

Babergh District Council

Strategic Housing Land Availability Assessment Final Report

June 2009

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Babergh District Council Strategic Housing Land Availability Assessment (SHLAA) Report

1. Introduction

The Strategic Housing Land Availability Assessment provides a list of potential sites that may be suitable and available for housing development. It is a background evidence document, required by Government policy, to show that sufficient housing land can be provided for a 15 year period. It does not select sites for development or make decisions about future housing allocations. These decisions will be made in Development Plan Documents, which are subject to full consultation and consideration of other evidence, such as Sustainability Appraisals. Not all of the sites made available will be needed and it is likely that only a proportion of sites will eventually be allocated. In addition further opportunities for site submissions will be provided as part of the Site Specific Allocations document.

1.1 A Government priority is to ensure that housing land supply is not a constraint to the delivery of new homes. Their policy stance is outlined in Planning Policy Statement 3: Housing. Local planning authorities are required to continually assess potential housing land supply through, for example, Urban Capacity Studies and monitoring the implementation of planning permissions. The Government is now promoting Strategic Housing Land Availability Assessments (SHLAA), as a means of widening the geographical search for specific sites and to consider supply over a longer time-frame.

1.2 Specifically, guidance issued by the Government states that a SHLAA should:

- identify specific sites for the first 5 years of a development plan, that are available for development and that can be delivered;
- identify specific developable sites for 6-10 years, and ideally up to 15 years in plans, to allow the 5 year housing land supply to be continuously topped up;
- where it is not possible to identify specific sites for years 11-15 of the plan, to indicate broad locations for future growth.

1.3 The DCLG (July, 2007) advocate partnership working when undertaking a SHLAA to ensure a joined up and robust approach. This is a report on the SHLAA that has been produced by **Babergh District Council** in partnership with three other adjoining Local Planning Authority areas, namely Mid Suffolk District Council, Forest Heath District Council and St Edmundsbury Borough Council (see map at Appendix 1 for an illustration of the combined housing market area under assessment). However, this report focuses on the outcomes of the SHLAA of relevance to **Babergh District Council** only. The other authorities will be producing their own reports.

1.4 As technical evidence the SHLAA will contribute to the preparation of the Babergh Local Development Framework Core Strategy by helping to establish whether or not sufficient land is potentially available to achieve the levels of growth proposed for the district by the Regional Spatial Strategy. Specific sites selected for inclusion in the SHLAA will then be considered for in the council's site allocations development plan document, anticipated to start during 2010.

1.5 It should be noted that the outcomes of the SHLAA **do not give a presumption** towards development and any development site will need to be assessed through the planning process, for example, whether it complies with the Council's Core Strategy DPD, the Site Specific Allocations DPD process, and also be subject to sustainability appraisals. This includes aspects such as considering the visual impact, impacts on wildlife, more detailed assessments of highway implications, the relationship of the services and facilities, etc.

1.6 The SHLAA gives a picture of potential housing land supply at a specific date, but it will be regularly monitored and reviewed as sites become available or are taken out of the pool of sites. **Babergh District Council** is required to demonstrate, on an on-going basis, that a 5 year supply of land is available for housing. The sites identified as part of the SHLAA process can therefore be used to top up this 5 year land supply.

2. Regional Spatial Strategy Background

2.1 The East of England Plan puts forward the following minimum housing targets for the participating authorities between 2001 and 2021:

Table 1: RSS Housing Proposals 2001-2021	
Planning Area	Proposed Dwellings (net)
Babergh District	5,600
Forest Heath District	6,400
Mid Suffolk District	8,300
St Edmundsbury Borough	10,000

3. Babergh District Housing Requirements

3.1 In order to monitor how the delivery of the RSS is being met in relation to Babergh a simple calculation has been undertaken as follows;

Table 2: RSS and Babergh Housing Requirements	
East of England Plan housing requirement	5,600
Minus housing completions to date (up to April 2008)	1,871
Residual total	3729
Divided by remaining years of the Development Plan (13)	287 dwellings per annum

3.2 The table below provides an update on housing requirements compared with the RSS requirements. It removes an allowance for rural windfall housing, in accordance with PPS3, but includes the housing allocated in the Adopted Local Plan, Alteration No 2 (2006) as well as sites where the principle of residential development is established.

Table 3: Babergh District Housing Requirements
(a) Commitments at 31/3/08 (planning permissions) considered in the 5 year housing supply statement (including allocations in previous local plan)

Total Babergh District	732
(b) Remaining allocated sites in the Babergh Local Plan, Alteration No 2 (2006)	
Total Babergh District	1739
(c) Other development potential (planning principle established by previous applications)	
Total Babergh District	635
Total (a) + (b) + (c) =	2946

3.3 Based on the East of England Plan requirement of 280 dwellings per annum, this figure would provide for 10.5 years of housing land. However, if the residual requirement for the remainder of the regional plan period is taken into account, having regard to the amount of housing already completed, the figure would provide 10.3 years supply of housing.

4. SHLAA methodology and Housing Market Partnership involvement

4.1 A jointly produced methodology for undertaking the SHLAA was written in accordance with the 'Strategic Housing Land Availability Assessments Practice Guidance' (DCLG, July 2007). The methodology demonstrates that the councils have followed the approach outlined in Section Two of the guidance to ensure that the Assessment was robustly and transparently prepared.

4.2 The DCLG guidance on undertaking SHLAAs advocates a partnership approach and that key stakeholders with local knowledge should be involved at the outset of the Assessment and can help to shape the approach taken. These partners or 'Housing Market Partnership' are identified at Appendix 2 and were consulted on the proposed methodology for the SHLAA in June 2008, to ensure it constituted a sufficiently robust framework. The Housing Market Partnership includes Suffolk County Council, Registered Social Landlords (RSLs), agents, developers and the builders themselves. Whilst The Home Builders Federation responded to the methodology consultation no input to the SHLAA beyond this was received due to lack of resources in the eastern region. The Government Office for Eastern England was made aware of this. Eight Housing Market Partnership stakeholders responded to the methodology and these responses are attached at Appendix 3 for information. The council's responses to the Housing Market Partnership comments were reported back to the Housing Market Partnership prior to undertaking the Assessment and are also attached at Appendix 3.

4.3 The first Housing Market Partnership meeting took place in September 2008. A list of attendees is attached at Appendix 4. The meetings were not attended by the same individuals each time, due to time commitments, availability and specific interests in certain areas, but a range of individuals and organisations with development or local site expertise were invited. The first meeting introduced the SHLAA process to Housing Market Partnership, considered the responses to the consultation on the methodology and agreed the remit for undertaking site assessments.

4.4 The second Housing Market Partnership meetings took place in November/December 2008 after site assessments had taken place (list of attendees at Appendix 4). Separate meetings took place to consider the St Edmundsbury and Mid Suffolk sites and the Forest

Heath and Babergh Sites. Submitted and identified sites were considered and comments were invited from the Housing Market Partnership on suitability, availability and developability.

4.5 A statement of representations made by the Housing Market Partnership stakeholders on the final draft SHLAA report in May 2009, together with the Council's recommendations, can be found at Appendix 8.

5. The SHLAA process

5.1 Many of the sites included in the SHLAA have previously been identified through previous Urban Capacity Studies, Local Plan allocations or commitments. These known sites were supplemented through two calls for sites in June 2008 and in September 2008, inviting landowners, agents and developers to submit sites for potential development. Only sites over 0.2 ha or those proposing 5 dwellings or more were considered. Sites smaller than this were not considered appropriate for the purposes of this study but may come forward as windfall sites. Babergh District Council received a limited amount of site submissions and therefore additional sites in accordance with the DCLG guidance were identified in villages well served in terms of services and facilities but that are not particularly constraint by national conservation or wildlife designations. The Council contacted landowners of the additional sites that were considered potentially suitable for residential development during February 2009 to determine if these sites are available for residential development.

5.2 There was some duplication of sites as the same areas of land have in some cases been promoted by different developers/landowners/agents. Any areas of duplication were removed during the site sieving process.

5.3 As a starting point, all of the identified sites were mapped and site visits were undertaken to record detailed site information. A copy of the site appraisal form used to record information is attached at Appendix 5.

5.4 All of the site information was entered into a site database, which will be updated regularly as information becomes available, to ensure that the SHLAA provides an up to date record of housing land supply as recommended in SHLAA practice guidance (DCLG, July 2007).

5.5 A total of 244 sites were identified in the Babergh area, covering approximately 860 hectares of land. If a crude indicative density figure is used at 30 dwellings per hectare, these sites could potentially deliver 25,800 dwellings.

5.6 As previously mentioned, submitted and identified sites were brought forward for discussion at the second Housing Market Partnership meeting on the 10th of December 2008. A list of Housing Market Partnership stakeholders present at this meeting is attached at Appendix 4. Comments received from the Housing Market Partnership were used to assist officers in the site sieving process, which is outlined below.

6. Deferring sites

6.1 In accordance with the SHLAA practice guidance a system of site sieving was undertaken in order to identify those sites that offer realistic opportunity in terms of suitability, availability and developability. The system devised undertook a two stage filtering process deferring sites at two stages, which is outlined in more detail below.

6.2 Practice guidance states that the assessment of constraints is inherently judgmental and therefore it is important that this takes place only once the unconstrained capacity has been identified. It also states that based upon the experience of previous studies it is clear that in reality, following the assessment of constraints on sites, assessments are likely to find that the unconstrained figure is reduced quite substantially, in some cases by up to 50% or 60%. That is, out of the full range of sites and opportunities identified early on in the assessment, a much smaller number are likely to offer a realistic prospect for housing development.

6.3 For those sites that have been deferred for the purposes of the SHLAA it should be considered that these sites may still come forward through the development process if they can overcome any constraints such as flooding or ownership issues.

6.4 The SHLAA needs to look at the practicality of the sites in question, as to whether they are likely to be able to deliver houses at all, and if so, in what realistic time frame. The Guidance states that in order for sites to be developable they must be:

- **Suitable (potentially)** - the site offers a potentially suitable location for housing development and would contribute to the creation of sustainable mixed communities.
- **Available** - a site is considered available for development when, on the best information available, there is confidence that there are no legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements or landowners. This means that it is controlled by a housing developer, or the land owner has expressed an intention to sell.
- **Achievable** - there is a reasonable prospect that housing will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site and the ability of the developer to complete the housing over a particular time period.

6.5 For those sites that have been put forward by developers, assumptions can be made about the landowner's attitude to development. However for sites identified solely as a result of previous Urban Capacity Studies, information regarding land ownership and attitude to development has not been so straight-forward to ascertain.

6.6 All of the 244 sites were assessed by officers, in view of comments received from Housing Market Partnership, for their suitability, availability and achievability. The sites were considered against a number of **known** constraints such as flooding and nature designations. If it was felt that a particular constraint on development could not realistically be overcome, it was deferred for the purposes of the SHLAA and estimating the District's housing potential at this stage.

Stage 1 sites

6.7 It was considered appropriate to introduce a two stage filtering process to assist with deferring of inappropriate sites. A site assessment sheet was devised to assist officers in assessing the suitability of sites for inclusion in the SHLAA (Appendix 5). This sheet was used when visiting all of the SHLAA sites. A deferred site sheet was devised for Stage 1 only and it took into account physical constraints that would render sites unsuitable for housing. The reasons for deferring sites at stage 1 are outlined in the table below, which is repeated in Appendix 6 for reference;

Table 4: Stage 1 sites deferred

Stage 1 sites, reasons for deferring	Explanation
Size	The site is below the 0.2 ha or 5 dwelling threshold set for the SHLAA
Flood Zone	At least 50% of site is within Flood Zone 2 or 3 which cannot be mitigated against rendering the site unsuitable for development
Contamination	High levels of contamination that make site unsuitable for housing
Conservation/Wildlife	National conservation or wildlife designation that cannot be mitigated

6.8 For the purpose of the SHLAA, no further work into establishing the developability of these sites deferred at stage 1 has been undertaken. Where just a small part of the site is in flood zone 2 or 3 a judgement was made by officers as to how much of a constraint this would be and whether these should be included as Stage 2 sites. A total of 8 sites were deferred as Stage 1 sites. A list of these sites and reasons for deferring these sites is attached at Appendix 7.

6.9 For those remaining 236 sites, a further second stage of analysis was undertaken, taking into account a variety of recognised constraints to housing development as detailed below. All of the remaining sites were assessed for their suitability (potentially), availability and achievability.

Table 5: Stage 2 sites deferred

Stage 2 sites, reasons for deferring	Explanation
Adjacent uses	Site is adjacent to employment uses or major roads that would make it an unsuitable location for housing (only sites deferred where little potential exist to address these concerns)
Access	Significant access restrictions to site
AONB	Site in a designated Area of Outstanding Natural Beauty
Archaeology	Site contains an area of archaeological importance that cannot be mitigated against
Community	Valued community facility
Completed	Site already completed
Employment	Valued employment site/ allocated employment site (the employment land review will provide further guidance in

	terms of this)
Flood	Site is within an area of flood risk
Legal	The site has legal issues
Location	Site is not adjacent to existing settlement
Nature	Site has a nature designation that may not be mitigated (details provided in Appendix 7)
Open space	Valued public open space
Ownership	Site has complex multiple ownership issues which would effect deliverability
PPG15	Historical environment constraints
Proposed Use	Site proposed for a use other than housing
Scale	Site is of an inappropriate scale to its surroundings
Unavailable	Site is unavailable due to an existing use
Unsustainable	Site is in an unsustainable location
Unviable	Site is unviable as a residential development
Utility	Valued utility site

6.10 A total of 150 sites were deferred at Stage 2 and the list of these sites and reasons for deferring them are attached at Appendix 7. It is important to note that the SHLAA uses a general assessment of flood risk in accordance with the Environment Agency's categories. If housing sites come forward they will be subject to evidence from a more detailed Strategic Flood Risk Assessment undertaken for Babergh District Council and Tendring District Council and planning applications will need individual flood risk assessments where relevant.

6.11 A number of the sites deferred were in the smaller villages in the district which are unsustainable and do not relate well to the existing scale and location of the settlement.

7. Estimating housing potential

7.1 The site sieving process identified 86 remaining sites as potentially suitable, available and achievable for housing over some 403 area of land (following Housing Market Partnership consultation on the final draft, this figure rose from 85 sites to 86 sites). A crude estimate of housing potential, based on the 30 dwellings per hectare rule for the remainder of the sites, is approximately 12,100 dwellings. These sites have been looked at in further detail with maps and proformas completed for every site proposed for inclusion in the SHLAA attached at Appendix 9. The proformas make a realistic estimate of the potential yield of each site and give an indication of when the site is likely to come forward for development.

7.2 Of the sites that are considered potentially suitable some more detailed analysis has been undertaken to provide an indication of hectares and brownfield/greenfield and split by settlement. The housing potential of each site, that passed Stages 1 and 2, has been estimated in a variety of ways.

7.3 For those sites identified through the adopted Local Plan, or previous urban capacity studies, the dwelling capacities identified in these documents has been used, unless additional information had come to light to suggest an increase or decrease would be appropriate. For sites with planning permissions the dwelling capacities approved were used. For the remainder, the guidelines shown in the table below were used as a basis of calculating the approximate dwellings;

Table 6: Council dwelling estimations

Sudbury, Hadleigh and Ipswich Fringe	Villages
50 dwellings per hectare generally but provision were made for large sites to include requirements for infrastructure, employment, open space, etc. In addition constraints and landowner attitudes were also considered	30 dph generally but constraints and landowner attitudes also considered. No more than 15% of existing housing stock.

7.4 The information above has been used to produce the council's estimated capacity of the sites taken forward. As indicated in the table site constraints and landowner attitudes were also considered to estimate capacity. The estimated capacity of the SHLAA sites is approximately 7,000 dwellings. This equates to a 25 supply of housing land based on providing 280 homes a year in line with RSS requirements. It has to be noted however that there are a notable difference in the 30, 40 and 50 dwellings per hectare yield of sites with planning permission or allocations in the Local Plan and yields approved or included in the Local Plan. A crude estimation of total capacities at 30, 40 and 50 dwellings per hectare is also provided to allow for any subjectivity in council estimations. This demonstrates that the council's estimations are at the lower end of the scale in terms of estimates and there may be potential to increase capacities if required.

Table 7: SHLAA site dwelling estimations

Brownfield sites						
Settlement	No. of sites	Total hectares	30 dph total	40 dph total	50 dph total	Council estimated capacity
Belstead	1	1.4	42	56	70	5
Brantham	1	0.4	12	16	20	2
Capel St Mary	1	0.5	15	20	25	5
Hadleigh	4	2.6	78	104	130	54
Long Melford	2	0.5	15	20	25	15
Pinewood	2	5.1	153	204	255	172
Shotley	2	20	600	800	1000	475
Gt Cornard & Sudbury	15	8.2	294	392	490	478
Totals	28	40.3	1209	1612	2015	1206
Mixed brown and Greenfield sites						
Capel St Mary	2	17.6	528	704	880	197
Gt Waldingfield	1	3.8	114	152	190	93
Monks Eleigh	1	0.6	18	24	30	18
Totals	4	22	660	880	1100	308
Greenfield sites						

Acton	3	4.9	147	196	245	147
Bildeston	1	3	90	120	150	60
Boxford	3	4.5	135	180	225	134
Brantham	2	9.0	270	360	450	187
Bures St Mary	1	1.5	45	60	75	33
Capel St Mary	1	0.4	12	16	20	12
East Bergholt	5	20.6	618	824	1030	547
Glemsford	5	21.1	583	844	1055	309
Gt Waldingfield	2	7.9	237	316	395	180
Hadleigh	6	29.9	897	1206	1495	838
Hitcham	1	5.3	159	212	265	5
Holbrook	3	3.7	111	148	185	111
Lavenham	4	4.2	126	168	210	124
Long Melford	3	7.0	210	280	350	210
Monks Eleigh	1	0.9	27	36	45	27
Nedging Tye	1	0.7	21	28	36	12
Sproughton	1	1.3	39	52	65	30
Gt Cornard & Sudbury	10	214	6423	8564	10705	2545
Whatfield	1	1.1	33	44	55	15
Totals	54	341	10233	13644	17056	5526
Grand Totals	86	403	12102	16136	20171	7040

7.6 Table 8 below illustrates the potential availability for development of the SHLAA sites, as assessed. Where information is unknown, in terms of ownership, general developer interest or infrastructure constraints, sites are categorised in the latter two periods to allow time for such information to be ascertained. The timescales for availability are:

- 0-5 years,
- 6-10 years,
- 11-15 years

7.7 As a rule, brownfield sites with few constraints have been identified as 0-5 years and those with some constraints as 6-11 years. The timeframes for delivering greenfield sites have been identified using information obtained during the research of sites on landownership, constraints and the need to maintain a supply of housing in the larger villages within the district. It should be recognised that all of the timeframes are estimates only for the purpose of the SHLAA. The Local Development Framework may need to phase development of sites to ensure that infrastructure is in place.

7.8 Providing this information is in line with the Government SHLAA guidance (DCLG, July 2007) where it states that a trajectory should be produced to set out how much housing can be provided and at what point in the future. Where information on availability has been put forward by the landowner or developer, planning officers, in collaboration with the Housing Market Partnership, have attempted to assess how realistic this information might be in terms of the need to deliver infrastructure first on some sites, or remediate other constraints such as the issue of multiple ownership.

Table 8 SHLAA site timeframe estimations

Settlement	2009-2014	2015-2020	2021-2026
	dwellings	dwellings	dwellings
Brownfield sites			
Belstead	5	0	0
Brantham	2	0	0
Capel St Mary	5	0	0
Hadleigh	46	8	0
Long Melford	6	9	0
Pinewood	172	0	0
Shotley	225	250	0
Gt Cornard & Sudbury	478	0	0
Totals	939	267	0
Mixed brown and Greenfield sites			
Capel St Mary	0	27	170
Gt Waldingfield	93	0	0
Monks Eleigh	0	18	0
Totals	93	45	170
Greenfield sites			
Acton	39	0	108
Bildeston	0	60	0
Boxford	20	54	60
Brantham	0	160	27
Bures St Mary	33	0	0
Capel St Mary	0	12	0
East Bergholt	167	135	245
Glemsford	87	96	126
Gt Waldingfield	0	90	90
Hadleigh	196	255	387
Hitcham	5	0	0
Holbrook	12	9	90
Lavenham	40	0	84
Long Melford	69	54	87
Monks Eleigh	0	0	27
Nedging Tye	12	0	0
Sproughton	30	0	0
Gt Cornard & Sudbury	864	782	899
Whatfield	15	0	0
Totals	1589	1707	2230
Grand Totals			
	2621	2019	2400

7.9 It is clear from the table above that the sites identified could potentially be phased to achieve a good spread of development over the 15-year timeframe between the district's towns and villages. Large sites without particular constraints have been phased equally over the 15-year period. Clearly the delivery of these sites will be dependent on adequate infrastructure being in place and as such these timescales may be subject to change and indeed the completion of some of the larger sites may carry over into the next plan period.

8. SHLAA Progress and Review

8.1 **Babergh District Council** is publishing this report as background evidence to demonstrate sufficient housing land availability up to the period 2026. **This report does not allocate housing sites for development.** Broad locations for the development of housing will be considered through the Core Strategy document due for submission in March 2010 and allocations in the Site Specific Allocations document anticipated to be start in 2010. Therefore, any representations made on the sites outlined in this report may contribute to the plan making process at a later date.

8.2 As stated previously in this report, information on sites will need to be updated annually. A full re-survey of sites will not be necessary on an annual basis, but information on new sites can be incorporated into the SHLAA. New sites will only be included where they are considered to be in sustainable locations.

9. Contacts

Forest Heath District Council

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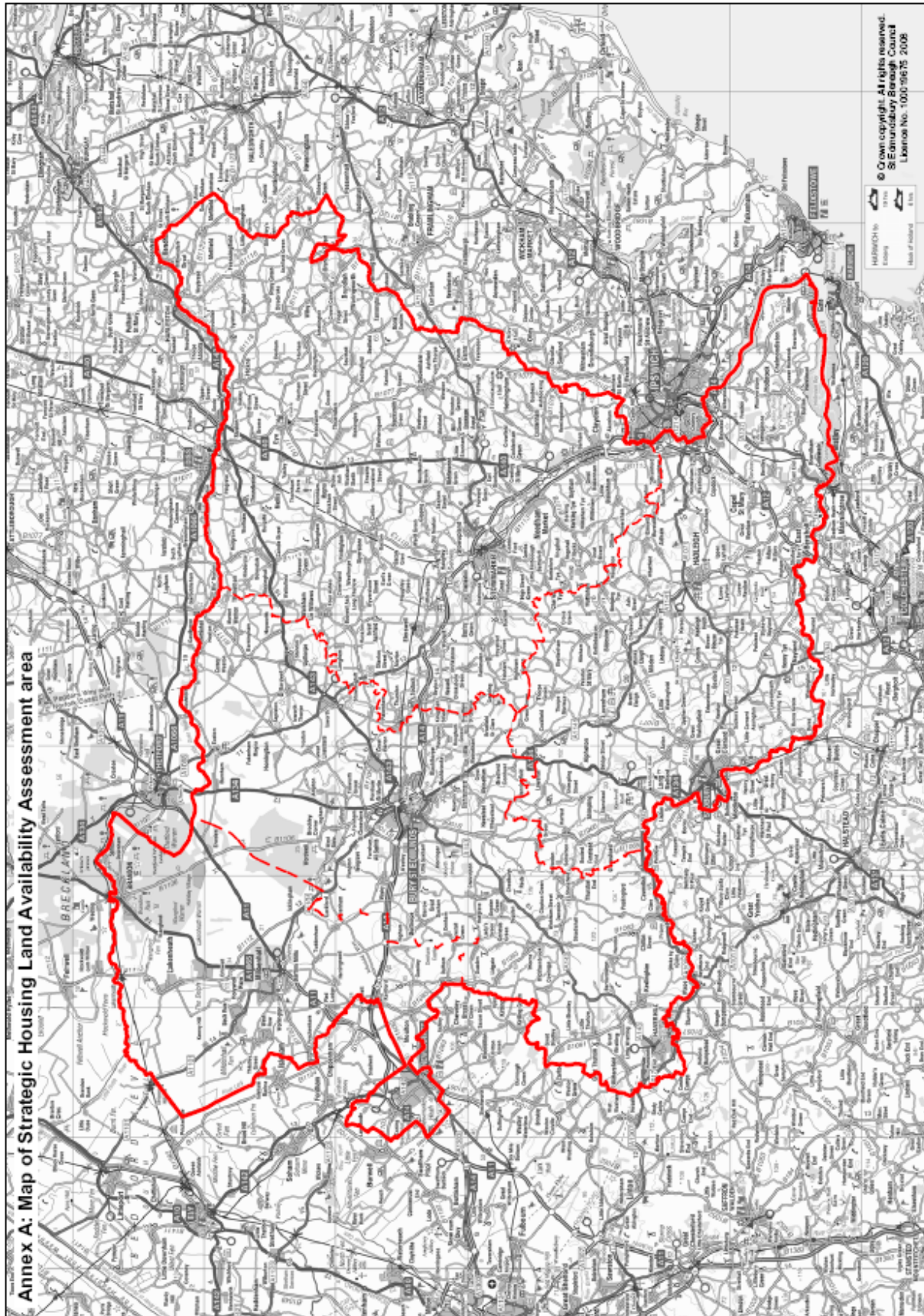
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Appendix 1

Map of SHLAA area



Appendix 2

Housing Market Partnership consulted on SHLAA methodology June 2008

Registered Social Landlords

Cotman Housing Association Ltd
Circle Anglia
Flagship Housing Group
Granta Housing Society
Hanover Housing Association
Hastoe Housing Association
Havebury Housing Partnership
Housing 21
Iceni Homes Ltd
Jephson Housing Association
Orbit Housing Association
Orwell Housing Association
Sanctuary Housing Association

Planning agents/developers/builders

Andrew Martin Associates
Anglia Design Associates
Architectural Design (Newmarket) Ltd
Architectural Services Anglia Ltd
Ashwell
Barton Willmore
Bedfords
Bellway Homes
Bidwells
Birketts
Bovis Homes
Boyer Planning
Brain Eyley Partnership
Brooks Architects
Brown & Co
Brown & Scarlett
Carter Jonas
Cheffins
Chilton Planning
CgMS
Carter Jonas
Countrywide Surveyors
Crest Strategic Projects
David Whymark Building Design & Conservation
Defence Estates and Operations International
Donald Insall Associates
Edward Gittins Planning Consultant
Entec UK Ltd
Fenn Wright
Freeland Rees Roberts Architects
Gerald Eve
George Wimpey UK Ltd
Gibbons Building Design
GJ Bream & Son
Gorniak & McKechnie Ltd
GL Hearn Planning
Halycon
Hayes New Homes
Heritage Planning

Hopkins Homes Limited
HPN Ltd
Indigo Planning Limited
Januarys
John Atkins Architect Ltd
John Finch Partnership
John Hobden Home Design
John Peacock Planning
KWA Architects
Lacy Scott & Knight
Land Planning Associates
Last & Tricker Partnership
Laurence Homes (Eastern) Ltd
Lawson Planning Partnership
Lynwood Associates
Michael Bullivant Associates
MJC Associates
Neale Associates
Peacock & Smith
Peacock Short Property Solutions
Percivals
Pegasus Planning Group
Persimmon Homes
Peter Codling Architects
Philbin & Champion
Philip Brown Associates
Pick Everard
Prior Associates Ltd
Purcell Niller Tritton LLP
Rapleys
R Callow
Rees Pryer Architects LLP
RPS
Robert Turley Associates
Roger Peyton
Savills
Smiths Gore
Smith Stuart Reynolds
Stuart P Reid Planning Services
Strutt & Parker
The Stoodley Partnership
The Johns Practice
Thos. Wm. Gaze & Son
Tricker Blackie Associates
Wilby & Burnett
Wilson Connelly (Home Counties)

Planning Authorities

Braintree District Council
Breckland District Council
Colchester Borough Council
East Cambridgeshire District Council
Ipswich Borough Council
South Norfolk District Council
Suffolk Coastal District Council
Suffolk County Council
Tendring District Council
Waveney District Council

Other Housing Market Partnership stakeholders

House Builders Federation
Housing Corporation Eastern Region
GO- East
EERA
English Nature
Environment Agency
National Trust

Appendix 3

Methodology questionnaire and Stakeholder's responses to SHLAA methodology

Questionnaire: Draft Methodology of the Strategic Housing Land Availability Assessment (SHLAA)

1. Do you agree with the joined partnership, management and scrutiny arrangements proposed? Do you agree with the timetable proposed and the stakeholders identified?
2. Do you agree with the list of settlements identified in Annex B of the SHLAA report? Do you agree that sustainability should be considered?
3. Do you agree with the areas of search to be included in the SHLAA mentioned in par. 2.9 should be excluded?
4. Are there any other sources of data as identified in Table 5 that should be considered to identify sites to be included in the SHLAA?
5. Do you agree with the sources identified to inform multipliers as identified in 2.18?
6. Do you agree with the proposed site size thresholds proposed in Par 2.19?
7. Do you agree with the criteria to assess sites as identified in Table 6?
8. Are there any other comments you would like to make?

Please return the completed questionnaire no later than 5pm on the 7th July 2008 to Planning Policy, Babergh District Council, Corks Lane, Hadleigh, IP7 6SJ or email to ldf@babergh.gov.uk.

Should you have any queries regarding this please call Ms Sylvia Stannard at 01473 825712.

Housing Market Partnership stakeholder responses to SHLAA Methodology (Agenda Item 3)			
Ref.	Consultee	Comment	Councils' Response
08/00054	CgMS	Consider timetable set out in Table 3 is unreasonable and not consistent with DCLG Guidance. Needs to be reconsidered if stakeholders are to have effective opportunity to get involved in assessment. Table 3 states discussions were to take place with stakeholders during consultation on the methodology. How is this possible as one of questions asked in current consultation is who should be a stakeholder?	Timetable has been revised to allow sufficient time for full engagement of the stakeholder panel. Table 3 indicated approximate dates for consultation with a stakeholder panel which was after consultation on the methodology. CGMS were notified of the consultation on the methodology as indicated in Annex C.
		We support proposal in Para. 2.7 that the study will assess sites put forward by landowners/developers, and consider that an invitation to submit additional sites should be made on completion of the current consultation exercise.	Each of the four districts involved will determine individually whether an additional call for sites is required on the basis of the information obtained during the desk top survey.
		Para. 2.8 should be more specific about the circumstances where it is proposed to exclude land from consideration on grounds of compliance with Para. 21 of the DCLG Practice guidance.	National and Regional higher level policy restrictions will aid the authorities in determining land to be excluded. Current Structure and Local Plan policies will not be taken into account when assessing land.
08/00055	Barton Willmore	Should provide further guidance on matters or criteria which will be applied to exclude sites. Methodology needs to be clear and explicit as to criteria as to which sites are to be excluded from the study.	As above.
		SHLAA is silent as to the criteria that will be applied. The methodology should set out clearly the assumptions that will be made in terms of urban sites and greenfield sites. E.g. an average of 40 dwellings per hectare (PPS3) can reasonably apply to greenfield sites. In the case of PDL, assumptions can be made as to the appropriate density in town centres or suburban sites, between flatted and housing based development. It is worth bearing in mind that the SHLAA will identify sites on a gross area basis as opposed to PPS3 net.	A yield analysis will be undertaken for every site identified in the SHLAA. Minimum (30dph) and maximum (50 dph) capacities will be applied.

		In additional to ambitious assessments as to the supply of housing arising from windfalls, housing land supply is often frustrated by ambitious completion rates. The SHLAA should be clearer as to the assumptions employed.	Windfall assumptions to be discussed at Panel meeting.
		It is useful to bear in mind that the purpose of the SHLAA is not to consider the merit of sites but identify capacity. We accept that the two are not mutually exclusive but do feel that Table 6 goes beyond that which is required in terms of SHLAA, being qualitative as opposed to quantitative.	Propose that Table 6 is amended and discussed at Panel meeting. The site survey form will record 'issues to be addressed'.
08/00049	Natural England	Whilst we strongly support the inclusion of wildlife as a potential constraint to housing development, it is not clear how the assessment of important wildlife features will be made. For example, a County Wildlife site could fall into a weakness under both 'designated/protected area' and 'ecology' categories.	As above. Factual information will be recorded. Strengths and weaknesses will not be considered.
		What sources of information will be used to support ecological assessment? Will site surveys be carried out if there are no existing records? What is a significant wildlife feature? How will the presence of Biodiversity Action Plan habitats and species and legally protected species be considered in the assessment?	Mid Suffolk has already undertaken surveys. Ecological Site Surveys will be carried out by other councils during site specific allocations DPD preparation. The site survey form has been amended to state 'Ecology - protected species' .
08/00044	Ashwell Developments Limited	The SHLAA process should contain a Trajectory of sites over a rolling 15 year period, and that this Trajectory contains outputs that are reasonable and based upon the market conditions prevalent at the time.	It is not the purpose of a SHLAA to provide a housing trajectory. That is the function of the DPDs and Annual Monitoring Report.
		Stages 4-7: it would be advisable that the industry is involved at all stages of site identification. It is in this regard that the use of panels would best serve the process.	Agreed. Sites will be brought to the panel at meetings 2 & 3.
		Stage 10: The national SHLAA guidance makes it fully clear that local authorities should not include 'windfalls' in the first 10 years land supply unless there are exceptional reasons to justify this. It is considered age. Consequently, it would not expect windfalls to be included in the initial 10 year land supply identified.	Agree. Windfalls not to be included.

		Questionnaire Q3. It is suggested that the list identified is not sufficiently comprehensive to fully inform site selection. As such a more sophisticated approach would be welcomed. It is considered that this would best be formulated by input from a variety of industry professionals.	Agree. Panel input welcomed.
		Questionnaire Q6. As a guide the thresholds should assist with the management of the process. However, they should not be applied too prescriptively as this may result in the loss of opportunities. As a point of detail the out of town threshold may exclude exception.	For discussion at Panel Meeting. Suggest 0.2 ha across whole SHLAA study area.
		Questionnaire Q7. It is suggested that, among others, the contents of Table 6 needs to be considered by an industry panel who in turn should ensure its robustness as part of the SHLAA process.	See above. Suggested that Table 6 is amended.
08/00042	Home Builders Federation Ltd.	The Government SHLAA practice guidance states in the 'importance of a partnership approach' section that assessments should preferably be undertaken by housing market partnerships where established. It is also important to recognise that the Partnership requires the active involvement of stakeholders and isn't just about joint working between authorities.	Agree.
		2.8 It is specified that certain areas of land will be excluded from the assessment. However, no explanation is given of what and where these are.	As above.
		2.9 It is stated that the study will examine sites that are appropriate in scale relative to the level of development planned for. It is not apparent what is precisely is meant by this.	National and Regional higher level policy restrictions will aid the authorities in determining land to be excluded. Current Structure and Local Plan policies will not be taken into account when assessing land.
		2.19 With regard to the site size thresholds, it is unclear what particular category the small sites on the edge of existing settlements would fall in. It would be inappropriate to only consider sites of over 1 ha in size in such instance. This needs to be made clear.	For discussion at Panel Meeting. Suggest 0.2 ha across whole SHLAA study area.

08/00047	Bidwells	Q1 there is an anomaly in that Mid Suffolk and Babergh have joined forces with Ipswich and Suffolk Coastal for the Strategic Housing Market Assessment. Therefore the housing market areas are being considered separately from the housing land availability. Is there a particular reason why the SHLAA does not include Ipswich and Suffolk Coastal.	The studies have been undertaken separately due to issues of timing. Ipswich and Suffolk Coastal will be undertaking SHLAAs at a later date.
		Q2 Appears to be limited geographical scope of assessment in Forest Heath. Only a few settlements have been surveyed whilst there are a number in other districts - is there a particular reason for this?	This is due to geographical size of the district and smaller number of villages.
		Q4 Desktop review of existing information (Stage 3) - would be a good idea to consider sites already promoted for development as part of production of LDFs. I would expect that sites will be assessed on an individual basis and that some of them will not automatically be discounted purely on the basis that they are in or around settlements that do not comply with the criteria in the emerging core strategies.	Sites submitted as part of LDF production will be included in the SHLAA.
		It would be useful if we could get the councils to agree that there will be an opportunity for those with land interests in the area to submit new potential sites for assessment through the SHLAA process.	See above. The districts will consider this matter on an individual basis after the desk top study is complete.
		Q5 What is meant by local plan policy? Current densities can obviously provide a general guide. Would presume emerging policies would be LDF and there is the potential for these to be challenged - therefore if significantly different (especially over a number of sites) could see skewed results.	See above. National and Regional policy restrictions will guide the authorities as to land to be excluded.
		Q6 concerned that the site size threshold is set too high for those areas outside of the towns and rural settlement boundaries. There are likely to be smaller sites in such areas available for development and because they are smaller than 1 ha are more likely to be suitable for development and achievable and would contribute to mixed and balanced communities. I would suggest that the site size threshold for areas outside the towns and settlement development boundaries might also be set at 0.2ha.	For discussion at Panel Meeting. Suggest 0.2 ha across whole SHLAA study area.

		Q7 Site assessment checklist - suggest that some of the issues identified as 'constraints' in the checklist may not be as constraining to all sizes of development as indicated.	See above. Constraints are not to be considered. Factual information only to be recorded.
		The definition of a major policy constraint needs to be clearly defined - if its national/ regional policy then fine, however if it is emerging LDF policy it is not appropriate to apply it as a judgement because the policy could change.	As above.
08/00057	TW Gaze	Q6 No - these allowances seem random and are not helpful, particularly 1ha for outside settlement boundaries. This seems to exclude small additional developments on villages.	For discussion at Panel Meeting. Suggest 0.2 ha across whole SHLAA study area.
		Q7 No. Floodzone - concerns can be overcome through construction methods. Contamination - can be overcome. Sites should be cleared up anyway. Public Transport - This issue should be resolved or ignored. Unsuitable location - this is too vague, can be interpreted openly by each council.	See above. Factual information will be recorded.
08/00053	John Martin Associates	Q6. Disagree with proposed site size thresholds. Does not seem to be any logic as to why sites within towns and rural settlements both have a size threshold of only at least 0.2ha, whereas sites outside current town boundaries and village envelopes have a threshold increase of 500% at 1.0ha. We would advocate that smaller sites at the very edge of existing environs should also be considered, particularly where they score well under the Site Assessment Criteria check list, identified at Table 6. We would therefore advocate a minimum site threshold outside the town boundaries and beyond development boundaries at 0.5ha.	For discussion at Panel Meeting. Suggest 0.2 ha across whole SHLAA study area.

Appendix 4

Housing Market Partnership stakeholder attendees at September 2008 and December 2008 SHLAA meetings

Name	Organisation	September 12 2008	December 10 2008
Paul Cronk	Home Builders Federation		
Simon Butler Finbow	Ashwell		
Lisa Scrivener	Robinson & Hall	Attended	
Rob Hopwood	Bidwells	Attended	Attended
Charlotte Gorst	Gerald Eve	Attended	
Roger Davison	Lacy Scott and Knight	Attended	Attended
Richard Tilley	CGSM Ltd.	Attended	Attended
Alison Collins	Natural England		
Adam Ireland	Environment Agency	Attended	
Sarah Platt	Suffolk Preservation Society		
Robert Eburne	Hopkins Homes		
James McConnell	Bellway		
Nathan Cole	Iceni Homes	Attended	Attended
Kathryn Money	RPS	Attended	
Carol Grimsey	Suffolk County Council	Attended	
Roy Banks	SALC	Attended	
John Popham	John Popham Consultants	Attended	
Richard Sykes Popham	John Popham Consultants	Attended	Attended

**Appendix 5
SHLAA Site Appraisal Sheet**

Date of site survey:

Site reference:
Site address:
OS grid ref:
Site Area/estimated dwelling capacity:
How site was identified:
Landowner/developer details:
Agent's details:
Site description:

Key issues	Comments
Existing uses	
Suitability for housing	
Previously-developed land or green field site?	
Existing use	

Key issues	Comments
Developable limitations	
Contaminated and Hazardous land	
Flood risk	
Designated / protected area	
Impact on Landscape	
Agricultural land classification	
Ecology – protected species	
Infrastructure – water/drainage/sewerage	
Access and Highways (access to A & B roads)	
Access to services (to be identified through mapping)	

Key issues	Comments
Local employment opportunities	
Public transport – bus service	
Access to convenience shop(s)	
Access to health centre/doctors' surgery	
Access to primary school	
Access to open space	
Availability for housing	
Site ownership	
Achievability / viability	

Key issues	Comments
Market factors	
Cost Factors	
<p>Conclusions and justification</p> <p>The site is suitable</p> <p>The site may be suitable</p> <p>The site is not suitable</p>	

Appendix 6 SHLAA Site sieving assessment sheet

Stage 1 sites, reasons for exclusion	Explanation
Size	The site is below the 0.2 ha or 5 dwelling threshold set for the SHLAA
Flood Zone	At least 50% of site is within Flood Zone 2 or 3 which cannot be mitigated against rendering the site unsuitable for development
Contamination	High levels of contamination that make site unsuitable for housing
Conservation/Wildlife	National conservation or wildlife designation that cannot be mitigated

Stage 2 sites, reasons for exclusion	Explanation
Adjacent uses	Site is adjacent to uses such as employment or major road that would make it an unsuitable location for housing (only sites excluded where little potential exist to address these concerns)
Access	Significant access restrictions to site
AONB	Site in a designated Area of Outstanding Natural Beauty
Archaeology	Site contains an area of archaeological importance that cannot be mitigated against
Community	Valued community facility
Completed	Site already completed
Employment	Valued employment site
Flood	Site is within an area of flood risk
Legal	The site has legal issues
Location	Site is not adjacent to existing settlement
Nature	Site has a nature designation that cannot be mitigated
Open space	Valued public open space
Ownership	Site has complex multiple ownership issues which would effect deliverability
PPG15	Historical Environment constraints
Proposed Use	Site proposed for a use other than housing
Scale	Site is of an inappropriate scale to its surroundings
Unavailable	Site is unavailable due to an existing use
Unsustainable	Site is in an unsustainable location
Unviable	Site is unviable as a residential development
Utility	Valued utility site

Appendix 7
Deferred SHLAA sites: Stage 1 and Stage 2

Stage 1 Sites deferred						
Site Ref	Settlement	Size	Site Name	Source	Current Use	Reason for deferring
SB69	Boxford	1.5	East of Stone Street Road	Maps	Field	Floodrisk; PPG15; Not available
SB72	Brantham	29	Factory Lane, Brantham	Site submitted	Part Employment, Part Vacant. Railway Line through site.	Floodrisk; Employment
SB106	Bures St Mary	3.2	South of Nayland Road	Maps	Agriculture	Floodrisk; Not available
SB182	Glemsford	0.6	Land at former Railway Station Goods Yard, Lower Road, Glemsford	Sites submitted	Former Railway Station Goods Yard with part commercial leisure building	Floodrisk; Location; Access
SB306	Lavenham	0.97	South of Preston Road	Maps	Open area	Floodrisk; Not available
SB349	Long Melford	2.8	Northwest of Liston Lane	Maps	Meadow	Floodrisk; Access; Not available
SB418	Great Cornard	1.9	Land west of B1508/ Brook Farm	Maps	Fields	Floodrisk; Not available
SB286	Lavenham	0.08	Water Street	Urban Capacity Study	Vacant	Size
Stage 2 Sites deferred						
Site Ref	Settlement	Size	Site Name	Source	Current Use	Reason for deferring
SB6	Acton	0.5	Hillcrest, Bull Lane, Acton	Sites submitted	Field	Location
SB328	Acton	2.74	Adj to Beech Bungalow, Bull Lane, Long Melford	Sites submitted	Agricultural/grazing land	Location
SB12	Acton	2.4	Northwest of Sudbury Road	Maps	Agricultural	Not available
SB13	Acton	0.8	Southwest of Melford Road and northwest of West Cottage	Maps	Agricultural	Location; Not available
SB18	Acton	1.9	Northeast of Clayhall Lane, adj to Willow End House	Maps	Agricultural	Not available
SB21	Acton	6.1	South of Vicarage Lane, adj Babergh Heath Farm and The Old Vicarage	Maps	Agricultural	Not available

SB22	Acton	6.1	West of Barrow Hill	Maps	Agricultural	Not available
SB24	Assington	0.3	Barrack Road, Assington	Sites submitted	Garden	Location; Unsustainable
SB37	Bildeston	0.95	East of Consent Lane	Maps	Agricultural land	Flood (40-50% of site); Not available
SB38	Bildeston	0.78	Northeast of B1115 and northwest of Westview	Maps	Agriculture	Not available
SB40	Bildeston	1	Southwest of B1115 and adj to 147 High Street	Maps	Agricultural	Access; Part not available
SB42	Bildeston	8.6	East of Wattisham Road	Maps	Agriculture	Access; Not available
SB43	Bildeston	2.8	North of B1078	Maps	Agriculture	Not available
SB45	Bildeston	5.3	East of Hadleigh Road	Maps	Agriculture	Not available
SB48	Bildeston	1.6	North of Church Road	Maps	Agriculture	Not available
SB52 & SB101	Boxford	2.9	Land at Butcher's Lane, Boxford, Suffolk.	Sites submitted	Agriculture	Access
SB54	Boxford	1.02	Land At Samples Stone Street, Boxford	Site submitted	Residential and garden; field	Location; Access
SB57	Boxford	1.11	School Hill/ Stone Street	Maps	Residential and Shrubs	PPG 15; Not available (in use)
SB58	Boxford	1.22	School Hill/ Boxford Lane	Maps	Residential and Natural area	PPG 15; Not available (in use)
SB60	Boxford	11.4	Southeast of Cox Hill	Maps	Agriculture	Access; Not available
SB61	Boxford	2	Northwest of Cox Hill, adj to Hillside	Maps	Agriculture	Not available
SB62	Boxford	0.76	Land East of Butcher's Lane	Maps	Pastures	Access; Location; Not available
SB65	Boxford	5.3	North of Sherbourne Street	Maps	Agriculture	Not available
SB66	Boxford	3.9	South of Sherbourne Street	Maps	Agriculture	Not available

SB67	Boxford	4.4	North of Boxford Lane	Maps	Agriculture	Not available
SB73	Brantham	0.61	Brantham Hill	Urban Capacity Study	Garden land	Legal
SB74	Brantham	0.39	Gravel Pit Lane	Urban Capacity Study	Garden land	Ownership; Access
SB76	Brantham	29	Land near Park Road, Brantham	Site submitted	Agriculture	AONB; Scale
SB79	Brantham	0.33	Temple Pattle	Maps	Grassed area	Open space; Not available
SB80	Brantham	0.28	Brooklands Rise	Maps	Grassed area	Open space; Not available
SB83	Brantham	1.7	North of Brantham Hill	Maps	Agriculture	Not available
SB84	Brantham	6.6	East of Brooklands Rise	Maps	Agriculture	Not available
SB87	Brantham	5.1	South of School Lane, Brantham Place	Maps	Residential and Shrubs	Access; Not available
SB90	Brantham	1.7	North of Gravel Pit Lane	Maps	Agriculture	Access; Legal; Not available
SB91	Brantham	2	North of Slough Road	Maps	Agriculture	Not available
SB92	Brantham	3.4	East of Rectory Lane, Brantham Place	Maps	Residential; amenity and shrubs	Access; Not available
SB100	Bures St Mary	0.23	The Old Slaughterhouse, Cuckoo Hill, Bures St Mary	Sites submitted	Vacant industrial buildings	Employment
SB104	Bures St Mary	0.5	North of Cuckoo Hill	Maps	Agriculture and builders yard (in use)	Not available (partly in use)
SB108	Bures St Mary	3.2	North of Nayland road	Maps	Agriculture	Not available
SB105	Bures St Mary	2.1	South of Cuckoo Hill and adj Friends Field	Maps	Agriculture	Access; Not available
SB121	Capel St Mary	0.45	Yard at London Road, Capel St Mary, Ipswich	Sites submitted	Transport Depot	Employment; Adjacent Uses
SB122	Capel St Mary	0.7	Land to the north of Thorney Road, Capel St Mary	Sites submitted	Vacant agricultural land	Access
SB124	Capel St Mary	10.36	Land on the North Eastern Edge of Capel St Mary	Sites submitted	Agriculture	Access
SB125	Capel St Mary	2.9	Land on the North Eastern Edge of Capel St Mary	Sites submitted	Agriculture	Access
SB132	Capel St Mary	2.9	East of Days Road	Maps	Agriculture	Access; Not available
SB133	Capel St Mary	5.2	North of Rylands Road	Maps	Agriculture	Access; Not available

SB136	Capel St Mary	1	South of Red Sleeve	Maps	Agriculture	Not available
SB144 & SB147	Cockfield, Cross Green	0.6	Land to the east of the A1141 (adj Hope House), Cockfield Cross Green.	Site submitted	Vacant farm buildings. Redundant agricultural buildings and barns	Unsustainable
SB145	Cockfield (countryside)	3.96	Abbey Meadow, Bury Rd, Cockfield	Site submitted	Meadow	Location; Unsustainable; Scale
SB146	Cockfield, Great Green	0.55	Land at Great Green, Cockfield	Sites submitted	Agricultural	Unsustainable
SB149	Copdock and Washbrook (south)	0.8	Folly Lane, Copdock	Site submitted	Agricultural	Unsustainable
SB150	Copdock and Washbrook (south)	1.0	Land at 79 London Road, Copdock and Washbrook	Site submitted	Equestrian	Unsustainable
SB151	Copdock and Washbrook	2.5	Highfield, Back Lane, Washbrook	Site submitted	Grazing	Unsustainable
SB157	East Bergholt	0.1	Quintons Road	Urban Capacity Study	Residential	Completed
SB158	East Bergholt	0.3	Manningtree Road	Urban Capacity Study	Paddock	AONB; Not available
SB159	East Bergholt, East End	0.41	Park Road	Urban Capacity Study	Amenity	Access; Ownership; Unsustainable
SB161	East Bergholt	0.42	Gatton House, Hadleigh Road, East Bergholt	Sites submitted	Field	AONB
SB162	East Bergholt, East End	2	Kingsland Farm, Park Road, East Bergholt	Sites submitted	Agricultural	Unsustainable
SB166	East Bergholt	1.5	West of Hadleigh Road/ The Gables	Maps	Residential; amenity; shrubs and grassed areas	AONB; PPG15; Not available
SB168	East Bergholt	0.3	East of Gaston Street/ Richardson Farm	Maps	Trees; Shrubs; amenity	AONB; PPG15; Not available
SB179	Glemsford	0.55	Lion Road	Urban Capacity Study	Garden Land	Legal; Ownership; Access
SB183	Glemsford	0.85	Glemsford Silk Mills, Chequers Lane, Glemsford	Sites submitted	Factory	Employment
SB184	Glemsford	0.28	Adj to School site/ East of Shepherds Lane	Maps	Field	PPG15; Not available
SB185	Glemsford	0.8	Open area adj to Schoolfield Road	Maps	Residential and open space	Open space; Not available

SB186	Glemsford	0.36	South of Kings Road	Maps	Open space	Open space; Not available
SB190	Glemsford	3.9	East of Shephards Lane	Maps	Agriculture and dwelling	Not available
SB191	Glemsford	1.6	West of Duffs Hill	Maps	Agriculture	Not available
SB192	Glemsford	0.65	East of Duffs Hill	Maps	Agriculture	Location; Not available
SB197	Glemsford	1.6	North of Flax Lane	Maps	Agriculture	Not available
SB198	Glemsford	2.4	South of George Lane	Maps	Agriculture	Access; Not available
SB203	Glemsford	0.84	East of Brook Street	Urban Capacity Study	Vacant industrial buildings	Employment
SB204	Glemsford	3.9	West of Shephards Lane	Maps	Agriculture	PPG15; Access
SB205	Glemsford	0.23	Allotments Third Ave and Broadway	Maps	Overgrown field	Not available
SB207	Gt Waldingfield	9.51	Land formerly part of poplars farm, Gt Waldingfield.	Sites submitted	Agricultural	Access; Adjacent Uses
SB210	Gt Waldingfield	0.4	Lavenham Road/ Green Acre	Maps	Open space	Open space; Not available
SB211	Gt Waldingfield	2.2	East of Tentree Road and West of The Heath	Maps	Agriculture	Not available
SB213	Gt Waldingfield	3.2	South of Folly Road	Maps	Agriculture	Not available
SB215	Gt Waldingfield	5.4	South of B1115/ Chilton Corner Cottages	Maps	Agriculture	Not available
SB230	Hadleigh	1.3	Land at Gallows Hill, Hadleigh, IP7 6JQ	Sites submitted	Redundant/ agricultural land	Adjacent Uses
SB232	Hadleigh	9.89	Pond Hall Road/ Hook Lane Hadleigh	Sites submitted	Paddocks	Access
SB235	Hadleigh	0.72	Land to the South of Lady Lane Industrial Estate	NLUD and site submitted	Vacant industrial	Employment
SB238	Hadleigh	1	Coram Park, Coram Street, Hadleigh	Sites submitted	Paddock	Location
SB243	Hadleigh	12.8	South of A1071/ East of Aldam Mill Hill	Maps	Agriculture	Not available
SB245	Hadleigh	3.9	South of Brett Ave	Maps	Field	Not available; Legal (tied up with allocation)
SB247	Hadleigh	2.2	Priory Farm, West of Benton Street	Maps	Agriculture	Not available
SB262	Holbrook	2.65	Land north of Hyams Lane,	Sites submitted	Greenfield Land	Access

			Holbrook			
SB265	Holbrook	1.1	West of Pettwood Gardens; Pettwood	Maps	Residential; amenity and vacant land	PPG 15; Not available
SB268	Holbrook	0.6	South of Woodlands Road	Maps	Agriculture	Access; Not available
SB272	Holbrook	1.2	West of The Street	Maps	Agriculture	Scale; Access; Not available
SB279	Chantry Vale	3.5	North of Hadleigh Road	Maps	Agriculture	Not available
SB280	Chantry Vale	6	West of A1214	Maps	Agriculture	Access; Not available
SB283	Lavenham	0.29	Church Street	Urban Capacity Study	Garden Land	PPG15, Access
SB284	Lavenham	0.3	Prentice Street	Urban Capacity Study	Garden land	PPG15
SB287	Lavenham	0.39	Norman Way	Urban Capacity Study	Garden Land	Ownership; Access
SB288	Lavenham	1.51	Riverside Works, Bury Road, Lavenham, Suffolk, CO10 6QD	Sites submitted	Existing employment use (applicant indicated vacant but appears to be in use)	Employment
SB289	Lavenham	1.765	Land to rear of Norman Way, High Street, Lavenham	Sites submitted	Meadow/Paddock	Location; Access; Adjacent uses
SB293	Lavenham	0.93	Land at Corner of Melford and Sudbury Road, Lavenham	Sites submitted	Vacant land	Adjacent Uses
SB296	Lavenham	0.4	Barn Street	Maps	Gardens	PPG15; Not available
SB300	Lavenham	1.5	North of Church Street and west of Potland Lane	Maps	Meadow	Not available
SB301	Lavenham	8.4	East of Bear's Lane	Maps	Agricultural field	Access; Not available
SB305	Lavenham	0.64	North of Preston Road	Maps	Agricultural field	Location; Not available
SB309	Lavenham	1.2	East of Sudbury Road	Maps	Agriculture	Not available
SB484	Lavenham	0.73	West of Bear's Lane	Maps	Agriculture	Access; Not available
SB311	Leavenheath	2.2	Orchard Farm, Locks Lane, Leavenheath	Site submitted	Agricultural	Unsustainable
SB314	Lawshall	0.98	Land at Bury Road, Lawshall	Sites submitted	Was Agricultural now derelict	Unsustainable
SB316	Layham	0.35	Land adj Norse Lodge, Church lane, Lower Layham, Ipswich	Site submitted	1 Double garage, Amenity Land, 1 workshop	Unsustainable
SB320	Little Cornard	6.3	Little Cornard Brickworks, Chapel Lane, Little Cornard	Site submitted	Vacant land	Unsustainable; Scale; Location

SB321	Little Waldingfield	0.19	Heathfield House, Little Waldingfield, Sudbury	Site submitted	Overgrown land	Unsustainable
SB327	Long Melford	1.8	Land at Skip Depot, Theobalds Close, Long Melford	Site submitted	Former Depot/ overgrown area	Employment
SB335	Long Melford	0.9	Playground/ Cordell Place	Maps	Open area and playing field	Open space; Not available
SB339	Long Melford	1.3	West of B1064 (larger triangle area)	Maps	Village Green	Open space; Not available
SB340	Long Melford	0.8	B1064 triangle	Maps	Village Green	Open space; Not available
SB341	Long Melford	1.1	West of the B1064/ south of Church	Maps	Village Green	Open space; Not available
SB342	Long Melford	0.4	South of Harefield/ East of High Street	Maps	Open Space	Open space; Not available
SB345	Long Melford	0.7	East of Station Road	Maps	Agriculture	Not available
SB347	Long Melford	2.7	South of Liston Lane	Maps	Meadow	Access; Not available
SB352	Long Melford	0.69	West of B1064/ adj Old School House	Maps	Agricultural field	Not available
SB353	Long Melford	0.8	North Windmill Hill	Maps	Garden	Scale; not available
SB355	Long Melford	2.2	West of High Street	Maps	Agriculture	Not available
SB358	Monks Eleigh	2.1	Area west of recreational field, Church Hill	Site submitted	Recreational Field	Access
SB363	Nayland with Wissington	0.43	The Bungalow, Harpers Hill, Nayland, Colchester, CO6 2 NT	Sites submitted	Residential and field	AONB
SB364	Nayland with Wissington	3	Land Adjacent 32 Heycroft Way, Nayland	Sites submitted	Gardens & Paddocks	AONB
SB369	Nedging Tye	0.73	Crowcroft Road, Nedging Tye	Sites submitted	Field	Unsustainable
SB370	Newton	7.2	Land between Sudbury Road and Church Road, Newton	Site submitted	Field; builders yard and residential	Scale; Unsustainable
SB373	Pinewood	9.7	Land adj to Belstead Brook	Site submitted	Field	Access
SB377	Preston St Mary	0.4	The Street, Preston St Mary	Site submitted	Field	Unsustainable
SB378	Shimpling Street	2.5	Land between Tolcalne and Shimpling House	Site submitted	Agriculture	Unsustainable

SB383	Sproughton	1.7	Burstall Lane, Sproughton	Sites submitted	Grazing	Access
SB385	Sproughton	1.17	East of B1113	Maps	Agriculture	Not available
SB413	Great Cornard	0.37	Pot Kiln road	Urban Capacity Study	Garden Land	Ownership; Access
SB414	Great Cornard	0.24	The Limes, Bakers Mill, Gt Cornard, Sudbury, CO10 0JA	Sites submitted	Vacant-previously office	Employment
SB417	Great Cornard	0.28	Land adj to 66 Cats Lane, Great Cornard	Site Submitted	Nature Reserve	Nature (County Wildlife Site)
SB425	Sudbury	4.5	People's Park, Waldingfield Road, Sudbury	Local Plan Allocation	Field	Not available
SB246	Sudbury	1	Hospital Site, Walnuttree Lane, Sudbury	Local Plan Allocation	Hospital	Not available
SB437	Sudbury	0.5	St Leonards Hospital, Sudbury	Planning Permission	Hospital	Not available
SB444	Sudbury	1.03	Land adj to Newton Croft	Urban Capacity Study	Vacant Land	Access
SB446	Sudbury	0.33	Melford Road	Urban Capacity Study	Gardens	Access
SB450	Sudbury	2.5	Land at Ballingdon Hall Sudbury (A131)	Sites submitted	Farm Buildings & Paddock	Access; Adjacent Uses
SB451	Sudbury	2	Land at Pinecroft Rise, Sudbury	Sites submitted	Field	Open Space; Ownership
SB452	Sudbury	3.2	Land at Ballingdon Hill Sudbury	Sites submitted	Agricultural	Access
SB453	Sudbury	1	Stephen Walters and Sons, Cornard Road, Sudbury	Sites submitted	Silk Factory	Employment
SB454	Sudbury	1.3	St Bartholomew's Farm, Clermont Ave, Sudbury	Sites submitted	Vacant land	PPG 15
SB455	Sudbury	0.3	Land Adjoining Hill Top, Waldingfield Road, Sudbury	Sites submitted	Vacant Land	Employment
SB462	Sudbury	0.64	Belle Vue Park	Maps	Open Space	Not available
SB469	Sudbury	57.8	Land north of A134; adj to Chilton	Maps	Agriculture	Not available
SB330	Sudbury	3.23	The Smallholding, Sudbury Road	Site submitted	Paddocks	Location
SB473	Whatfield	1	Land of Wheatfields, Whatfield	Site submitted	Agriculture	Unsustainable

SB475	Wherstead	0.95	Walled Garden, The Street, Wherstead, Ipswich	Sites submitted	Rough grazing	Unsustainable; Employment
SB476	Wherstead	3.2	Klondyke Field, west of Bourne Hill, Wherstead, Ipswich	Sites submitted	Vacant Land	Unsustainable
SB479	Woolverstone	0.2	Land at Main Road, Woolverstone (adj to Fairwinds)	Site submitted	Horticulture	AONB; Access; Unsustainable

Appendix 8

Comments received from Housing Market Partnership on the draft Babergh SHLAA Report – Consultation May 2009

Consultee	Summary of Comments	Council's Response
Suffolk County Council, Environment & Transport, Carol Grimsey	Pleased with 'SCC Highway issues to be addressed' that are flagged in Appendix 8 worksheets. The actual highways comments made are not reproduced on these worksheets for future reference.	No change. Noted. Detailed comments of SCC Highways will be used later in the planning process and particularly at the Site Specific Allocations stage.
Natural England, Alison Collins	Natural England is satisfied that the SHLAA has been conducted in accordance with the agreed methodology, and, as far as we are able to judge, the information contained within the report is factually correct. We will assess individual sites in greater detail during the Site Specific Allocations Consultation when received.	No change. Support and comments noted.
Boyer Planning, Ray Ricks	SB401 does not fall within the SLA	Change required. Noted and amend accordingly in final report.
CgMs, Richard Tilley	<p>The methodology for the SHLAA should be applied consistently. Our comments focus primarily on the discounting of sites, specifically those with nature designations, the amount of detail provided on methods, assumptions, judgements and findings, and the approach taken in considering whether a site can overcome constraints.</p> <p>Concerned about the exclusion of sites on basis of nature designations that cannot be mitigated as set out in Tables 4 and 5 and Appendix 6.</p> <p>Methodology for discounting sites in the Babergh, St Edmundsbury and Mid Suffolk SHLAAs differ to that of Forest Heath.</p> <p>Consider the methodology description is not sufficiently detailed/transparent in setting out the assumptions and judgements for determining whether a site is suitable.</p>	<p>Change required. Replace the word 'excluded' with the word 'deferred'. Include separate reference to AONB as Stage 2 sites deferred and provide explanation for AONB in Table 5. Additional information is now provided relating to sites deferred in terms of Nature in Appendix 7. Include SB416 as potentially suitable, available and deliverable. Delete reference to Setting (AONB) for purposes of study. These aspects will be considered in more detail in Site Specific Allocations.</p> <p>It would not be appropriate to include AONB and County Wildlife sites at this stage in the process as they are not realistically deliverable without being first subjected to comprehensive</p>

		<p>assessments. The report states at paragraph 6.3 that 'For those sites that have been deferred for the purposes of the SHLAA it should be considered that these sites may still come forward through the development process if they can overcome any constraints such as flooding or ownership issues.'</p> <p>Advice from the Planning Advisory Service regarding a joint methodology indicated that the methodology can be adapted to suit individual authorities.</p>
Environment Agency, Andrew Hunter	We consider that the SHLAA has been completed in accordance with the SHLAA Methodology. We have not performed any testing of the SHLAA to ensure that it is factually correct. However, the contents of the SHLAA report appear to be in order. Further investigative work on possible constraints is likely in relation to those sites carried forward to the Site Specific Allocation Development Plan Document where constraints such as flood risk and land contamination have been identified.	No change. Support and comments noted.
Bidwells	Bidwells has commented previously on the methodology and is generally satisfied that the methodology is in accordance with Government Guidance. For the purposes of SHLAA SB119 and SB120 can be considered as one site for a mixed development of residential, employment and recreational use and necessary facilities to serve the community for the LDF plan period and beyond. The landowners would wish to ensure that any issues are investigated to confirm the suitability of the overall site to accommodate development. It is our opinion that any issues identified through the SHLAA are solvable and can be accommodated within the proposal.	No change. Support and comments noted. For the purposes of the SHLAA it is considered as one site and considered in one worksheet, although both sites are shown on the maps. In terms of the SHLAA the site (SB119 and SB120) is considered as potentially suitable, available and achievable. The details will be considered in the Site Specific Allocations and Core Strategy documents.
Merchant, Martin Blake	Site SB120 - Whilst we would not be averse to participating in a larger urban extension as proposed by the neighbour, we believe that an urban extension in Capel St Mary of 400-500 dwellings is too great. The former orchard, adjacent to the playing field, has excellent potential for residential development and can accommodate the doctor's surgery and 100 dwellings, open space, playing field areas and facilities. The site is	No change. Noted. These details will be considered in the Site Specific Allocations and Core Strategy documents. In terms of the SHLAA this site is considered as potentially suitable, available and achievable.

	available, viable and achievable and therefore extremely deliverable within the 0-10 year time frame. Capel St Mary is a sustainable village.	
Indigo, Sean McGrath	The RSS sets out a target of 5600 dwellings to be delivered by BDC in the period 2001-2021. These targets should be treated as a minimum. We trust our comments will be taken into consideration to help inform the next stages of the LDF. Please keep us informed of any subsequent consultation documents.	Change required. Noted, include a reference to minimum targets in paragraph 2.1.
LSK, Roger Davidson	Both SB2 and SB3 are not subject to any delays that would be likely to affect development or in being brought to the market for sale in the event of ultimately being allocated. Acton is particularly well served with amenities including schooling, employment and shops and both sites are within comfortable walking distance of these. In the event that there is an allocation there would seem to be no reason why, subject to detailed planning permission, SB2 and SB3 could not be brought forward for early development.	No change. Noted, these aspects will be considered in more detail in the Core Strategy and Site Specific Allocations. In terms of the SHLAA these two sites are considered as potentially suitable, available and achievable.

Appendix 9
Babergh SHLAA Sites and Maps