme	Walpole Cross Keys	Wimbotsham
Flitcham	Sedgeford	Walpole Highway	Wormegay
Great Bircham/ Bircham Tofts	Shouldham	Walton Highway	
<b>7. Smaller Villages and Hamlets (54)</b>			
Anmer	Congham	North Creake	Tinley cum Islington
Bagthrope with Barmer	Crimplesham	North Runcton	Tichwell
Barroway Drove	East Walton	Pentney	Tottenhill
Barton Bendish	Fordham	Ringstead	Tottenhill Row
Barwick	Fring	Roydon	West Acre
Bawsey	Gayton Thorpe	Ryston	West Bilney
Bircham Newton	Hay Green	Saddlebow	West Dereham
Blackborough End	Holme next the Sea	Salters Lode	West Rudham
Boughton	Lakesend	Setchey	Whittington
Brookville	Leziate	Shernbourne	Wiggenhall St Mary the Virgin
Burnham Norton	Little Massingham	Shouldham Thorpe	Wolferton
Burnham Overy Town	Methwold Hythe	South Creake	Wretton
Burnham Thorpe	New Houghton	Stanhoe	
Choseley	Nordelph	Stow Bardolph	



**Proposed Local Plan Review (2016 - 2036) Settlement Hierarchy**

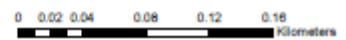
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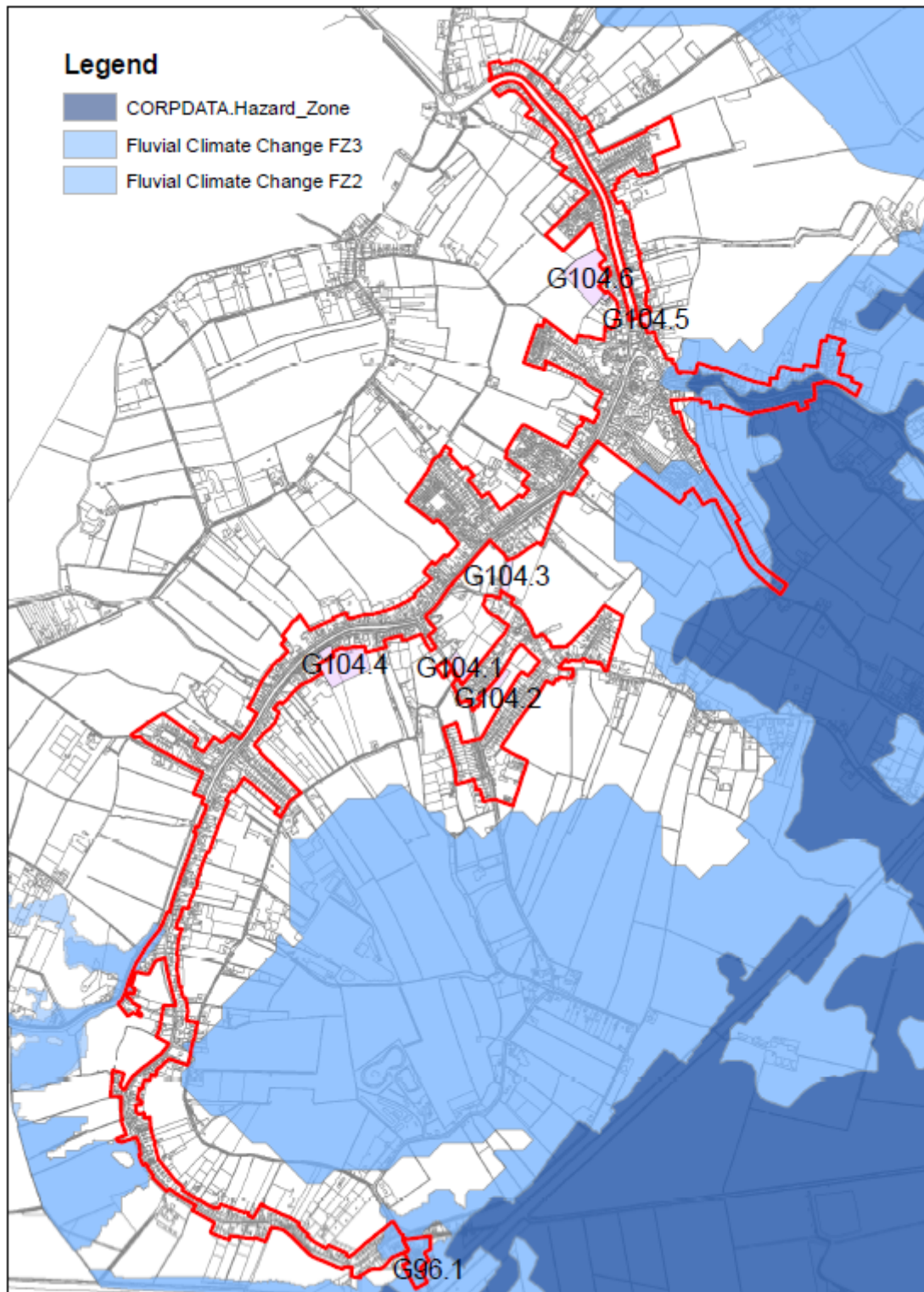




**Three Holes**

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## **Housing and Economic Land Availability Assessment (HELAA)**

1.1 The Housing and Economic Land Availability Assessment (HELAA) is an appraisal of the amount of land available within the borough for housing and economic development which is required in order to assess the capacity of suitable land. The period covered is the same as the Local Plan review 2016 to 2036.

1.2 Its purpose is to test whether there is sufficient land to meet the full objectively assessed need (FOAN) and identify where this may be located.

1.3 It is important to note that the HELAA does not allocate land for development or determine whether a site should be given planning permission for development. This is the role of the Local Plan and the development management process. Similarly, the non-inclusion of a site does not preclude future development, providing proposals meet planning policy that is in place at the time that a site comes forward.

1.4 The HELAA aims to provide a realistic number of dwellings that each site can potentially provide by assessing each site in order to determine whether it is suitable, available and achievable for housing. It also indicates the timescales for their delivery.

1.5 The HELAA Methodology we intend to use has been prepared in accordance with the NPPF and the PPG. A Link to the planning practice guidance HELAA section is provided below:

<http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/>

1.6 This methodology has been developed by all of the Norfolk Local Planning Authorities as part of the 'Duty to Cooperate', through the housing working group of the Norfolk Strategic Framework.

1.7 Using a consistent methodology should ensure that each planning authority prepares its HELAA in a consistent way. The methodology has been through public consultation in 2016. The final agreed HELAA methodology can viewed by following the link below, and is included as an appendix to this paper:

<http://www.north-norfolk.gov.uk/planning/21445.asp>

1.8 The HELAA is a key background evidence document, which together with other studies, informs and supports the housing delivery strategy in the King's Lynn and West Norfolk Local Plan review.

1.9 Overleaf is a brief overview of the HELAA process, the steps involved and the outcomes of this technical study. For a more detailed approach please see the final agreed Norfolk HELAA methodology.



**The Norfolk HELAA covers this in greater detail, but briefly the process is:**

- 1. Identify sites and broad locations** – here sites from a variety of sources including local plan allocations and those with extant planning permission, along with those from the recent ‘Call for Sites and Policy Suggestions’ consultation are identified. We have decided to set a threshold of sites that are capable of delivering 5 or more dwellings, or are at least 0.25 hectares in size within or immediately adjacent to development boundaries of settlements identified for larger scale growth within the adopted Local Plan and emerging Local Plan review Settlement Hierarchy. This doesn’t apply to those sites with planning permission or within an adopted Local Plan document. At this stage some sites will be discounted such as those within environmental designations, functional flood plain (FZ3b), and those at risk from coastal erosion.
  
- 2. Site Assessments** – the purpose of this stage is to determine if sites are deliverable or developable. Deliverable sites are sites which are suitable, available now and achievable within five years. Developable sites are sites which are suitable with a reasonable prospect that they could be available and achievable within the plan period. We intend to use the same approach to calculating housing capacity as previously used, this is described in the HELAA methodology. The assessment of suitability - 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. 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.

The types of constraint and impacts the sites will be assessed against are:

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

Again the methodology goes into greater detail for each criterion, and of course the relevant statutory consultees will be consulted on the sites which have come forward as part of the recent call for sites and policy suggestions consultation, with their expert comments being taken on-board.

Assessment of availability and achievability will be based upon the information gained from the call for sites; hence we asked those responding for an increased level of detail on these issues than previously. We did gain such information before for but at a later stage and predominantly just for those being proposed as preferred options / allocations.

- 3. Windfall Sites** – we will make an allowance for windfall sites. We may depart slightly from the methodology here although remaining broadly consistent. As we have a local approach to calculating this for both large and small sites, which has been tested at examination, mentioned and accepted by the ‘Heacham’ appeal Inspectors decision letter.
- 4. Review** – essentially this is review of the HELAA process, ensuring that there is enough land within the borough to meet the FOAN, and explore options if there is not.
- 5. Finalising the HELAA** – Planning Policy Guidance is clear that the HELAA should contain certain standard outputs. These are:
  - a list of all sites 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. This would include the five year housing land supply position.

**Please note that this is a broad and brief overview of the HELAA process, as previously mentioned more detail is included within the agreed Norfolk HELAA methodology.**

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

## Methodology

Final - July 2016

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### Document Control

Version 1 Consultation version	March 2016
Final Draft version (tracked changes )	01 July 2016
Final version	12 July 2016

## 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.

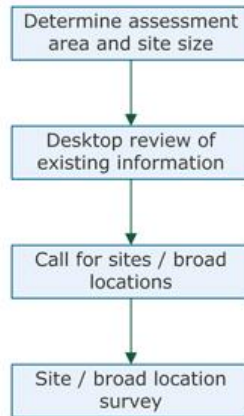
- 1.9 The Consultation for the HELAA methodology was undertaken across the seven districts and the Broads Authority between 21 March and 3<sup>rd</sup> May 2016. In total 25 responses were made with approximately 110 individual comments from developers, landowners and landowners' agents, specific consultees 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

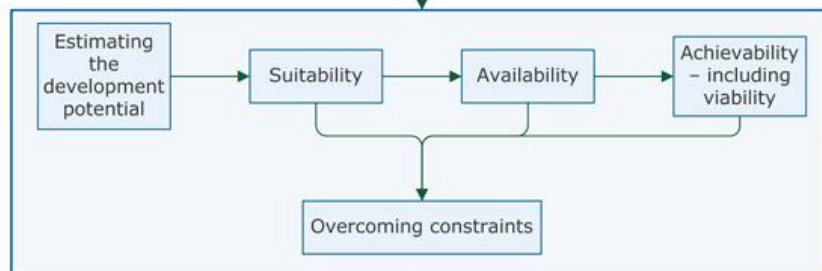
2.1 The assessment will consist of five stages which are discussed below. These stages are based on those set out in the National Planning Practice Guidance. The flow chart shown in Figure 2.1 below summarises the methodology.

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

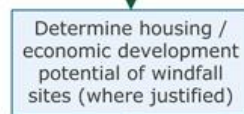
**Stage 1 - Site / broad location identification**



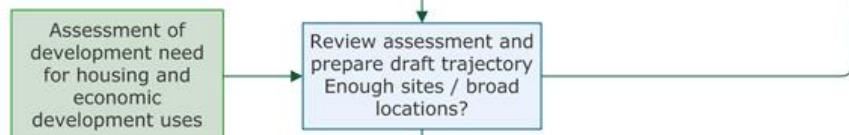
**Stage 2 - Site / broad location assessment**



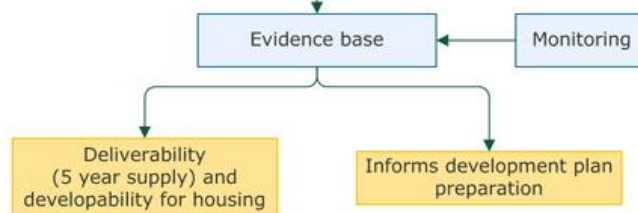
**Stage 3 - Windfall assessment**



**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.

9

## 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>		

<b>Utilities Capacity</b>		
<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>		

<b>Utilities Infrastructure</b>		
<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>		

<b>Contamination and ground stability</b>		
<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>		

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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>		

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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