

# **Joint Strategic Housing Land Availability Assessment Methodology**

**Suffolk Coastal District Council  
&  
Ipswich Borough Council**

**April 2009**



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# 1. Introduction

- 1.1 Planning Policy Statement 3 (PPS3): Housing (published November 2006) sets out the Government's national planning policy framework for housing. It states the Government's key housing policy goal is *"to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live."* Included within the Government's housing policy objectives is one for *"the provision of a flexible, responsive supply of land – managed in a way that makes efficient and effective use of land, including re-use of previously developed land where appropriate"*. In order to achieve this, PPS3 requires local authorities to identify specific deliverable sites within their Local Development Frameworks (LDF) which will deliver housing for the first 5 years from adoption of the relevant development plan document (DPD) and then to identify locations and sites that will enable the delivery of housing for at least 15 years from the date of adoption of the development plan document.
- 1.2 In order to achieve a 15 year housing land supply, in a manner which meets the Government's key housing policy goal at the local level, PPS3 requires local authorities to produce two complementary documents: a Strategic Housing Land Availability Assessment (**SHLAA**) and a Strategic Housing Market Assessment (**SHMA**). Together these documents provide, at the local level, evidence of the need and demand for housing and the opportunities, which exist to meet it. This evidence will be used to inform policy decisions made through the relevant LDF documents. A SHMA for the two council areas (Ipswich and Suffolk Coastal) has already been undertaken as part of wider SHMA commissioned jointly between Ipswich Borough Council, Suffolk Coastal District Council, Babergh District Council and Mid-Suffolk District Council. That document highlighted amongst other things, the close relationship in housing market terms between the Ipswich and Suffolk Coastal areas and as such a joint approach to a SHLAA is considered appropriate. With regard to the other two authorities i.e. Babergh and Mid-Suffolk these two councils are currently undertaking a joint SHLAA with their other neighbouring authorities namely Forest Heath and St Edmundsbury. Compatibility between this SHLAA and the other joint SHLAA will therefore be important to provide detailed picture for the SHMA area.
- 1.3 Detailed guidance on producing a SHLAA was published in July 2007 by the Department of Communities and Local Government (dCLG) 'Strategic Housing Land Availability Assessments Practice Guidance' (the Guidance). The Guidance strongly recommends the use of the standard methodology set out within it, noting that in doing so a local planning authority should not need to justify the methodology used in preparing its assessment including at independent examination. This methodology has therefore been drafted in line with the approach suggested in the Guidance, but including where appropriate local interpretations and definitions appropriate to the Ipswich and Suffolk Coastal local area (the study area).
- 1.4 A four-week consultation with stakeholders in respect of the draft methodology occurred from 23<sup>rd</sup> October – 24<sup>th</sup> November 2008. Comments were noted and the response of the two councils is shown in Annex D.

## **Working in Partnership**

- 1.5 The dCLG advocate a partnership approach when undertaking a SHLAA to ensure a joined up and robust approach. To ensure this is achieved this joint SHLAA will be carried out by the following two administrative areas within Suffolk:
- Ipswich Borough Council
  - Suffolk Coastal District Council
- 1.6 The two authorities are at a fairly similar stage in the preparation of their Local Development Frameworks and have a strong interrelationship within a broader housing market area despite their very different physical characteristics i.e. the first, one large urban area, the second, a largely rural area interspersed with six small/medium sized market/seaside towns, but also including an urban area abutting the Ipswich borough boundary (part of the Ipswich Policy Area (IPA)). A joint approach to the methodology employed in undertaking the SHLAA will ensure that housing requirements are considered consistently across these adjoining areas, taking into account the requirements set out in the recently adopted Regional Spatial Strategy – The East of England Plan (May 2008) which sets separate housing figures for the Ipswich Policy Area and the remainder of the Suffolk Coastal District Council area. Map 1 in Annex A shows the Ipswich study area consisting of the IP-One Area Action Plan area and the rest of the borough. Map 2 in Annex A shows the area of Suffolk Coastal District Council.
- 1.7 In addition, each authority updated their own Urban Capacity Study in 2007/08, ensuring at that time, that similar site size thresholds and approaches were used to identify sites. This was an added factor when contemplating undertaking partnership working between the two authorities as advocated in the Guidance.

## **Purpose of the assessment**

- 1.8 The Guidance defines the main purpose of a SHLAA as being to:
- Identify sites with potential for housing;
  - Assess their housing potential; and
  - Assess when they are likely to be developed.
- 1.9 Annex C of PPS3 expands on this stating that the key purposes of a SHLAA are to:
- Assess the likely level of housing that could be provided if unimplemented planning permissions were brought into development;
  - Assess land availability by identifying buildings or areas of land (including previously-developed land and greenfield) that have development potential for housing, including within mixed-use developments;

- Assess the potential level of housing that can be provided on identified land;
- Where appropriate, evaluate past trends in windfall land coming forward for development and estimate the likely future implementation rate;
- Identify constraints that might make a particular site unsuitable/ unviable/ unavailable for development; and
- Identify what action could be taken to overcome constraints on particular sites.

1.10 SHLAA's therefore go beyond the scope of existing urban capacity studies by:

- Reviewing sites within existing urban capacity studies to assess their continuing availability and to review assumptions on housing potential;
- Identifying additional sites with potential for housing which were not investigated by these studies, such as sites in rural settlements, brownfield sites outside settlement boundaries and suitable greenfield sites as well as broad locations where necessary; and
- Assessing the deliverability/developability of all sites and how market conditions may affect economic viability.

1.11 The purpose of the assessment is to seek to identify as many suitable sites in and around as many sustainable settlements as possible within the study area (i.e. the two districts). It should be noted at this stage that a sustainable settlement is defined for the purposes of this SHLAA as a settlement where some new development is considered acceptable within each of the new LDF Core Strategy DPD's. A full list of all the settlements, which will be considered, can be found in Annex B of this document.

## Requirements of the assessment

1.12 The key outputs and process requirements are set out in the Guidance as follows

**Table 1: Key Outputs from the SHLAA**

1	A list of sites, cross referenced to maps showing locations and boundaries of specific sites (and broad locations where necessary)
2	Assessment of the deliverability/developability of each identified site (i.e. in terms of its suitability, availability and achievability) to determine when an identified site is realistically expected to be developed
3	Potential quantity of housing that could be delivered on each identified site or within each identified broad location (where necessary) or on windfall sites (where justified)
4	Constraints on the delivery of identified sites
5	Recommendations on how these constraints could be overcome and when

1.13 The authorities undertaking the SHLAA will ensure that the Guidance as set out in Table 2 below will be complied with, namely:

**Table 2 Strategic Housing Land Availability Assessment process checklist (dCLG Guidance 2007)**

1.	The survey and Assessment will involve key stakeholders including house builders; social landlords; local property agents and local communities. Other relevant agencies may include the Homes and Communities Agency (formerly the Housing Corporation and English Partnerships) (a requirement where they are particularly active).
2.	The methods, assumptions, judgements and findings will be discussed and agreed upon throughout the process in an open and transparent way, and explained in the Assessment report. The report will include an explanation as to why particular sites or areas have been excluded from the Assessment.

## 2. Methodology

- 2.1 The SHLAA Guidance sets out eight main stages to the assessment, which will be followed, together with two further stages that should be undertaken in certain circumstances. In summary the stages are:

**Stage 1:** Planning the Assessment

**Stage 2:** Identifying sources of sites to be included in the Assessment

**Stage 3:** A desktop review of existing information

**Stage 4:** Determining which sites and areas will be surveyed

**Stage 5:** Carrying out the survey

**Stage 6:** Estimating the housing potential of each site

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

**Stage 8:** A review of the Assessment

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**Stage 9:** Identifying and assessing the housing potential of broad locations (when necessary) and

**Stage 10:** Determining the housing potential of windfalls (where justified)

### Stage 1: Planning the Assessment

- 2.2 Officers from the Planning Policy teams at Ipswich and Suffolk Coastal councils will undertake the assessment work. The boundaries of the assessment areas are illustrated on Maps 1 and 2 attached at Annex A. Whilst it is important that the Planning Policy teams undertake the assessment to ensure the reasons for putting some sites forward above others is fully understood and that the assessment is sound, it may be necessary to acquire some external resources to assist with certain elements of the project work once the full scope of the assessment is known. In particular use will be made of the information and viability assessment work coming out of the SHMA. It is also intended that help in the form of information and advice will be sought from the key stakeholders identified at Annex C, some of whom were also involved the SHMA.

## Timetable

- 2.3 The results of this assessment will be required to feed into the preparation stage of the Core Strategy DPD and Site Allocations DPD of each authority prior to their examination in public (EIP) and the IP-One Area Action Plan in the case of Ipswich. This requires that a draft document is completed by the end of May 2009.

**Table 3: Proposed SHLAA Timetable**

Date	Activity
September/October 2008	<ul style="list-style-type: none"><li>• Draft and agree methodology ready for consultation</li><li>• Desktop review of existing data</li></ul>
October/November 2008	<ul style="list-style-type: none"><li>• 4 week consultation on methodology</li></ul>
November/December 2008	<ul style="list-style-type: none"><li>• Review consultation responses</li><li>• Complete desktop review of existing data</li><li>• Undertake site surveys</li></ul>
January 2009	<ul style="list-style-type: none"><li>• Produce adopted methodology document</li><li>• Undertake site surveys</li></ul>
February - April 2009	<ul style="list-style-type: none"><li>• Undertake viability assessment</li></ul>
April – June 2009	<ul style="list-style-type: none"><li>• Produce first draft document</li><li>• Meet with stakeholder working group</li><li>• Review responses and prepare second draft document</li></ul>
July 2009	<ul style="list-style-type: none"><li>• Publish findings and consult stakeholders</li></ul>

- 2.4 As noted a number of key stakeholders have been identified for involvement in the SHLAA. It is intended that they and other stakeholders listed at Annex C will be invited to help both scrutinise and input into the assessment process. Key stakeholders will include amongst others:

- Government Office for the East of England
- Registered Social Landlords
- Suffolk County Council
- Home Builders Federation
- Other neighbouring authorities
- Major planning agents/builders operating within the SHLAA area
- Homes and Communities Agency

## Stage 2: Determining which sources of sites will be included in the assessment

- 2.5 The Guidance identifies different sources of sites with potential for housing. Table 4 below identifies these sources and describes the methods, which will be used to collect the data. It should be noted however, that some sources may not be readily available or appropriate for the area covered by the SHLAA, or difficulty may be experienced in finding some sources of supply.

**Table 4: Sources of sites with potential for housing**

Type of Site and Source	Data Collection Method / Further Information
<b>Sites within the planning process</b>	
Review of existing housing allocations in plans	There may be land in the SHLAA area that benefits from a housing allocation in a “saved policy” which is likely to be implemented or could be developed to a higher density than originally considered. Alternatively, there may also be reasons for non-delivery, which need to be investigated. Outstanding housing allocations will therefore be reviewed in order to undertake an audit of the anticipated housing yield and delivery timescale.
Unimplemented / outstanding permissions (not started or under construction)	An analysis of outstanding residential planning permissions will be undertaken using annual housing monitoring data. Each authority will use this information to make an assessment of sites coming forward. Further checks will be made with the relevant agent/applicant against those sites with extant planning permission for 5 or more dwellings in Suffolk Coastal and 10 or more dwellings in Ipswich, but where no work had commenced on site as at 1 <sup>st</sup> April 2008 to determine continuing viability and anticipated timescales for development.
Review of other existing allocations in plans	Allocations for other land uses that are not realistically likely to be taken up in the quantities envisaged will be reviewed. This is to assess whether these might be released for residential purposes instead. Judgements made on individual allocations will reflect progress and decisions made to date through the respective LDF process. It is accepted that for both authorities decisions in relation to such sites may well change when this assessment is reviewed.
<b>Sites not currently in the planning process</b>	
Previously-developed vacant and derelict land and buildings (non housing)	Previously-developed land comprises those sites that have been used for other purposes and that have now become available for beneficial redevelopment. Both authorities undertook detailed and comprehensive urban capacity studies in 2007/08. These studies will be updated primarily as a desktop exercise. However additional site visits will be undertaken to identify brownfield sites outside of settlements identified as sustainable and within any such settlements not forming part of the 2007/08 studies.



Surplus public sector land	Surplus public sector land will be identified through English Partnerships register of surplus public sector land, available at <a href="http://www.englishpartnerships.co.uk/rspsl.htm">http://www.englishpartnerships.co.uk/rspsl.htm</a> , and local authority registers of land in their ownership, which is surplus to requirements. Site availability will also be confirmed through consultation with public bodies such as the NHS and MOD, and Suffolk County Council.
Land in non-residential use which may be suitable for re-development for housing	These sites will be picked up from the update of the 2007/08 Urban Capacity studies, and from an assessment of vacant premises identified on the non-domestic business rates.
Additional housing opportunities in established residential areas, such as under-used garage blocks	These sites will be picked up from the update of the 2007/08 Urban Capacity studies. Further consultation will be undertaken with local RSL's, and Local Authority Housing Sections, as the major developer of this land source type.
Large scale redevelopment and re-design of existing residential areas.	Redevelopment of existing housing – Opportunities where they exist or can be identified, will be picked up through the update of the Urban Capacity Studies.
Sites in rural settlements and rural exception sites	Smaller areas of Greenfield land outside sustainable settlement boundaries (settlements set out in Annex B) that have potential for housing development. These sites are predominantly to be found within the Suffolk Coastal District Area and will be identified having regard to sites submitted for consideration for allocation in the new LDF Site Specific Allocations.
Greenfield sites	Opportunities where they exist or can be identified will be picked up through the SHLAA.
Urban extensions and new freestanding settlements	There are no freestanding settlements proposed in the RSS for Suffolk, however for both authority areas the options for development could take the form of a significant expansion of one or a number of existing settlements. Any opportunities for urban extensions will be identified by means of sites submitted for consideration for allocation through the relevant DPD.

- 2.6 As noted above, the Councils will, when looking to identify a supply of sites, make use of information on sites submitted by landowners/developers/agents to each Council for possible allocation within the relevant DPD's. Only those sites that are considered well related to a sustainable settlement however will be used.
- 2.7 The assessment will examine sites that are appropriate in scale relative to the level of development planned for at the respective settlement. In addition landscape features such as natural boundaries, ditches, field boundaries, roads and other features will be considered in drawing up areas of search beyond existing sustainable settlement boundaries.

### Stage 3: Desktop review of existing information

- 2.8 Table 4 above outlines the sources of sites with potential for housing, which will be examined as part of the assessment.
- 2.9 It should be noted that all of the sites included in the 2007/08 Urban Capacity Studies will be reviewed and subjected to the same methodology listed in this document. This does not mean that such sites will necessarily proceed for inclusion within the final SHLAA product. Furthermore it should be noted that this study is part of an evidence base and inclusion of sites in this study does not guarantee they will be identified for development. Members of the two respective councils in relation to their Development Plan Documents will make those decisions.
- 2.10 A number of existing sources of information will be reviewed to inform the assessment. It should again be noted that some sources may not be readily available or appropriate for the area covered by the SHLAA, or difficulty may be experienced in finding some sources of supply. The existing sources of information, which will be used, are set out in Table 5 below:

**Table 5: Sources of information (based on dCLG Guidance 2007)**

<b>Sites in the planning process</b>	<b>Purpose</b>
Site allocations not yet the subject of a planning permission.	To identify sites
Planning permissions / sites under construction (particularly those being developed in phases)	To identify sites
Site specific development briefs	To identify sites and any constraints to delivery.
Planning application refusals	To identify sites – particularly those applications rejected on the grounds of pre-maturity or particular site constraints
Dwelling starts and completion records	To identify the current development progress on sites with planning permission
<b>Other sources of information that may help to identify sites</b>	
Suffolk Coastal Urban Capacity Study (April 2008) Ipswich Urban Capacity Study (January 2008)	To identify buildings and land, and any constraints to delivery
Local Planning Authority Empty Property Register	To identify vacant buildings
English House Condition Survey	To identify buildings

<b>Sites in the planning process</b>	<b>Purpose</b>
National Land Use Database	To identify buildings and land, and any constraints to delivery
Register of Surplus Public Sector Land	To identify buildings and land
Suffolk Coastal Employment Land Review Ipswich Employment Land Availability Report (April 2008) Haven Gateway Partnership Employment Land Study Final Report (DTZ, December 2005)	To identify any surplus employment buildings and land
Valuation Office database	To identify vacant buildings.
Local Planning Authority vacant property registers (industrial and commercial)	To identify vacant buildings
Council Tax data base	To identify numbers of vacant dwellings – i.e. unfurnished and empty for a period of 12 months or more. (Parish level only)
Commercial property databases e.g. estate agents and property agents	To identify vacant buildings and land
Ordnance Survey maps	To identify land
Aerial photography	To identify land

- 2.11 All information gathered will be mapped, ideally on a 1:1250 map base for use in the site survey. Any inconsistencies between sources of information will also be resolved, and landowner, developer and agent details will also be recorded for follow up information.
- 2.12 A site assessment checklist will be created for each site, in accordance with Table 6, prior to the site visit and as much information as possible will be entered from a desk-based review of current information held by the two Councils.

## **Stage 4: Determining which sites and areas will be surveyed**

- 2.13 All sites identified by the desktop review will be visited. This will help to resolve any information, which is apparently inconsistent and will help to achieve an up to date view on development progress (e.g. where sites have planning permission) and identify any constraints to development.
- 2.14 The site survey will also identify sites with housing potential, which were not identified through the desktop review. Factors that will be taken into account include:
- The nature of the housing challenge – the assessment will need to be more comprehensive and intensive where existing or emerging housing provision targets in the study area are high and/ or where housing market conditions signal worsening affordability, reflecting the need to identify more sites for housing.
  - The nature of the area - in areas dominated by smaller rural settlements, it may be necessary to identify all the sites with potential for housing, this may not be possible / feasible in more urbanised areas.
  - The nature of land supply – where a large proportion of housing to be delivered is expected on small sites, this may mean that the survey needs to identify smaller sites.

- The resources available to the partnership – resources should reflect the scale of the task.

## **Stage 5: Carrying out the survey**

2.15 While on site the following characteristics will be recorded:

- Site size
- Site boundaries
- Current uses
- Surrounding land uses
- Character of surrounding area
- Physical constraints (e.g. access, topography, flood risk, natural features of significance and location of pylons)
- Development progress
- Initial assessment of whether the site is suitable for housing or housing as part of a mixed-use development.

2.16 The site visit will also be used to identify any further constraints, opportunities, strengths, weaknesses or threats, which may exist on the site. This should provide a clear audit trail.

## **Stage 6: Estimating the housing potential of each site**

2.17 The methodology will use a multiplier approach to assess the housing potential of each of the sites identified in the assessment. The Guidance states that estimates of housing potential should be guided by existing or emerging local plan policy. A mix of factors, including national guidance, current or emerging policies, and monitoring information will therefore guide each authority on densities. In addition, sample site information provided through the viability assessment work carried out in parallel with the Strategic Housing Market Assessment will also be used.

### **Site size thresholds**

2.18 For the number of sites in this study to remain manageable it will be necessary to apply a minimum site threshold. It is proposed to use three different site size thresholds according to location:

- Within IP-One Area Action Plan area – at least 0.1 ha or a capacity of 10 dwellings or more.
- Within towns and outside IP-One Area Action Plan area – at least 0.2 ha or a capacity of 10 dwellings or more.
- Within and abutting rural settlement boundaries – at least 0.2 ha
- Outside town boundaries where major urban expansion is being considered – at least 1.0 ha. Note for settlements identified as 'Major Centres' (SCDC), broad areas of search only will be assessed.

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

2.19 This stage of the assessment examines whether a proposed or identified site is suitable, available and achievable. In accordance with PPS3 sites will be considered as to whether they are:

- **Deliverable** – if a site is available now, offers a suitable location for housing development now and there is a reasonable prospect that housing will be delivered on the site within five years from the adoption of the plan; and
- **Developable** – if the site is in a suitable location for housing development and there is a reasonable prospect that the site will be available and could be developed at a specific point in time.

2.20 Where it is unknown when a site could be developed then it will be regarded as not currently developable.

### Stage 7a-c Suitability, availability and achievability for housing

2.21 A range of information is required in order to assess when and whether a site is likely to come forward for development. To ensure that the assessment is open and transparent sites will be considered against a variety of criteria. The site assessment checklist, which is set out below, seeks to bring together aspects of suitability, availability and achievability.


**Table 6: Site assessment for housing land availability – check list**

Site:

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Stage 7a – Suitability for housing				
Policy restrictions				
Designated/protected area	Internationally or nationally significant e.g. SPA / SSSI	Regionally significant e.g. County Wildlife Site	Locally significant e.g. Conservation Area	No environmental designation
Agricultural land classification	Loss of grade 1 land	Loss of grade 2 land	Loss of grade 3 land	Loss of grade 4 or 5 agricultural land or non agricultural land
Existing use in operation	Importance of existing use, e.g. local employment would prevent housing	Limited scope for housing development alongside existing uses	Potential for mixed use development including housing	No existing use constraints to prevent housing development

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Developable limitations				
Contaminated and Hazardous land	Severe contamination	Some remediation needed	Little remediation needed	No contamination
Flood risk	Within Flood Zone 3b	Within Flood Zone 3a	Within Flood Zone 2	Within Flood Zone 1
Infrastructure – water/drainage/sewerage	Un-serviced site, major capacity constraints	Limited services/some capacity constraints	Fully serviced, minor capacity constraints	Fully serviced, no capacity constraints
Access and Highways (local roads)	Poor highway access, no scope for improvement	Restricted access, significant improvement needed	Adequate access needing only minor improvement	Good highway access, no need for improvements
Access and Highways (trunk roads)	Significant impact on traffic using A14 and associated junctions	Noticeable impact on traffic using A14 and associated junctions	Little impact on traffic using A14 and associated junctions	No impact on traffic using A14 and associated junctions
Potential impacts				
Impact on Landscape and Protected Trees	Detrimental impact on attractive landscape	Limited impact on attractive landscape	Limited impact on poor landscape	Opportunity to improve poor landscape e.g. by new planting
Impact on the Historic Built Environment	In, adjacent to or affecting the setting of a Listed building and/or a Scheduled Ancient Monument and/or a historic park or garden	Within a local listed building, locally listed historic park or garden	Adjacent to or affecting the setting of a locally listed building; locally listed historic park or garden	No impact
Ecology (species rich)	Important site for wildlife, including protected species	Some significant wildlife features and species	Few significant wildlife features and species	Poor site for wildlife and species
Environmental conditions				
Proximity to noise and other pollutants	Significant impact from noise and other pollutants	Noticeable impact from noise and other pollutants	Limited impact from noise and other pollutants	No apparent impact from noise and other pollutants

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Proximity to an Air Quality Management Area (AQMA)	Within an AQMA and mitigation measures required and/or significant potential impact on air quality	Within 400m of an AQMA and/or noticeable potential impact on air quality	Within 800m of an AQMA and/or limited potential impact on air quality	No apparent impact on an AQMA
<b>Access to services</b>				
Local employment opportunities	Poor access to employment	Limited local employment	Reasonable access to employment	Good access to employment
Public transport – bus and or rail service	No bus or rail service	Limited bus or rail service i.e. no journey to work service	Journey to work bus service available	Good bus and or rail service
Potential for creating and/or improving access to services	No potential to create or improve access to services	Limited potential to create or improve access to services	Adequate potential to create or improve access to services	Good potential to create or improve access to services
Cycling and walking opportunities	Poor cycling and walking opportunities, no scope for improvement	Restricted cycling and walking opportunities, significant improvement needed	Adequate cycling and walking opportunities, needing only minor improvement	Good cycling and walking opportunities, no need for improvements
Access to convenience shop(s)	No shop within 800 metres/10 minutes walk in Suffolk Coastal or within 400 metres/5 minutes walk in Ipswich	A village/ local shop within 800 metres/10 minutes walk in Suffolk Coastal or within 400 metres/5 minutes walk in Ipswich	More than one shop within 800 metres/10 minutes walk in Suffolk Coastal or within 400 metres/5 minutes walk in Ipswich	Town centre shops within 800 metres/10 minutes walk in Suffolk Coastal or within 400 metres/5 minutes walk in Ipswich
Access to health centre/doctors' surgery	No facilities within 3 miles in Suffolk Coastal	Facilities within 3 miles in Suffolk Coastal	Facilities within town/village/ Parish in Suffolk Coastal or more than 400 metres/5 minutes walk in Ipswich	Facilities within 800 metres/10 minutes walk in Suffolk Coastal or within 400 metres/5 minutes walk in Ipswich

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Access to primary school	No school within 3 miles	School within 3 miles	School within town/village/ Parish in Suffolk Coastal or more than 400 metres/5 minutes walk in Ipswich	School within 800 metres/10 minutes walk in Suffolk Coastal or within 400 metres/5 minutes walk in Ipswich
Access to a meeting place, e.g. church, hotel with conference facilities, library	No meeting place within 3 miles	Meeting place within 3 miles	Meeting place within town/village/ Parish in Suffolk Coastal or more than 400 metres/5 minutes walk in Ipswich	Meeting place within 800 metres/10 minutes walk in Suffolk Coastal or within 400 metres/5 minutes walk in Ipswich
Access to public open space	No public open space within 800 metres /10 minutes walk	No public open space within 800 metres but opportunity to provide on site	Small area of public open space within 800 metres and opportunity for additional space	Significant area of public open space within 800 metres /10 minutes walk
<b>Stage 7b – Availability for housing</b>				
Availability for housing – difference between availability and site ownership?	Ownership/ legal problems preventing development	Delays to development by ownership constraints	Any ownership/ legal problems can soon be overcome	Controlled by housing developer, intending to develop
Site ownership	Development prevented by unwilling landowner	Ransom strips/ multiple ownership etc. may delay development	Ownership constraints can soon be resolved	No ownership constraints
<b>Stage 7c – Achievability for housing</b>				
Achievability/viability – difference between achievability and market factors	Economic / market factors preventing development	Economic / market factors delaying but not preventing development	Any economic / market problems can soon be overcome	Development is economically viable



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Market factors	Unattractive location / insufficient market demand	Market factors likely to delay development	Only minor delays due to market factors	Attractive location, high market demand
Cost factors	Site constraints make development unviable	Mitigation measures and costs likely to delay development	Additional costs, but not major problems	No unexpected or excessive cost factors
Delivery factors	Developers unable to deliver	Capacity of developer may delay housing	Minor delivery problems e.g. phasing	No delivery problems

Footnote: Sites will be looked at on an individual basis and their cumulative impact. It is also recognised that sites outside AQMA's could have a negative impact on air quality and this would be taken into consideration at the allocations stage.

- 2.22 In order to help assess the viability of each site key stakeholders, including house builders and local property agents will be consulted on a draft list of sites. The viability testing will be a qualitative analysis using the criteria set out in Stage 7c of Table 6, which will suggest if a site is likely or unlikely to be viable based on the information obtained through the SHLAA. Stakeholders will be able to comment on the findings of the assessment.

## Stage 7d: Overcoming constraints

- 2.23 When constraints have been identified the SHLAA will consider what action would be needed to remove the constraints. Actions could include the need for investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to amend planning policy, which is currently constraining housing development.

## Stage 8: Review of the assessment

- 2.24 Once the initial survey of sites and the assessment of the deliverability / developability has been undertaken, the information will be used to produce an indicative housing trajectory, setting out how much housing can be provided, and when. A risk assessment will then be made as to whether sites will come forward as anticipated. In the event that it is concluded that insufficient sites have been identified, then further sites may need to be sought and/or assumptions made e.g. the housing potential of particular sites re-visited. Any decisions made to identify new sites or to re-visit assumptions made will be undertaken jointly by the two participating authorities to maintain a consistent approach.
- 2.25 Should a shortfall of sites be identified, two options will be investigated namely:
- The identification of broad locations for future housing growth, within and outside settlements (stage 9): and / or

- The use of windfall allowance (stage 10)
- 2.26 Again it should be noted that the outcomes of the SHLAA do not give a presumption towards development. Any development site will need to be assessed through the planning process and also be subject to sustainability appraisal.

## **Stage 9: Identifying and assessing the housing potential of broad locations**

- 2.27 Broad locations are areas where housing development is considered feasible and will be encouraged, but where specific sites cannot yet be identified. The advantage is that the community will be clear about where future development will be directed and there will be greater certainty for developers about where development will be encouraged. Examples of broad locations as set out in the Guidance include:
- Within and adjoining settlements – for example, areas where housing development is or could be encouraged, and small extensions to sustainable settlements; and
  - Outside settlements – for example major urban extensions, growth points, growth areas. (It should be noted that no new free-standing settlements or eco-towns are identified for consideration within the Study area at the regional level by the RSS).
- 2.28 Where broad locations have been identified, estimates of potential housing supply will be developed having regard to:
- Any evidence underpinning the Regional Spatial Strategy
  - The nature and scale of potential opportunities within the broad location
  - Market conditions

## **Stage 10: Determining the housing potential of windfall (where justified)**

- 2.29 A windfall site is one, which has not been specifically identified as available in the local plan process. A windfall site is generally taken to mean a previously developed site that has unexpectedly become available.
- 2.30 PPS3 sets a clear expectation that the supply of land for housing should be based upon specific sites, and where necessary, broad locations. PPS3 recognises that there may be genuine local circumstances where a windfall allowance is justified. The disadvantage of relying on a windfall allowance is that it is not clear exactly where development is likely to occur, there is little certainty for communities or developers and estimates make it more difficult to plan for example, making sure the necessary infrastructure is in place.
- 2.31 Where a windfall allowance can be justified, this should be based on an estimate of the amount of housing that could be delivered in the area on land

that has not been identified in the list of deliverable / developable sites, or as part of broad locations for housing development.

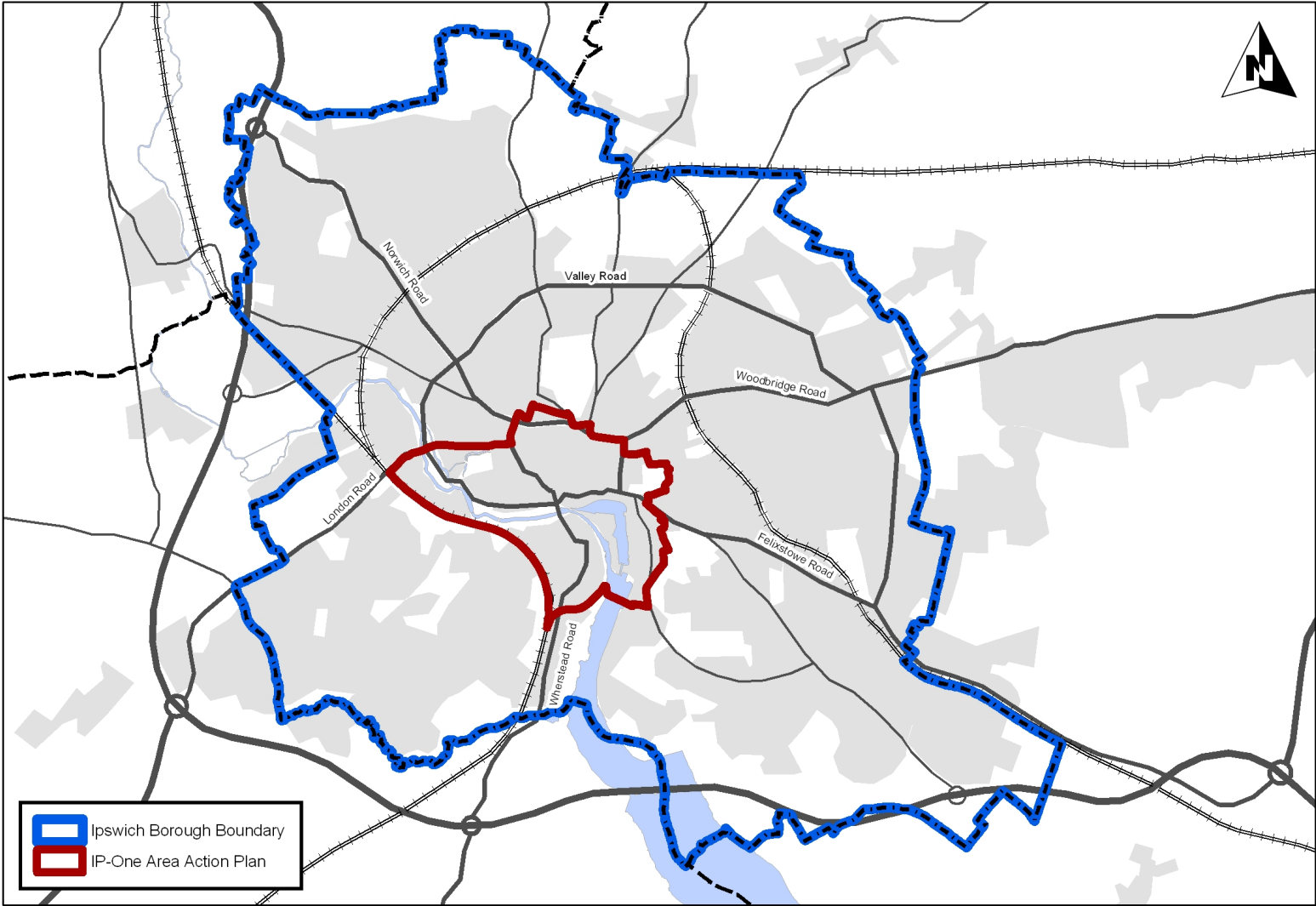
### 3. NEXT STEPS

- 3.1 Consultation with stakeholders on the draft methodology was undertaken in October and November 2008, and comments made were taken on board in revising the methodology. The next steps will be to undertake the survey in accordance with the timetable set out in Table 3 above. There will be a further opportunity to comment on the proposals prior to adoption of the document in 2009.
- 3.2 If you would like more information on the SHLAA or would like to be involved in one of the stakeholder groups please e-mail one of the contacts overleaf.

#### Contacts

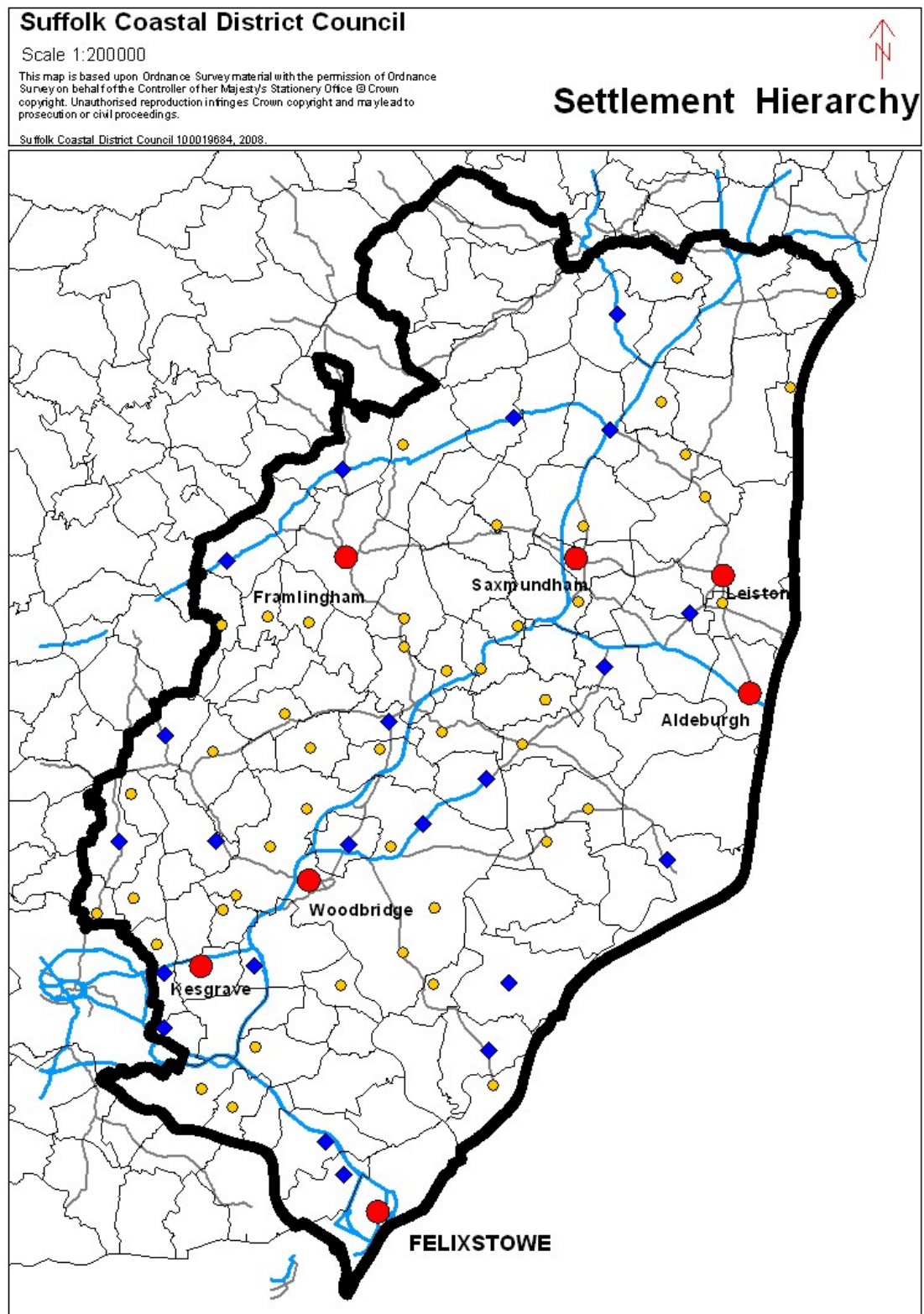
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	Robert.hobbs@ipswich.gov.uk
	01473 432931
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Map 1: Ipswich Study Area



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Map 2: Suffolk Coastal Study Area



## SUSTAINABLE SETTLEMENTS BY COUNCIL AREA

SUFFOLK COASTAL AREA		
Settlement Type	Settlement Name	Acceptable Scale of Development (current/emerging policy)
<b>Major Centre</b>	Felixstowe/Walton	Settlement capable of development for strategic purposes.
	Ipswich Fringe i.e. Kesgrave, Martlesham Heath, Purdis Farm & Rushmere St Andrew (excluding the village)	
<b>Town</b>	Aldeburgh;	Settlements capable of expansion, including estate scale development, where such development would support the role of the settlement, contribute to regeneration and not be detrimental to their character and setting
	Framlingham	
	Leiston	
	Saxmundham	
	Woodbridge (with parts of Melton and Martlesham)	
<b>Key Service Centre</b>  * denotes settlement considered capable of accommodating strategic levels of housing growth	Alderton	Settlements which provide the full range of specified facilities and are capable of sustaining some minor expansion, groups of houses and infilling consistent with their character and setting
	Blythburgh	
	Bramfield	
	Dennington	
	Earl Soham	
	Eyke	
	Grundisburgh	
	Hollesley	
	Kirton	
	Knodishall	
	Martlesham village	
	Melton Village	
	Orford	
	Otley	
	Peasenhall	
	Rendlesham	
	Snape	
	Trimley St Martin*	
	Trimley St Mary*	
	Ufford	
	Westleton	
	Wickham Market	
	Witnesham	
	Yoxford	

Local Service Centre	Aldringham	Settlements providing a smaller range of facilities than the key service centres. Development within these settlements would be confined to, dependent on their individual character, infilling or small groups which address specific local economic, social or community objectives. Also includes settlements that contain a smaller range of facilities but link with neighbouring settlements (as a “cluster”), so as to between them provide for a greater range of facilities and services that go a long way to meeting all day to day needs of the wider locality
	Badingham	
	Bawdsey	
	Benhall	
	Bucklesham	
	Blaxhall	
	Brandeston	
	Bredfield	
	Butley	
	Campsea Ashe	
	Charsfield	
	Chillesford	
	Clopton	
	Cretingham	
	Darsham	
	Dunwich	
	Easton	
	Friston	
	Great Bealings	
	Hacheston	
	Hasketon	
	Kelsale	
	Kettleburgh	
	Little Bealings	
	Little Glemham	
	Marlesford	
	Middleton	
	Nacton	
	Parham	
	Rendham	
	Rushmere St Andrew village	
	Shottisham	
	Stratford St Andrew	
	Sutton	
	Sutton Heath	
	Swilland	
Theberton		
Thorpeness		
Tunstall		
Walberswick		
Waldringfield		
Wenhaston		
Westerfield		

IPSWICH BOROUGH AREA		
Settlement Type	Settlement Name	Acceptable Scale of Development (current/emerging policy)
Key Centre for Development and Change	Ipswich	Key centre for major housing growth.



**SHLAA Stakeholder list**

**Registered Social Landlords and Housing Providers**

Anchor Housing Association  
Anchor Trust  
Anglia Housing Group  
Broadland Housing Association  
Coastal Housing Action Group  
Concern Housing  
Co-op Homes Services  
English Churches Housing Group  
Flagship Housing Group  
Granta Housing Association  
Habinteg Housing Association  
Hanover Housing Association  
Hastoe Housing Association  
Hereward Housing  
Housing 21  
Housing Corporation  
Iceni Homes  
Ipswich YMCA  
Jephson Housing Association  
London & Quadrant Housing Association  
Orbit Housing Group  
Orwell Housing Association  
Presentation Housing Association Ltd  
Raglan Housing Association Ltd  
Richmond Fellowship Housing  
Riverside Housing Group  
Sanctuary Housing Association  
Servite Houses  
Shaftesbury Housing Association  
SOLO Housing  
St Matthew Housing  
Stonham Housing Association  
Suffolk Heritage Housing Association  
Suffolk Housing Society  
Swan Housing Association  
Warden Housing Association  
Wherry Housing Association

**Planning agents/developers/builders**

Associated British Ports  
Adam Holmes Associates  
Alfred McAlpine Developments  
Alsop Verrill  
Andrew Martin Associates  
Apollo Capital Projects  
Ashley Homes  
Ashwell Developments Ltd  
ASP

Atisreal  
Barrett Eastern Counties  
Barton Willmore  
Beazer Homes  
Beeson Properties Ltd  
Bellway Homes  
Bellway Urban Renewal  
Berwicks  
BG Properties  
Bidwells  
Bill Wilson Planning Ltd  
Birketts Solicitors  
Bloor Homes  
Boyer Planning Ltd  
Braceforce Properties  
Brimble, Lea & Partners  
Broadlands  
Broadway Malyan Planning  
Brown & Co  
Bryant Homes Hertford Ltd  
Carter Jonas  
CB Hillier Parker  
CB Richard Ellis  
Charter Partnership  
Chelsteen Homes  
Chris Thomas Ltd  
Churchmanor Estates Company Plc  
Clarke & Simpson  
Crest Nicholson Ltd  
Cushman and Wakefield  
David Clarke & Associates  
David Hicken Associates Ltd  
David Lock Associates  
David Walker Chartered Surveyors  
David Wilson Estates  
Davies Arnold Cooper  
Development Planning & Design Services  
Development Planning Partnership  
D J Trower Ltd  
Don Proctor Planning  
Donaldsons  
Drivers Jonas  
DTZ Consulting and Research  
DTZ Debenham Thorpe  
EWS Chartered Surveyors  
Fairview New Homes Ltd  
Farningham McCreadie Partnership  
Featherstone Builders Ltd  
Firstplan  
FPD Savills  
FRCA  
Fuller Peiser  
G L Hearn Planning  
George Wimpey plc  
Gerald Eve

Gladstone Homes Ltd  
GMA Planning  
Mr Gordon Terry  
Gough Planning Services  
Grantham Parsons and Nolan Ltd  
Greystoke & Everleigh Ltd  
Grove Builders  
Guardian Royal Exchange Properties  
GVA Grimley  
Harris Lamb Planning Consultancy  
Healey & Baker  
Higgins Homes Ltd  
Hopkins Homes  
Indigo Planning  
Ingleton Properties Ltd  
Mr J Martin-Shaw  
J S Bloor  
January's  
JB Planning Associates  
John Field Consultancy  
John Newton Associates  
Jones Lang LaSalle  
Kesgrave Covenant Ltd  
KLH Architects  
Lawson Planning Partnership  
Lennon Planning Ltd  
Level  
Martin Robeson Planning Practice  
McCarthy & Stone Developments Ltd  
Merchant Projects  
Mersea Homes  
Nathaniel Lichfield & Partners  
Neil Ward Associates  
Peacock & Smith  
Peacock Short Property Solutions  
Pegasus Planning Group  
Persimmon Homes (Essex)  
Peter J Hamilton & Associates  
Phillips Planning Services Ltd  
Planning Potential  
Premier Planning  
Pullman Development Ltd  
R G Carter Ipswich Ltd  
Rapleys LLP  
Redrow Homes (Eastern) Ltd  
Robert Turley Associates  
Robottom Developments Ltd  
Roger Tym & Partners  
RPS Chapman Warren  
RPS Planning  
RPS plc  
S Sacker (Claydon) Ltd  
Savills (L&P) Ltd  
Smart Planning Ltd  
Taylor Wimpey Developments

Terence O'Rourke Planning  
Tetlow King Planning  
The Fairfield Partnership  
The Landscape Partnership  
The National Trust  
The Planning Bureau Ltd  
Tomlinson Construction  
Town Planning Consultancy  
W S Atkins  
W S Development  
Wates Landmark  
West and Partners  
Wharfside Regeneration (Ipswich Ltd)  
White Young Green Planning  
Wilcon Homes Anglia Ltd  
Wilson Connelly Home Counties  
Wimborne Estates Ltd  
Wimpey Homes  
Wincer Kievenaar Partnership

**Planning authorities**

Babergh District Council  
Mid Suffolk District Council  
Waveney District Council

**Other stakeholders**

Anglian Telecom plc  
Anglian Water Services Ltd  
British Energy Group plc  
British Gas  
BT Group plc  
Coal Authority  
COLT Telecom Group plc  
Defence Estates  
E.On UK plc  
East of England Development Agency (EEDA)  
East of England Regional Assembly (EERA)  
East of England Strategic Health Authority  
Easynet Ltd  
EDF Energy  
English Heritage  
Environment Agency  
Equant UK Ltd  
Essex and Suffolk Water Company  
Fibrenet Group plc  
Fibrespan Ltd  
Friends, Families & Travellers Community Base  
Fujitsu Services  
Gamma Telecom  
Global Crossing (UK) Telecommunications Ltd  
GO-East  
Highways Agency  
Home Builders Federation  
Hutchinson 3G UK Ltd  
Internet-Central Ltd

Ipswich NHS Trust  
Ipswich Primary Care Trust  
Level 3 Communications  
Local Health Partnerships NHS Trust  
MCI WorldCom Ltd  
MLL Telecom Ltd  
Mobile Operators Association  
National Grid  
National Housing Federation  
National Power plc  
National Trust  
Natural England  
NEOS Networks  
Network Rail  
Newnet plc  
NHS  
Norfolk, Suffolk & Cambridgeshire Strategic Health Authority  
NTL UK  
Nuclear Electric plc  
O2 Airwave  
Opal Telecom  
Orange  
Pipex  
Powergen Retail Ltd  
Reach Europe  
Redstone  
Shelter  
Sport England  
SSE Telecom  
Suffolk Biodiversity Partnership  
Suffolk Coastal Primary Care Trust  
Suffolk County Council  
Suffolk East Primary Care Trust  
Suffolk Health Authority  
Suffolk Mental Health Partnership NHS Trust  
Suffolk Primary Care Trust  
Suffolk Police  
THUS plc  
T-Mobile (UK) Ltd  
Torch Communications Ltd  
Transco East Anglia  
UK Broadband Ltd  
Vectone Services Ltd  
Vodafone Ltd

Consultation comments and council responses			
Consultee	Section of Document	Comments	Ipswich and Suffolk Coastal response
Anglian Water	General	Recommend that any sites chosen through the SHLAA criteria should then be tested for appropriateness using the Haven Gateway Water Cycle Study to check for environmental constraints and advise on infrastructure needs and suitable timing for the development.	Noted.
Barton Willmore	Stage 7, Table 6.	Table 6 states that greenfield sites and sites with major policy constraints should be marked as - -. Given the shift in emphasis from PPG3 to PPS3 with the dropping of the sequential test in PPS3 do not consider that housing sites should be penalised because they do not conform to current local plan policy, for example if they are outside the development boundary and therefore greenfield. The LDF can where appropriate allocate such sites for development, and so the SHLAA should look forward to identify appropriate housing sites, and should not be constrained by existing policy. A suitable greenfield site should be scored +.	Noted. Have deleted this row from Table 6 and the scoring criteria in accordance with Planning Advisory Service guidance.
Barton Willmore	Stage 7, Table 6.	A suitable greenfield site could be more appropriate to develop than a brownfield site, and in the scoring system for Suitability for housing and Previously developed land or brownfield, sustainable greenfield sites should score higher. Propose that the scoring system should be amended to better recognise the benefits of developing sustainable greenfield sites.	Noted. Have deleted reference to previously developed land (PDL) or greenfield site from Table 6, as this would be a subsequent policy decision, and have deleted the scoring criteria in accordance with Planning Advisory Service guidance.

Barton Willmore	Para 2.26 (now para 2.25)	Para 2.26 (now para 2.25) of the councils SHLAA methodology states that should a shortfall of sites be identified then broad locations for growth should be identified or a windfall allowance should be investigated. Paragraph 43 of the Communities and Local Government Strategic Housing Land Availability Assessment Practice Guidance, states that when the Assessment is reviewed "it may be concluded that insufficient sites have been identified and that further sites need to be sought." This implies that broad locations for growth and windfall allowances should not be the only way of addressing a housing shortfall if specific sites are available to provide a housing supply for the full 15 years of a plan.	Noted. Guidance from the Planning Advisory Service states: "possible broad locations should be assessed in the same way as identifiable sites so as to provide a rounded assessment of potential sources of supply, with consistent information on deliverability / developability."
Boyer Planning	General	Support the general methodology, as it would seem consistent with the Practice Guidance.	Noted.
Boyer Planning	Stage 1	The local planning authorities need to be certain that the methodology and assessment of sites identified within the SHLAA provide a degree of certainty as to its findings.	Noted, this will be achieved through stakeholder engagement.
Boyer Planning	Stage 2 & 3	The purpose of the SHLAA is to identify sites capable of being delivered for housing and the development of sites, such as vacant garage blocks and other incidental areas of vacant urban land, tend to come forward as opportunities rather part of any forward planning process.	Disagree. We will include brownfield sites such as vacant garage blocks where we know there is potential for them to be redeveloped in the future for housing.
Boyer Planning	Stage 2 & 3	Insofar as reviewing existing information is concerned, it will be important to have regard to sites that might be identified for other possible uses.	Noted, some sites identified for other uses have been included in the study.
Boyer Planning	Stage 4	The Practice Guidance is quite clear that the SHLAA is to exclude windfall sites until very much later in the process. The site threshold as identified in paragraph 2.19 (now para 2.18) should be adhered to.	Noted. The site size threshold will be adhered to.

Boyer Planning	Stage 5	We assume that all the characteristics listed within para 2.16 (now para 2.15) will be set out clearly in the SHLAA consultation document to allow such details to be verified.	Correct.
Boyer Planning	Stage 6	The same situation applies in respect of this stage that developers and landowners will have the opportunity to respond to the housing potential of individual sites. Such potential will depend on a range of factors including market demand and viability of proposals.	Agree.
Boyer Planning	Stage 7	Verifying the conclusions and information contained within Stages 5, 6 and 7 of the SHLAA will need the crucial input of developers and landowners and for such inputs to be given considerable weight.	Stakeholder consultation is planned on the draft report.
Boyer Planning	Stage 7, Table 6	The SHLAA document is intended to identify potential housing land and the Practice Guidance does not seek to differentiate between greenfield sites and previously developed land. Accordingly, that a site may be constrained either because it is greenfield or previously developed land is not relevant and should be deleted as a key issue from Table 6. Whether or not a site is greenfield or previously developed land is not a measure of constraint in itself other than where previously developed land is the subject of contamination or other physical constraints.	Noted and have deleted this row from Table 6.
Boyer Planning	Stage 7, Table 6	Correctly flood risk is identified as a key issue in identifying future housing sites. However there is an error in the Flood Risk Key Issue in that Flood Zone 3b comprises functional flood plain whereas Flood Zone 3a in certain circumstances can be considered appropriate for housing development. Sites in Flood Zone 3b are therefore more constrained.	Noted, document corrected.



Boyer Planning	Stage 8	Noted at para 2.25 (now para 2.24) that identifying new sites or re-visting assumptions made within the SHLAA will be undertaken by the two local planning authorities. It is crucial for those who have an interest in providing housing development within the area should be included as part of the process to ensure that full information has been made available to the local planning authorities.	Noted, stakeholders have the opportunity to be involved through consultation on the draft report.
Boyer Planning	Stage 9	It is acknowledged that the local planning authorities should take a lead in identifying broad locations for housing development within their respective areas. However the identification of such locations should have full regard to the availability of land for housing which can be developed in such areas and in that regard consultation with landowners and developers should form part of the process.	Noted. The two councils have consulted on the methodology and will consult again on the draft report.
Boyer Planning	Stage 10	Should the SHLAA require the need to rely on a windfall contribution then that needs to have regard to market considerations. Past take-up rates of windfall sites may not necessarily continue into the future. It will be a matter for consultation and assessment at that time.	Noted.
The Coal Authority	General	No specific comments to make.	No response necessary.

David Lock Associates	General	Fundamental concern that the timing of preparation of the SHLAA undermines the robustness and soundness of the emerging Ipswich LDF, on the basis that the SHLAA will not be finalised until consultation on the next stage of the DPD production process has commenced, and that previous stages of relevant DPDs will not have been adequately informed by the SHLAA.	Draft findings will be in place prior to consultation on the emerging LDF.
David Lock Associates	General	Concerned that the proposed methodology allows policy to influence the identification and assessment of sites, rather than being a technical exercise only. This is contrary to guidance on the preparation of SHLAAs.	Agree the SHLAA is a technical exercise only although the objective of maximising brownfield development continues. Have deleted reference to previously developed land (PDL) or greenfield site from Table 6, as this would be a subsequent policy decision.
David Lock Associates	General	Concerned that the proposed methodology fails to provide a robust basis for assessment in that it fails to recognise the potential for new services to be delivered in support of new development locations.	Agree larger sites have the potential to deliver new services, however this is an additional cost to the delivery of the site and first of all it is important to assess proximity to existing local services. Have added a row to Table 6 focusing on the potential for creating and/or improving access to services.
David Lock Associates	General	Concerned that inadequate consultation may mean that inadequacies in the identification and assessment of sites may not be apparent until conclusion of the SHLAA.	The two councils invited comments from a range of stakeholders and further consultation will take place once site assessments have been carried out.
David Lock Associates	Stage 2	Wish to be reassured that there is continuity between the Ipswich urban capacity study and the SHLAA and that no potential sites on the urban fringe could fall between these two definitions.	Noted. Where known, sites on the urban fringe of Ipswich have been included in the SHLAA. The list of sites was also consulted on alongside the methodology.
David Lock Associates	Stage 2	Advice published by the Planning Advisory Service explicitly explains that potential opposition to greenfield sites does not represent a reason for not identifying such sites as a potential source of land.	Agree. Greenfield sites are included in the SHLAA.

David Lock Associates	Stage 2	In referring to emerging LDF documents as a consideration in the identification of sites, it is suggested that the necessary policy neutrality set out in guidance is not being upheld. It would clearly be prejudicial to the findings of the assessment if emerging LDF policy were to influence the identification or assessment of the suitability of sites.	Agree, the SHLAA is a technical exercise, however guidance also clearly states that where sites have been considered in a local authority's preferred options, then they should be included in the SHLAA.
David Lock Associates	Stage 2	Concerns about policy impartiality relevant in relation to para 2.6 of the proposed assessment methodology. It is not clear how exactly the criteria or provisions of the last sentence of that paragraph will be determined or applied, although it is clear that the implication is that some degree of judgement will be applied to potential sites before they can be included as a potential source. With reference to para 21 of the Practice Guidance, would recommend that any suggestion of pre-determination of the suitability of sites must be avoided, and recommend the last sentence of this paragraph is removed.	Amend. To more properly accord with national guidance on this issue, the words "and of a scale appropriate" will be deleted.
David Lock Associates	Stage 6	The Practice Guidance includes advice at para 30 to help local authorities determine whether it is appropriate to use existing policies as a guide to inform site design variables (such as on density), which in turn informs capacity. Para 2.18 (now para 2.17) of the proposed methodology makes no reference to the appraisal of the suitability of existing policy. Recommend the proposed methodology be amended to recognise that existing emerging policy may not provide sufficient guidance for assessing the development capacity of sites, and that consideration must therefore be given to alternative means of assessing site capacities.	Noted, para 2.18 (now para 2.17) will be clarified making reference to the fact that when assessing densities a mix of factors will be used including national guidance, emerging policy and sample site information provided through the viability assessment work carried out in parallel with the Strategic Housing Market Assessment.

David Lock Associates	Stage 7	Recommend that the title of the 'policy restrictions' subsection in Table 6 refer only to existing policy, and not to 'emerging' policy.	Reference to emerging policy deleted.
David Lock Associates	Stage 7	Practice Guidance refers to specific policy considerations such as designations for protected areas, existing allocations or community policy, not to constraint policies. Suggest that the robustness of the SHLAA and any dependent plan policy is predicated on a fair and policy neutral approach to assessing sites, and that those policies to be used are set out clearly.	Noted. Methodology sets out such an approach.
David Lock Associates	Stage 7	Suggest that a priority afforded to previously developed land is a matter of policy, to be applied when allocating sites and that suitability is a matter of technical assessment for which PDL is not a relevant consideration.	Noted. Have deleted reference to previously developed land (PDL) or greenfield site from scoring assessment.
David Lock Associates	Stage 7	Recommend that the SHLAA methodology recognises both proximity to existing services, and the potential for delivering new services, as part of its evaluation of sites.	Noted. Agree larger sites have the potential to deliver new services, however this is an additional cost to the delivery of the site and first of all it is important to assess proximity to existing local services.
David Lock Associates	Stage 7	Need for community engagement to ensure the robustness of assessments.	Noted. Consultation will be carried out on the draft report.
David Lock Associates	Stages 8, 9 & 10	Would remind the authorities that the circumstances by which individual sites cannot be identified must be on a technical basis, rather than a policy basis.	Noted. Sites have been identified on a technical basis.
East of England Regional Assembly		Ipswich Borough Council and Suffolk Coastal District Council are commended for working together to develop this SHLAA methodology for the Ipswich Policy Area. The Assembly fully supports this approach.	Noted.

Environment Agency	General	The methodology outlined in the SHLAA document appears to conform to the government guidance and therefore no specific comments are to be made, except for three items: the site assessment form; the consultation process; and sustainable settlements.	Noted.
Environment Agency	Stage 7, Table 6	The site assessment form seems to take a broad-brush approach, arguably a simplistic approach. For instance, in relation to ecology it merely asks for species rich attributes. What about impacts on adjacent land or located where development could significantly affect a SSSI / national nature reserve? Does the site include or significantly affect any other site of local importance such as local wildlife site, ancient woodland and protected verge or affect protected habitat or species (if known)? Consider the need to set out a more detailed approach in order to capture full information.	Potential for cumulative impact effect as part of the assessment / and use made of sustainability appraisals already carried out. Footnote added to the site assessment checklist table: "Sites will be looked at on individual basis and their cumulative impact." Amended ecology row in Table 6.
Environment Agency	Stage 7, Table 6	Taking flood risk, it would be preferable if the landowner / developer was asked to indicate which flood zone the site lies in, i.e. Flood Zone 1, 2 or 3. The information is available on the Environment Agency Flood Maps on the Environment Agency website.	The councils already have this information along with the Strategic Flood Risk Assessment.
Environment Agency	Stage 7, Table 6	Regarding contaminated and hazardous land, ask the landowner / developer to advise whether the site falls within a groundwater source protection zone.	Both councils hold or have access to this information.
Environment Agency	Stage 7, Table 6	Would the site impact on an air quality management area (AQMA)?	Both councils hold or have access to this information, but have added a row in Table 6.
Environment Agency	Stage 7, Table 6	Does the site impact on the historic, cultural and built environment?	Both councils hold or have access to this information, but have added a row in Table 6.

Environment Agency	Consultation process	May be worthwhile having a panel of key stakeholders, including the statutory environmental bodies, who would consider and give advice and opinions on the draft SHLAA prior to its consideration and approval by the Councils. The panel membership could comprise LPA policy planners/engineers, volume house builders, small scale builders, land agents, planning consultants, registered social landlords involved in new build projects.	The two councils invited comments from a range of stakeholders on the methodology and site list, and further consultation will take place once site assessments have been carried out.
Environment Agency	Sustainable settlements	Purdis Heath is included as a major centre. It seems a bit too fragmented to justify meeting the description of a major centre.	Purdis Farm is part of a wider eastwards extension of Ipswich and is urban in character.
Highways Agency	Stage 7, Table 6	Table 6: Access & Highway: A significant amount of traffic emanating from Ipswich (and a lesser amount from Felixstowe) uses the A14 as a distributor route. Recent work by Suffolk County Council indicate that through traffic crossing the Orwell Bridge is only about 20% of total traffic. With concerns on the future capacity of the A14, there is a need to manage down demand. Consequently it is suggested that Access & Highway is split into local and trunk road segments with the trunk element based on an assessment of likelihood to use the A14 or possibly proximity to A14 junctions.	The Access and Highways criteria will be divided into two, with one focusing on the impact on the local road network and the other focusing on the impact on the trunk network.
Highways Agency	Stage 7, Table 6	Table 6: Access to Services: There is an option which picks up public transport, however there is no clear assessment of the opportunity for sustainable transport, i.e. opportunities not to use the car, opportunities for cycling, walking etc. This assessment is essential if future demand levels for transport are going to be effectively managed.	Noted. An additional row will be added assessing cycling and walking opportunities.

Merchant Projects	Stage 2	Urban extensions are a separate category of source, ensure continuity between the urban capacity study and the SHLAA and that no potential sites on the urban fringe (which may or may not constitute urban extensions) are excluded from consideration.	Noted. Where known, sites on the urban fringe of Ipswich as well as other towns have been included in the SHLAA and a list of sites was consulted on.
Merchant Projects	Stage 2	It would clearly be prejudicial to the findings of the assessment if emerging LDF policy was to influence the identification or assessment of the suitability of sites and the last row of Table 4 on page 9 is unfairly influenced by existing policies. Suggest the final sentence of this row is deleted.	Amend. Final sentence to be amended to read: "Any opportunities for urban extensions will be identified by means of sites submitted for consideration for allocation through the relevant DPD".
Merchant Projects	Stage 2	Suggest that any suggestion of the pre-determination of the suitability of sites must be avoided, and strongly recommend that the last sentence of para 2.6 is removed.	Amend. To more properly accord with national guidance on this issue, the words "and of a scale appropriate" will be deleted from para 2.6.
Merchant Projects	Stage 6	Suggest that the proposed methodology be amended to recognise that existing and emerging policy may not provide sufficient guidance for assessing the development capacity of sites, and that consideration must therefore be given to alternative means of assessing sites and site capacities, and in addition the issue of viability is adequately addressed particularly in the current economic cycle.	Noted, para 2.18 (now para 2.17) will be clarified making reference to the fact that when assessing densities a mix of factors will be used including national guidance, emerging policy and sample site information provided through the viability assessment work carried out in parallel with the Strategic Housing Market Assessment.
Merchant Projects	Stage 7	The Practice Guidance makes it clear that policies designed to constrain development must be regarded with considerable caution and emerging LDF policies that predate the SHLAA and are restrictive in nature should clearly be disregarded. Table 6 should consequentially be amended to give clarity on this issue.	Noted. Reference to emerging policy deleted.
Merchant Projects	Stage 7	Previously developed land PDL should not be criteria for selection, it is used to prioritise allocation not selection of suitable sites.	Noted. Have deleted reference to previously developed land (PDL) or greenfield site from Table 6.

Merchant Projects	Stage 7	Expect those sites subject to flood risk to be considered unsuitable for development when assessed through SHLAA.	Disagree, as with flood adaptation and mitigation measures in place, sites subject to an element of flood risk can be considered suitable for development.
Merchant Projects	Stage 7	Wrong to use the presence of local services as a determinant in selecting suitable sites. Suggest that the SHLAA methodology recognises both proximity to existing services, and the potential for delivering new services, as part of its evaluation of sites.	Noted. Agree larger sites have the potential to deliver new services, however this is an additional cost to the delivery of the site and first of all it is important to assess proximity to existing local services. Have added a row to Table 6 focusing on the potential for creating and/or improving access to services.
Merchant Projects	Stage 7	Suggest the viability assessment methodologies used for the SHLAA and SHMA should be compatible to allow comparison and consistency.	Agree.
Merchant Projects	Stage 7	Given the technical nature of many of the judgements required in respect of the criteria in Table 6, would suggest that developers be given an opportunity to advise the authorities in respect of specific sites, and suggest that the conclusions of the assessment be published for fact-checking before the SHLAA relies on the conclusions of the appraisals.	Agree. Developers and landowners have the option to complete the site assessment form available on each authority's website. Further consultation will take place once site assessments have been carried out. The councils also have data submitted with representations on the LDF from objectors.
Merchant Projects	Stages 8, 9 and the full 15 year supply	It is important that the preceding stages of the assessment have not included a bias which precludes certain types of site (for example, greenfield sites capable of delivering a new network of facilities and services) being taken forward to Stage 8. The circumstances by which individual sites cannot be identified must be considered on a technical, rather than a policy, basis. Windfall sites are clearly that and play no part in assessing the 15-year supply.	There is no bias as greenfield and brownfield sites are considered on an equal footing. The SHLAA is a piece of technical work to inform subsequent policy decisions.
Nathaniel Lichfield and Partners	General	As the methodology accords with the SHLAA Practice Guidance published in July 2007, are satisfied with the approach.	Noted.



Natural England	Stage 7, Table 6	In Table 6, under 'Developable limitations', 'Designated/protected area' is listed as one of the key issues. In addition to including whether or not a site falls within a designated/protected area, it should also be considered whether the development of a site would cause an indirect impact on designated/protected areas, through, for example, water resource/quality issues, increased recreational pressure.	Potential for cumulative impact effect as part of the assessment / and use made of sustainability appraisals already carried out. Footnote added to the site assessment checklist table: "Sites will be looked at on an individual basis and their cumulative impact."
Sport England	General	Wish to confirm its opposition to the potential allocation of any existing or former sports facilities for new housing development unless it could be demonstrated to their satisfaction that there was no longer a need to retain sites for sports use or satisfactory replacement provision was made. Sport England would only accept a site being surplus to requirements if it could be satisfactorily demonstrated that there is a surplus of facilities through an up-to-date sports facility assessment or playing pitch assessment prepared in accordance with the guidance set out in PPG17. This applies to both existing and former sites because former sports sites offer the potential to be brought back into use to meet current or future unmet needs.	Noted. There is an existing use in operation row in Table 6.
Sport England	General	In terms of the SHLAA Methodology, Sport England would encourage the existing or potential role of a site in meeting sports facility needs to be a material consideration when deciding which sites to progress to allocations.	Noted. This will be a policy decision rather than one affecting the developability of the land.