

Planning Committee

08 November 2024

Agenda item number 10

Local Plan- Preparing the Publication Version

Report by Planning Policy Officer

Summary

This report introduces some updated evidence and policies that will support the next version of the Local Plan. These are the Gypsy and Traveller Need Assessment in Great Yarmouth and the Whole Local Plan Viability Assessment.

Recommendations

It is recommended that members endorse:

- i. the Great Yarmouth Borough – Gypsy and Traveller Need Assessment Addendum as evidence for the Local Plan;
 - ii. the Whole Local Plan Viability Appraisal as evidence for the Local Plan;
 - iii. the approach to off-site affordable housing as set out at section 3.2 of this report;
 - iv. all dwellings to be designed to be accessible and adaptable – M4(2) unless site constraints dictate otherwise and
 - v. 10% of affordable housing is designed for wheelchairs - M4(3) standard.
-

1. Introduction

- 1.1. This report introduces some updated evidence and policies that will support the next version of the Local Plan. These are the Gypsy and Traveller Need Assessment in Great Yarmouth and the Whole Local Plan Viability Assessment.

2. Great Yarmouth Borough – Gypsy and Traveller Need Assessment Addendum

- 2.1. The primary objective of this Gypsy and Traveller Accommodation Assessment (GTAA) Update is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Great Yarmouth. Great Yarmouth includes two local planning authority areas; Great Yarmouth Borough and part of the Broads Authority.

- 2.2. This is a partial update to the previous GTAA's that have been completed covering Great Yarmouth Borough and the areas of the Broads Authority in Great Yarmouth. The outcomes of the GTAA have been split to identify figures for the areas of Great Yarmouth that are in the Broads Authority, and the area that is outside of the Broads Authority.
- 2.3. A total of 14 interviews or proxy interviews were completed with Gypsies and Travellers living on sites in Great Yarmouth Borough and a total of 13 interviews with Gypsies and Travellers on sites in the Broads Authority part of Great Yarmouth. No Travelling Showpeople yards were identified in either area.
- 2.4. The study identified the need for Gypsy and Travellers in the Broads Authority part of Great Yarmouth borough until 2041 as 26 pitches in total. There is a current need of 22 pitches and a future need of 4 pitches.
- 2.5. In terms of meeting the need, or the current need, we are investigating how long caravans and residential buildings have been in their current location on the Cobholm Island part of Great Yarmouth using aerials and meeting with representatives on site. We believe that some have been there the requisite period of time to be immune to planning enforcement action and these will be deducted from the 22.
- 2.6. In terms of meeting the residual current need, we are undertaking a call for sites for gypsy and traveller sites.
- 2.7. We will also work with Great Yarmouth Borough Council under the Duty to Cooperate.
- 2.8. For the future need of 4, we will continue to include a criteria-based policy in the Local Plan.

3. Whole Local Plan Viability Appraisal

- 3.1. Three Dragons were commissioned to assess the viability of the proposed policies in the Local Plan. The final report is included at Appendix 2, with technical appendices at Appendix 3.
- 3.2. The study concludes that we can continue to seek off site affordable housing contributions for schemes of fewer than 10 dwellings (as follows) and this will be reflected in the Local Plan affordable housing policy. Whereas the current Local Plan seeks off-site contributions for schemes of 6-9 dwellings, the viability assessment concluded that lower thresholds were viable as follows:
 - 1) Brownfield schemes located on the waterfront: 3-9 dwellings
 - 2) Other brownfield schemes: 5-9 dwellings
 - 3) Greenfield schemes: 3-9 dwellings.
- 3.3. BNG of 20% is found to be viable and this was discussed at the last Planning Committee.

- 3.4. There is an optional Building Regulations standard that a Local Plan can implement relating to accessible and adaptable dwellings, called M4(2) standard. The viability study presumes all dwellings will be built to be accessible and adaptable to changing needs and finds this approach viable. The Local Plan therefore is amended to reflect this, although if site constraints do not permit this, then the standard will not be applied.
- 3.5. The study also assessed the potential for 10% of affordable homes to be designed to be wheelchair accessible (standard M4(3)). This is found to be viable and is included in the Local Plan.
- 3.6. Turning to how the viability assessment has addressed the issue of mitigating nutrient enrichment, it has presumed £3,500 mitigation per dwelling. Taking this into account, the standards discussed in the report and at previous paragraphs of this section are found to be viable.

Author: Natalie Beal

Date of report: 22 October 2024

Appendix 1 – [Great Yarmouth Borough Gypsy and Traveller Accommodation Assessment](#)

Appendix 2 – [Local Plan Viability Assessment Report](#)

Appendix 3 – [Local Plan Viability Assessment Technical Appendices](#)



GREAT YARMOUTH
BOROUGH COUNCIL



Broads
Authority

Great Yarmouth Gypsy and Traveller Accommodation Assessment (GTAA) Update

Final Report

September 2024



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1. EXECUTIVE SUMMARY

Introduction and Methodology

- 1.1 The primary objective of this Gypsy and Traveller Accommodation Assessment (GTAA) Update is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Great Yarmouth. Great Yarmouth includes two local planning authority areas; Great Yarmouth Borough and part of the Broads Authority.
- 1.2 This is a partial update to the previous GTAAs that have been completed covering Great Yarmouth Borough and the areas of the Broads Authority in Great Yarmouth. The GTAA Update provides a credible evidence base which can be used to aid the implementation of Local Plan Policies and, where appropriate, the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the period 2024/25 to 2041/42 to cover both Council's and the Broads Authority's Local Plans periods and the 15-year requirements set out in Planning Policy for Traveller Sites (PPTS) 2023¹.
- 1.3 The outcomes of the GTAA have been split to identify figures for the areas of Great Yarmouth that are in the Broads Authority, and the area that is outside of the Broads Authority.
- 1.4 The GTAA has sought to understand the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population in the area through a combination of desk-based research, and engagement with members of the Travelling Community living on all known sites, yards, and encampments.
- 1.5 A total of 14 interviews or proxy interviews were completed with Gypsies and Travellers living on sites in Great Yarmouth Borough and a total of 13 interviews with Gypsies and Travellers on sites in the Broads Authority part of Great Yarmouth. No Travelling Showpeople yards were identified in either area.
- 1.6 Despite efforts, it was not possible to complete any interviews with households living in bricks and mortar in either Great Yarmouth or the Broads Authority.
- 1.7 The fieldwork for the study was completed between April 2024 and June 2024, and the baseline date for the study is June 2024.

¹ The PPTS planning definition was updated in December 2023. See Chapter 2 for further details.

Key Findings

Pitch Needs – Gypsies and Travellers

- ^{1.8} Overall, the pitch needs for Gypsies and Travellers for the period 2024/25-2041/42 are set out below. Needs are set out for those households that met the 2023 PPTS planning definition of a Gypsy or Traveller; for any undetermined households² where an interview was not able to be completed due to households not being present despite up to three visits to each site; and for those households that did not meet the 2023 PPTS planning definition – although this is not a requirement for a GTAA.
- ^{1.9} Only the need from those households who met the planning definition should be formally considered as need arising from the GTAA. The need arising from households that met the planning definition should be addressed through site allocation/intensification/expansion Local Plan Policies as appropriate, or through consideration of regularising any temporary or unauthorised sites.
- ^{1.10} The Local Planning Authorities will need to carefully consider how to address any need associated with undetermined Travellers, as it is unlikely that all this need will have to be addressed through the provision of conditioned Gypsy or Traveller pitches. In terms of Local Plan Policies, the Local Planning Authorities should consider the use of a criteria-based policy (as suggested in PPTS) for any undetermined households, as well as to deal with any windfall applications, and need from bricks and mortar.
- ^{1.11} In general terms, the need for those households who do not meet the planning definition will need to be addressed as part of general housing need and through separate Local Plan Policies. This approach is specifically referenced in the National Planning Policy Framework (NPPF) 2023.
- ^{1.12} Paragraph 61 of the NPPF sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance, or a locally derived figure in the case of National Parks.
- ^{1.13} Paragraph 63 then states that [emphasis added] *‘Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These grounds should include (but are not limited to) those who require affordable housing; families with children; older people; (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; **travellers**; people who rent their homes and people wishing to commission or build their own homes’*. The footnote to this section states that *‘Planning Policy for Traveller Sites sets out how travellers’ housing needs should be assessed for those covered by the definition in Annex 1 of that document.’*
- ^{1.14} The findings of this report should be considered as part of future housing mix and type within the context of the assessment of overall housing need in relation to Gypsies, Travellers and Travelling Showpeople. Whilst the findings in this report are aggregated totals for the whole of Great Yarmouth and the Broads Authority, due to data protection issues, the Local Planning Authorities have more detailed data to support the preparation of any future Local Plan Policies.

² See Chapter 3 for further information on undetermined households.

Great Yarmouth Borough (excluding the Broads Authority)

- 1.15 There is only one public site in Great Yarmouth borough (excluding the Broads Authority) at Gapton Hall. There were 6 Gypsy or Traveller households that were interviewed that met the 2023 PPTS planning definition and 12 households that did not meet the PPTS planning definition in Great Yarmouth. There were no undetermined households as it was possible to complete an interview with households living on all occupied pitches.
- 1.16 In Great Yarmouth borough there is **no need for any pitches for households that met the 2023 PPTS planning definition**. Whilst the household interviews did identify a current need for 3 pitches for concealed or doubled-up households or adults children, there were a total of 6 vacant pitches on the site.
- 1.17 Given that it was possible to complete interviews with households living on all occupied pitches there is **no need from undetermined households**.
- 1.18 Whilst not now a requirement to include in a GTAA, there is a need in Great Yarmouth borough for **8 pitches for households that did not meet the 2023 PPTS planning definition**. This is made up of 1 doubled-up household; 4 from a 5-year need from teenagers; and 6 from new household formation derived from the demographics of the households that were interviewed. This need has been netted off against a further 3 vacant pitches on the site.
- 1.19 Figure 1 summarises the identified need and
- 1.20 Figure 2 breaks this down by 5-year periods.

Figure 1 – Need for Gypsy and Traveller households in Great Yarmouth borough (excluding the Broads Authority) 2024-41

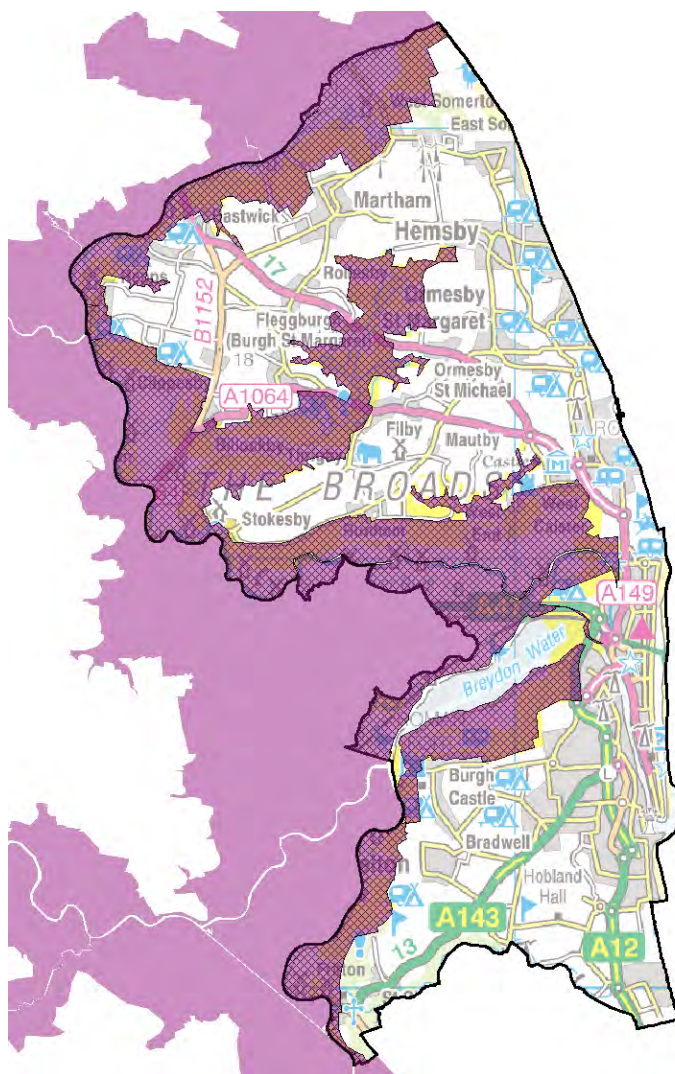
Status	2024 - 2041
Meet Planning Definition	0
Undetermined	0
Do not meet Planning Definition	8
TOTAL	8

Figure 2 – Need for Gypsy and Traveller households in Great Yarmouth borough (excluding the Broads Authority) that met the Planning Definition by year periods

Year Period	Dates	Need
0 – 5	2024 - 28	0
6 – 10	2029 – 33	0
11 – 15	2034 – 38	0
16 – 18	2039 – 41	0
0 – 18	2024 - 41	0

Broads Authority Part of Great Yarmouth Borough

- 1.21 The assessment of need has also covered the parts of the Broads Authority that are located within Great Yarmouth (see map below). There are 9 small unauthorised private Gypsy and Traveller sites located in the Broads Authority part of Great Yarmouth at Cobholm Island.



- 1.22 There were 15 Gypsy or Traveller households that were identified that met the 2023 PPTS planning definition and 2 households that did not meet the planning definition in the Broads Authority part of Great Yarmouth Borough. There were no undetermined households as it was possible to complete an interview with households living on all occupied pitches.
- 1.23 In the Broads Authority part of Great Yarmouth borough there is a need for **24 pitches for households that met the planning definition**. This is made up of 11 unauthorised pitches; 4 concealed/doubled-up households or single adults; 5 from a 5-year need from teenagers; and 4 from new household formation derived from the household demographics.

- ^{1.24} It should be noted that it is understood that several of the unauthorised pitches may have been occupied for over 10 years and therefore may be immune from any enforcement action. The Broads Authority will need to complete additional investigations to determine which of these pitches could be classed as tolerated for planning purposes and this may reduce the levels of identified need.
- ^{1.25} Given that it was possible to complete interviews with households living on all occupied pitches there is **no need from undetermined households**.
- ^{1.26} There is a need for **2 pitches for households that did not meet the planning definition** from 2 unauthorised pitches.
- ^{1.27} Again it should be noted that it is understood that some of the unauthorised pitches may have been occupied for over 10 years and therefore may be immune from any enforcement action. The Broads Authority will need to complete additional investigations to determine which of these pitches could be classed as tolerated for planning purposes and this may reduce the levels of identified need.

Figure 3 summarises the identified need and Figure 4

- ^{1.28} Figure 2 breaks this down by 5-year periods.

Figure 3 - Need for Gypsy and Traveller households in the Broads Authority part of Great Yarmouth borough 2024-41

Status	2024 - 2041
Meet Planning Definition	24
Undetermined	0
Do not meet Planning Definition	2
TOTAL	26

Figure 4 - Need for Gypsy and Traveller households in the Broads Authority part of Great Yarmouth borough that met the Planning Definition by year periods

Year Period	Dates	Need
0 – 5	2024 - 28	20
6 – 10	2029 – 33	1
11 – 15	2034 – 38	2
16 – 18	2039 – 41	1
0 – 18	2023 - 41	24

Plot Needs – Travelling Showpeople

- ^{1.29} There were no Travelling Showpeople identified living on yards in Great Yarmouth or the Broads Authority part of Great Yarmouth so there is no current or future need for plots.

Transit Recommendations

- ^{1.30} Given that there are low numbers of encampments each year and under-utilised public transit pitches it is not recommended that there is a need for another formal public transit site in Great Yarmouth borough at

this time. However, the situation relating to levels of encampments should be monitored to determine if there are any increases in the number of encampments.

- 1.31 As well as information on the size and duration of the encampments, this monitoring should also seek to gather information from residents on the reasons for their stay in the local area; whether they have a permanent base or where they have travelled from; and whether they have any need or preference to settle permanently in the local area. This information could be collected as part of a Welfare Assessment (or similar).
- 1.32 It is recommended that a review of the evidence base relating to encampments, including the monitoring referred to above, should be undertaken on a Norfolk-wide basis. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether a managed approach is preferable.
- 1.33 In the short-term the Local Planning Authorities should continue to use their current approaches when dealing with encampments, and management-based approaches such as negotiated stopping agreements could also be considered.
- 1.34 The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the Local Planning Authority and the (temporary) residents regarding expectations on both sides. See www.negotiatedstopping.co.uk for further information.
- 1.35 Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.

2. INTRODUCTION

- 2.1 The primary objective of this Gypsy and Traveller Accommodation Assessment (GTAA) Update is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in The Borough of Great Yarmouth. Great Yarmouth borough includes two local planning authority areas; Great Yarmouth Borough and parts of the Broads Authority.
- 2.2 This is a partial update to the previous GTAAs that have been completed covering Great Yarmouth Borough and the parts of the Broads Authority in Great Yarmouth. The GTAA Update provides a credible evidence base which can be used to aid the implementation of Local Plan Policies and, where appropriate, the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the period 2024/25 to 2041/42 to cover both the Council's and the Broads Authority's Local Plans periods³ and the 15-year requirements set out in Planning Policy for Traveller Sites (PPTS) 2023⁴.
- 2.3 The outcomes of the GTAA have been split to identify figures for the parts of Great Yarmouth borough that are in the Broads Authority, and the area that is outside of the Broads Authority.
- 2.4 The study provides an evidence base to enable the Local Planning Authorities to comply with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Policy for Traveller Sites (PPTS) 2023, the Housing and Planning Act (2016), the National Planning Policy Framework (NPPF) 2023, and the Planning Practice Guidance (PPG) 2021.
- 2.5 As well as identifying current and future permanent accommodation needs, it also seeks to identify any need for the provision of transit sites or emergency stopping places.
- 2.6 We would note at the outset that the study covers the needs of Gypsies (including English, Scottish, Welsh and Romany Gypsies), Irish Travellers, New (Age) Travellers, and Travelling Showpeople, but for ease of reference we have referred to the study as a Gypsy and Traveller (and Travelling Showpeople) Accommodation Assessment (GTAA).
- 2.7 The baseline date for the study is June 2024, which is when the fieldwork was completed.

Definitions

- 2.8 The only planning definition for a Gypsy, Traveller or Travelling Showperson is set out in PPTS (2023). The previous definitions set out in the Housing Act (2004) were repealed by the Housing and Planning Act (2016).

The Planning Definition in PPTS (2023)

- 2.9 For the purposes of the planning system, the definition was changed in PPTS (2023). The planning definition is set out in Annex 1 and states that:

³ Whilst the Broads Authority Local Plan period is from 2021-2041 the GTAA Update has assumed that supply and demand for the period 2021-2024 net to zero.

⁴ The PPTS planning definition was updated in December 2023. See Chapter 2 for further details.

For the purposes of this planning policy “gypsies and travellers” means:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

In determining whether persons are “gypsies and travellers” for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

a) Whether they previously led a nomadic habit of life.

b) The reasons for ceasing their nomadic habit of life.

c) Whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

For the purposes of this planning policy, “travelling showpeople” means:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.

***Planning Policy for Traveller Sites, Department for Communities and Local Government (DCLG),
December 2023***

- ^{2.10} The key change that was made to both definitions in the December 2023 revision to PPTS was the reintroduction of those who have ceased to travel permanently. These households were excluded from the 2015 PPTS planning definition.

Definition of Travelling

- ^{2.11} One of the most important questions that GTAA’s will need to address in terms of applying the planning definition is *what constitutes travelling?* This has been determined through case law that has tested the meaning of the term ‘nomadic’.
- ^{2.12} **R v South Hams District Council (1994)** – defined Gypsies as “persons who wander or travel for the purpose of making or seeking their livelihood (not persons who travel from place to place without any connection between their movements and their means of livelihood.)” This includes ‘born’ Gypsies and Travellers as well as ‘elective’ Travellers such as New Age Travellers.
- ^{2.13} In **Maidstone BC v Secretary of State for the Environment and Dunn (2006)**, it was held that a Romany Gypsy who bred horses and travelled to horse fairs at Appleby, Stow-in-the-Wold and the New Forest, where he bought and sold horses, and who remained away from his permanent site for up to two months of the year, at least partly in connection with this traditional Gypsy activity, was entitled to be accorded Gypsy status.

- ^{2.14} In **Greenwich LBC v Powell (1989)**, Lord Bridge of Harwich stated that a person could be a statutory Gypsy if he led a nomadic way of life *only seasonally*.
- ^{2.15} The definition was widened further by the decision in **R v Shropshire CC ex p Bungay (1990)**. The case concerned a Gypsy family that had not travelled for some 15 years in order to care for its elderly and infirm parents. An aggrieved resident living in the area of the family's recently approved Gypsy site sought judicial review of the Local Authority's decision to accept that the family had retained their Gypsy status even though they had not travelled for some considerable time. Dismissing the claim, the judge held that a person could remain a Gypsy even if he or she did not travel, provided that their nomadism was held in abeyance and not abandoned.
- ^{2.16} That point was revisited in the case of **Hearne v National Assembly for Wales (1999)**, where a traditional Gypsy was held not to be a Gypsy for the purposes of planning law as he had stated that he intended to abandon his nomadic habit of life, lived in a permanent dwelling and was taking a course that led to permanent employment.
- ^{2.17} **Wrexham County Borough Council v National Assembly of Wales and Others (2003)** determined that households and individuals could continue to lead a nomadic way of life with a permanent base from which they set out from and return to.
- ^{2.18} The implication of these rulings in terms of applying the planning definition is that it will only include those who travel for work purposes, or for seeking work, and in doing so stay away from their usual place of residence. It can include those who have a permanent site or place of residence, but that it will not include those who have never travelled for work, or those who have never travelled. It will not cover those who commute to work daily from a permanent place of residence (see **APP/E2205/C/15/3137477**).
- ^{2.19} It may also be that within a household some family members travel for nomadic purposes on a regular basis, but other family members stay at home to look after children in education, or other dependents with health problems etc. In these circumstances the household unit would be defined as travelling under the planning definition.
- ^{2.20} Households will also fall under the planning definition if they can demonstrate that they have ceased to travel temporarily or permanently as a result of their own or their family's or dependants' educational, health needs or old age. In order to have ceased to travel temporarily or permanently these households will need to demonstrate that they have travelled for work, or for seeking work, in the past.
- ^{2.21} This approach was endorsed by a Planning Inspector in Decision Notice for an appeal in East Hertfordshire (**Appeal Ref: APP/J1915/W/16/3145267**) that was issued in December 2016. A summary can be seen below.

Case law, including the R v South Hams District Council ex parte Gibb (1994) judgment referred to me at the hearing, despite its reference to ‘purposive activities including work’ also refers to a connection between the travelling and the means of livelihood, that is, an economic purpose. In this regard, there is no economic purpose... This situation is no different from that of many landlords and property investors or indeed anyone travelling to work in a fixed, pre-arranged location. In this regard there is not an essential connection between wandering and work... Whilst there does appear to be some connection between the travel and the work in this regard, it seems to me that these periods of travel for economic purposes are very short, amounting to an extremely small proportion of his time and income. Furthermore, the work is not carried out in a nomadic manner because it seems likely that it is done by appointment... I conclude, therefore, that XX does not meet the definition of a gypsy and traveller in terms of planning policy because there is insufficient evidence that he is currently a person of a nomadic habit of life.

^{2.22} This was further reinforced in a Decision Notice for an appeal in Norfolk that was issued in February 2018 (**Ref: APP/V2635/W/17/3180533**) that stated:

As discussed during the hearing, although the PPTS does not spell this [the planning definition] out, it has been established in case law (R v South Hams DC 1994) that the nomadism must have an economic purpose. In other words, gypsies and travellers wander or travel for the purposes of making or seeking their livelihood.

Legislation and Guidance for Gypsies and Travellers

^{2.23} Decision-making for policy concerning Gypsies, Travellers and Travelling Showpeople sits within a complex legislative and national policy framework and this study must be viewed in the context of this legislation and guidance. For example, the following key pieces of legislation and guidance are relevant when developing policies relating to Gypsies, Travellers and Travelling Showpeople:

- » The Housing Act, 1985
- » Planning Policy for Traveller Sites (PPTS), 2023
- » The Housing and Planning Act, 2016
- » National Planning Policy Framework (NPPF), 2023
- » Planning Practice Guidance⁵ (PPG), 2021

^{2.24} In addition, Case Law, Ministerial Statements, the outcomes of Local Plan Examinations and Planning Appeals, and Judicial Reviews need to be taken into consideration. Relevant examples have been included in this report.

^{2.25} The primary guidance for undertaking the assessment of housing need for Gypsies, Travellers and Travelling Showpeople is set out in the 2023 PPTS. It should be read in conjunction with the National Planning Policy

⁵ With particular reference to the sections on Housing needs of different groups (May 2021).

Framework (NPPF) 2023. In addition, the Housing and Planning Act (2016) makes provisions for the assessment of need for those Gypsy, Traveller and Travelling Showpeople households living on sites and yards who do not meet the planning definition – through the assessment of all households living in caravans.

Planning Policy for Traveller Sites (PPTS) 2023

^{2.26} PPTS (2023), sets out the direction of Government policy. As well as introducing the planning definition of a Traveller, PPTS is closely linked to the NPPF. Among other objectives, the aims of the policy in respect of Traveller sites are (PPTS Paragraph 4):

- » Local planning authorities should make their own assessment of need for the purposes of planning.
- » To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.
- » To encourage local planning authorities to plan for sites over a reasonable timescale.
- » That plan-making and decision-taking should protect Green Belt from inappropriate development.
- » To promote more private Traveller site provision while recognising that there will always be those Travellers who cannot provide their own sites.
- » That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.
- » For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies.
- » To increase the number of Traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply.
- » To reduce tensions between settled and Traveller communities in plan-making and planning decisions.
- » To enable provision of suitable accommodation from which Travellers can access education, health, welfare, and employment infrastructure.
- » For local planning authorities to have due regard to the protection of local amenity and local environment.

^{2.27} In practice, the document states that (PPTS Paragraph 9):

- » Local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople, which address the likely permanent and transit site accommodation needs of Travellers in their area, working collaboratively with neighbouring local planning authorities.

^{2.28} PPTS goes on to state (Paragraph 10) that in producing their Local Plan, local planning authorities should:

- » Identify and annually update a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets.
- » Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.

- » Consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a Duty-to-Cooperate on strategic planning issues that cross administrative boundaries).
- » Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density.
- » Protect local amenity and environment.

^{2.29} Local Authorities now have a duty to ensure a 5-year land supply to meet the identified needs for Traveller sites. However, PPTS also notes in Paragraph 11 that:

- » Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria-based policies should be fair and should facilitate the traditional and nomadic life of Travellers, while respecting the interests of the settled community.

National Planning Policy Framework (NPPF) 2023

^{2.30} The most recent version of the National Planning Policy Framework was issued in December 2023. Paragraph 61 of the NPPF sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance, or a locally derived method in the case of National Parks.

^{2.31} Paragraph 63 then states that [emphasis added] '*Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These grounds should include (but are not limited to) those who require affordable housing; families with children; older people; (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes*'. The footnote to this section states that '*Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.*'

^{2.32} This sets out that the needs of households that meet the planning definition should be assessed under the PPTS and that the needs of households that are not found to meet the planning definition should be assessed as part of the wider housing needs of an area.

^{2.33} In an Appeal Decision that was published in March 2020 for an appeal in Central Bedfordshire (**APP/P0240/C/18/3213822**) the Inspector concluded in relation to the then Paragraph 61 of the NPPF (now paragraph 62) that:

It seems to me that this wording makes clear that it is only those meeting that definition that should be included in an assessment of need for 'planning definition' travellers and that gypsies who have ceased travelling should be counted and provided for elsewhere and this is the approach proposed in the emerging Local Plan. This does not, of course mean that these gypsies should be allocated 'bricks and mortar' type housing. They will also need a suitable supply of caravan sites to meet their needs.

Levelling-up and Regeneration Act (2023)

^{2.34} Among other things, this Act seeks to make provision about town and country planning. The Act received Royal Assent in October 2023. Whilst there is currently no specific reference to changes to policy and guidance for Gypsies and Travellers, the Local Planning Authorities may need to consider the outcomes of any changes to planning legislation that may impact on the accommodation needs of Gypsies and Travellers. In addition, the Act will seek to abolish the Duty to Cooperate that was introduced by the Localism Act in 2011.

Lisa Smith v The Secretary of State for Levelling Up, Housing & Communities and others [2022]

^{2.35} In October 2022 the Court of Appeal handed down judgment in *Lisa Smith v The Secretary of State for Levelling Up, Housing & Communities [2022] EWCA Civ 1391*. The case was a challenge to a specific appeal decision and concerned whether the planning definition of Gypsies and Travellers contained in Annex 1 of the PPTS (2015) is discriminatory against Travellers who are settled and who no longer travel for work due to old age or disability. The Court of Appeal allowed the appeal and quashed the Inspectors decision from 2018 and referred the case back to The Secretary of State for redetermination.

^{2.36} Whilst certain parts of the PPTS planning definition of a Traveller were found to be discriminatory, as the PPTS 2015 itself was not the subject of the case it has not been quashed or declared unlawful at this time.

^{2.37} As a result of the Lisa Smith Judgement the Government made changes to the PPTS in December 2023 to reintroduce those who have ceased to travel permanently under the definition.

3. METHODOLOGY

Background

- 3.1 Over the past 10 years, ORS has continually refined a methodology for undertaking robust and defensible Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessments. This has been updated in light of changes to the 2015 PPTS, the 2023 PPTS, the Housing and Planning Act (2016), the NPPF (2023), and the PPG (2021). It has also responded to changes set out by Planning Ministers, with particular reference to new household formation rates. This is an evolving methodology that has been adaptive to changes in planning policy as well as the outcomes of Local Plan Examinations and Planning Appeals.
- 3.2 PPTS contains a number of requirements for local authorities which must be addressed in any GTAA methodology. This includes the need to pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves); identification of permanent and transit site accommodation needs separately; working collaboratively with neighbouring local planning authorities; and establishing whether households fall within the planning definition for Gypsies, Travellers and Travelling Showpeople.
- 3.3 ORS would note that the ORS GTAA methodology has been repeatedly found to be sound and robust, including through Local Plan Examinations in Bedford, Brentwood, Cambridge, Castle Point, Central Bedfordshire, Cheltenham, Cotswold, Daventry, East Hertfordshire, Gloucester, Maldon, Milton Keynes, Newham, Runnymede, South Cambridgeshire, South Northamptonshire, Tewkesbury, and Waverley.
- 3.4 An Appeal Decision for a Hearing in Central Bedfordshire (**APP/P0240/C/18/3213822**) that was issued in March 2020 concluded:

'...whilst there have been some queries in previous appeal decisions over the conclusions of other GTAAs produced by ORS, the methodology, which takes into account the revisions made in 2015 to the Government's Planning Policy for Traveller Sites (PPTS), has nevertheless been accepted by Inspectors in a considerable number of Local Plan Examinations.'

- 3.5 The Inspector for the East Herts District Plan also found the evidence base in relation to Gypsies and Travellers to be sound in her Inspection Report that was issued in July 2018. She concluded:

'The need of the travelling community has been carefully and robustly assessed and locations to meet identified needs have been allocated for the plan period. Policy HOU9 sets out the need for 5 permanent pitches for Gypsies and Travellers... the approach to the provision of housing is comprehensive, positively prepared, appropriate to the needs of the area and consistent with national policy.'

- 3.6 The stages below provide a summary of the methodology that was used to complete this study. More information on each stage is provided in the appropriate sections of this report.

Desk-Based Review

3.7 ORS collated a range of secondary data that was used to support the study. This included:

- » Census data.
- » Traveller Caravan Count data.
- » Planning history for existing sites.
- » Records of unauthorised sites/encampments.
- » Information on planning applications/appeals.
- » Information on enforcement actions.
- » Existing Needs Assessments and other relevant local studies.
- » Existing national and local policy, guidance, and best practice.

Stakeholder Engagement

3.8 Whilst no formal interviews with wider stakeholders were completed for this GTAA Update, detailed discussions were held with key Council and Broads Authority Officers to determine any changes since the previous GTAA was completed.

Working Collaboratively with Neighbouring Planning Authorities

3.9 As this was an update of an existing GTAA there was no formal engagement programme completed with neighbouring planning authorities.

Survey of Travelling Communities

3.10 Through the desk-based research and the discussions with Officers from the Council and the Broads Authority, ORS sought to identify all authorised and unauthorised sites/yards and encampments in the study area and attempted to complete an interview with the residents on all occupied pitches and plots. In order to gather the robust information needed to assess households against the planning definition of a Traveller, up to 3 attempts were made to contact households where it was not initially possible to conduct an interview because they were not available at the time.

3.11 Our experience suggests that an attempt to interview households on all pitches is more robust. A sample-based approach often leads to an under-estimate of need – and is an approach which is regularly challenged by the Planning Inspectorate and at Planning Appeals.

3.12 ORS worked closely with the Local Planning Authorities to ensure that the interviews collected all the necessary information to support the study. The site interview questions that were used (see **Appendix D: Households that did not meet the Planning DefinitionF**) take account of changes to PPTS in 2023 and collect the information ORS feel is necessary to apply the current planning definition of a Traveller.

- 3.13 All interviews were completed by members of our dedicated team of experienced Researchers who work on our GTAA studies across England and Wales. Researchers attempted to conduct semi-structured interviews with residents to determine their current demographic characteristics, their current or future accommodation needs, whether there is any over-crowding or the presence of concealed households and travelling characteristics. They used the ORS households interview questions (see **Appendix F**) as the basis for their discussions. ORS Researchers also sought to identify contacts living in bricks and mortar to interview, as well as an overall assessment of each site to determine any opportunities for intensification or expansion to meet future needs.
- 3.14 Researchers also sought information from residents on the type of pitches they may require in the future – for example private or socially rented, together with any features they may wish to be provided on a new pitch or site.
- 3.15 Where it was not possible to undertake an interview, Researchers sought to capture as much information as possible about each pitch through a proxy interview from sources including neighbouring residents and site management (if present).

Engagement with Bricks and Mortar Households

- 3.16 The 2021 Census recorded 52 households who identified as either Gypsies or Irish Travellers, or Roma who lived in a house or bungalow in Great Yarmouth borough and 39 living in a flat or maisonette.
- 3.17 ORS apply a rigorous approach to making contact with bricks and mortar households as this is a common issue raised at Local Plan Examinations and Planning Appeals. Contacts were sought through a range of sources including the interviews with people on existing sites and yards; intelligence from discussions with Council Officers and Officers from the Broads Authority – including any households on the waiting list for the public site. Through this approach the GTAA endeavoured to do everything to give households living in bricks and mortar the opportunity to make their views known.
- 3.18 As a rule, ORS do not make any assumptions on the overall needs from household in bricks and mortar based on the outcomes of any interviews that are completed, as in our experience this leads to a significant over-estimate of the number of households wishing to move to a site or a yard.

Timing of the Fieldwork

- 3.19 ORS are fully aware of the transient nature of many travelling communities and subsequent seasonal variations in site and yard occupancy. ORS would normally aim to complete fieldwork during the non-travelling season, and also to avoid days of known local or national events. The fieldwork and review of previous fieldwork was completed between May 2023 and June 2024 and Researchers were able to collect information for residents living on sites in Great Yarmouth borough.

Applying the PPTS Planning Definition

- ^{3.20} The primary change to PPTS in December 2023 in relation to the assessment of need was the change to the definition of a Gypsy, Traveller or Travelling Showperson for planning purposes. Through the site interviews ORS sought to collect information necessary to assess each household against the planning definition. There are a number of relevant appeal decisions that have been issued by the Planning Inspectorate on how the planning definition should be applied (see Paragraphs 2.20 and 2.21 for examples) – these support the view that households need to be able to demonstrate that they travel for work purposes, or for seeking work, to meet the planning definition, and stay away from their usual place of residence when doing so, or have ceased to travel for work purposes temporarily or permanently due to education, ill health or old age.
- ^{3.21} The household survey included a structured section of questions to record information about the travelling characteristics of household members. This included questions on the following key issues:
- » Whether any household members have travelled in the past 12 months.
 - » Whether household members have ever travelled.
 - » The reasons for travelling.
 - » Where household members travelled to and for how long.
 - » The times of the year that household members travelled.
 - » Where household members stay when they are away travelling.
 - » When household members stopped travelling.
 - » The reasons why household members stopped travelling.
 - » Whether household members intend to travel again in the future.
 - » When and the reasons why household members plan to travel again in the future.
- ^{3.22} When the household interviews were completed, the answers from the questions on travelling were used to determine the status of each household against the planning definition in PPTS 2023. Through a combination of responses, households need to provide sufficient information to demonstrate that household members travel for work purposes, or for seeking work, and in doing so stay away from their usual place of residence, or that they have ceased to travel temporarily or permanently due to education, ill health or old age. This included information on the type of work that is undertaken; which family members travelled for work; the times of the year that family members travelled for work; the duration of the trips for work; and where the family members stay when travelling away from home for work. A similar definition applies to Travelling Showpeople as to Gypsies and Travellers.
- ^{3.23} Households that need to be formally considered in the GTAA fall under one of three classifications. Only those households that meet, or may meet, the planning definition will form the components of need to be formally included in the GTAA:
- » Households that travel under the planning definition.
 - » Households that have ceased to travel temporarily or permanently under the planning definition.
 - » Households where an interview was not possible who may fall under the planning definition.
- ^{3.24} Whilst the needs of those households that do not meet the planning definition do not need to be included in the GTAA, they have been assessed to provide the Local Planning Authorities with components of need to

consider as part of their work on wider housing needs assessments. This is consistent with the requirements of the NPPF (2023).

Undetermined Households

- ^{3.25} As well as calculating need for households that meet the planning definition, a GTAA has to consider the needs of any households where an interview was not able to be completed (either due to refusal to be interviewed or households that were not present during the fieldwork period). Whilst there is no guidance that sets out how the needs of these households should be addressed; an approach was taken that sought an estimate of potential need from these households. This is an additional need figure over and above the need identified for households that meet the planning definition.
- ^{3.26} The estimate sought to identify potential current and future need from any pitches known to be temporary or unauthorised, and through new household formation. As the demographics of any undetermined households are unknown, the ORS national household formation rate of 1.50% has been used. In addition, need from concealed-doubled-up households and from teenagers has been modelled based on the outcomes from completed interviews.
- ^{3.27} ORS believe it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether households where an interview was not completed meet the planning definition based on the outcomes of households where an interview was completed.
- ^{3.28} However, data that has been collected from over 5,500 household interviews that have been completed by ORS across England since the changes to PPTS in 2015 suggests that overall, approximately 30% of households who have been interviewed meet the planning definition (this rises to 70% for Travelling Showpeople based on over 500 interviews that have been completed) – and in some local authorities, no households meet the planning definition.
- ^{3.29} ORS are not implying that this is an official national statistic - rather a national statistic based on the outcomes of our fieldwork since the introduction of PPTS (2015). It is estimated that there are 14,000 Gypsy and Traveller pitches in England and ORS have spoken with households on approximately 40% of them at a representative range of sites. Approximately 30% meet the planning definition. It is ORS' view therefore that this is the most comprehensive national statistic in relation to households that meet the planning definition in PPTS (2023) and should be seen as a robust statistical figure.
- ^{3.30} This suggests that only a proportion of any need identified from undetermined households would need to be considered alongside need from households that met the planning definition, and that the remaining needs from undetermined households will have to be addressed through separate Local Plan Policies, alongside need from households that did not meet the planning definition.
- ^{3.31} The ORS methodology to address the need arising from undetermined households was supported by the Planning Inspector for a Local Plan Examination for Maldon District Council, Essex. In his Report that was published on 29th June 2017 he concluded:

The Council's stance is that any need arising from 'unknowns' should be a matter left to the planning application process. Modifications to Policy H6 have been put forward by the Council setting out criteria for such a purpose, which I consider further below. To my mind, that is an appropriate approach. While there remains a possibility that up to 10 further pitches may be needed, that cannot be said to represent identified need. It would be unreasonable to demand that the Plan provide for needs that have not been established to exist.

Households that Do Not Meet the Planning Definition

^{3.32} Households who do not travel for work, or have never travelled, now fall outside of the planning definition of a Traveller set out in PPTS (2023). However Romany Gypsies, Irish and Scottish Travellers may be able to claim a right to culturally appropriate accommodation under the Equality Act (2010) as a result of their protected characteristics. In addition, provisions set out in the Housing and Planning Act (2016) now include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored. Draft Guidance⁶ related to this section of the Act has been published setting out how the government would want local housing authorities to undertake this assessment and it is the same as the GTAA assessment process. The implication is therefore that the housing needs of any Gypsy and Traveller households who do not meet the planning definition of a Traveller will need to be assessed as part of the wider housing needs of the area and will form a subset of the wider need arising from households residing in caravans. This is echoed in the NPPF (2023).

^{3.33} Paragraph 63 of the NPPF states that [emphasis added]:

'Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These grounds should include (but are not limited to) those who require affordable housing; families with children; older people; (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes'. The footnote to this section states that 'Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.'

⁶ Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats. DCLG (March 2016).

Calculating the Current and Future Need

^{3.34} To identify need, PPTS requires an assessment for current and future pitch requirements but does not provide a methodology for this. However, as with any housing assessment, the underlying calculation can be broken down into a relatively small number of factors. In this case, the key issue is to compare the supply of pitches available for occupation with the current and future needs of the population.

Supply of Pitches

^{3.35} The first stage of the assessment sought to determine the number of occupied, vacant, and potentially available supply in the study area:

- » Current vacant pitches.
- » Pitches currently with planning consent due to be developed within 5 years.
- » Pitches vacated by people moving to housing.
- » Pitches vacated by people moving from the study area (out-migration).

^{3.36} It is important when seeking to identify supply from vacant pitches that they are in fact available for general occupation – i.e. on a public or social rented site, or on a private site that is run on a commercial basis with anyone being able to rent a pitch if they are available. Typically, vacant pitches on small private family sites are not included as components of available supply but can be used to meet any current and future need from the family living on the site.

Current Need

^{3.37} The second stage was to identify components of current need, which is not necessarily the need for pitches because they may be able to be addressed by space already available in the study area. It is important to address issues of double counting:

- » Households on unauthorised developments for which planning permission is not expected.
- » Concealed, doubled-up or over-crowded households (including single adults).
- » Teenage children in need of a pitch of their own in the next 5 years.
- » In-migration/roadside.
- » Households in bricks and mortar needing to move to sites.
- » Households in need on waiting lists for public sites.

Future Need

^{3.38} The final stage was to identify components of future need. This includes the following components:

- » Households living on sites with temporary planning permission.
- » New household formation.

^{3.39} Household formation rates are often the subject of challenge at appeals or examinations. ORS firmly believe that any household formation rates should use a robust local evidence base, rather than simply relying on national precedent. The approach taken is set out in more detail in Chapter 6 of this report.

- 3.40 ORS are also increasingly identifying households and adult household members who have been forced to leave sites due to over-crowding or exceeding planning conditions on the number of caravans permitted on sites. These households are typically living on the roadside or doubling-up on pitches in neighbouring local authorities. ORS include these households as components of hidden need and term them displaced in-migration.
- 3.41 All of these components of supply and need are presented in tabular format which identify the overall net need for current and future accommodation for Gypsies, Travellers and Travelling Showpeople. This has proven to be a robust model for identifying needs. The residential and transit pitch needs for Gypsies and Travellers and Travelling Showpeople are identified separately, and the needs are to 2041.

Pitch Turnover

- 3.42 Some assessments of need make use of pitch turnover as an ongoing component of supply. ORS do not agree with this approach or about making any assumptions about annual turnover rates. This approach frequently ends up significantly under-estimating need as, in the majority of cases, vacant pitches on sites are not available to meet any local need. The use of pitch turnover has been the subject of a number of Inspectors Decisions, for example **APP/J3720/A/13/2208767** found a GTAA to be unsound when using pitch turnover and concluded:

West Oxfordshire Council relies on a GTAA published in 2013. This identifies an immediate need for 6 additional pitches. However, the GTAA methodology treats pitch turnover as a component of supply. This is only the case if there is net outward migration, yet no such scenario is apparent in West Oxfordshire. Based on the evidence before me I consider the underlying criticism of the GTAA to be justified and that unmet need is likely to be higher than that in the findings in the GTAA.

- 3.43 In addition, Best Practice for Assessing the Accommodation Needs of Gypsies and Travellers⁷ produced jointly in June 2016 by organisations including Friends, Families and Travellers, the London Gypsy and Traveller Unit, the York Travellers Trust, the Derbyshire Gypsy Liaison Group, Garden Court Chambers and Leeds GATE concluded that:

Assessments involving any form of pitch turnover in their supply relies upon making assumptions, a practice best avoided. Turnover is naturally very difficult to assess accurately and in practice does not contribute meaningfully to additional supply so should be very carefully assessed in line with local trends. Mainstream housing assessments are not based on the assumption that turnover within the existing stock can provide for general housing needs.

- 3.44 As such, other than current vacant pitches on sites that are known to be available, or pitches that are known to become available through the household interviews, pitch turnover has not been considered as a component of supply in this GTAA.

⁷ See www.londongypsiesandtravellers.org.uk/resources/ for details.

Transit Provision

^{3.45} GTAA studies require the identification of demand for transit provision. While the majority of Gypsies and Travellers have permanent bases either on Gypsy and Traveller sites or in bricks and mortar and no longer travel, other members of the community either travel permanently or for part of the year. Due to the mobile nature of the population a range of sites can be developed to accommodate Gypsies and Travellers as they move through different areas.

- » **Transit sites** - full facilities where Gypsies and Travellers might live temporarily (for up to three months) – for example, to work locally, for holidays or to visit family and friends.
- » **Emergency stopping places** - more limited facilities.
- » **Temporary sites and stopping places** - only temporary facilities to cater for an event.
- » **Negotiated stopping places** - agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time.

^{3.46} Transit sites serve a specific function of meeting the needs of Gypsy and Traveller households who are visiting an area or who are passing through on the way to somewhere else. A transit site typically has a restriction on the length of stay of usually around 12 weeks and has a range of facilities such as water supply, electricity, and amenity blocks.

^{3.47} An alternative to or in addition to a transit site is an emergency stopping place. This type of site also has restrictions on the length of time for which someone can stay on it but has much more limited facilities with typically only a source of water and chemical toilets provided.

^{3.48} Another alternative is 'negotiated stopping'. The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the authority and the (temporary) residents regarding expectations on both sides.

^{3.49} Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.

^{3.50} The Criminal Justice and Public Order Act 1994 (Section 62a) is particularly important with regard to the issue of Gypsy and Traveller transit site provision. Section 62a of the Act allows the police to direct trespassers to remove themselves and their vehicles and property from any land where a suitable transit pitch on a relevant caravan site is available within the same local authority area (or within the county in two-tier local authority areas).

^{3.51} Consideration will also have to be given to the Police, Crime, Sentencing and Courts Act which came in to force in June 2022. Part 4 of the Act gives the Police additional powers to deal with unauthorised encampments through new offences relating to residing on land without consent in or with a vehicle and new powers in relation to the seizure of property.

^{3.52} In order to investigate the potential need for transit provision when undertaking work to support the study, ORS sought to undertake analysis of any records of unauthorised sites and encampments, as well as information from the Ministry for Housing, Communities and Local Government (MHCLG) Traveller Caravan Count. The outcomes of the discussions with Council and Broads Authority Officers were also taken into consideration when determining this element of need in the study area.

4. GYPSY, TRAVELLER & TRAVELLING SHOWPEOPLE SITES AND POPULATION

Introduction

- 4.1 One of the main considerations of this study is to provide evidence to support the provision of pitches and plots to meet the current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople. A pitch is an area normally occupied by one household, which typically contains enough space for one or two caravans but can vary in size⁸. A site is a collection of pitches which form a development exclusively for Gypsies and Travellers. For Travelling Showpeople, the most common descriptions used are a plot for the space occupied by one household and a yard for a collection of plots which are typically exclusively occupied by Travelling Showpeople. Throughout this study the main focus is upon how many extra pitches for Gypsies and Travellers and plots for Travelling Showpeople are required in the study area.
- 4.2 The public and private provision of mainstream housing is also largely mirrored when considering Gypsy and Traveller accommodation. One common form of a Gypsy and Traveller site is the publicly provided residential site, which is provided by a Local Authority or by a Registered Provider (usually a Housing Association). Pitches on public sites can be obtained through signing up to a waiting list, and the costs of running the sites are met from the rent paid by the tenants (similar to social housing).
- 4.3 The alternative to a public residential site is a private residential site and yard for Gypsies, Travellers and Travelling Showpeople, respectively. These result from individuals or families buying areas of land and then obtaining planning permission to live on them. Households can also rent pitches on existing private sites. Therefore, these two forms of accommodation are the equivalent to private ownership and renting for those who live in bricks and mortar housing. Generally, the majority of Travelling Showpeople yards are privately owned and managed.
- 4.4 The Gypsy, Traveller and Travelling Showpeople population also has other types of sites due to its mobile nature, as described more fully in Chapter 3 above. Transit sites tend to contain many of the same facilities as a residential site, except that there is a maximum occupancy period of residence which can vary from a few days or weeks to a period of months. An alternative to a transit site is an emergency or negotiated stopping place. This type of site also has restrictions on the length of time someone can stay on it but has much more limited facilities. Both of these two types of site are designed to accommodate, for a temporary period, Gypsies, Travellers and Travelling Showpeople whilst they travel. A number of authorities also operate an accepted encampments policy where short-term stopovers are tolerated without enforcement action.
- 4.5 Further considerations for the Gypsy and Traveller population are unauthorised developments and encampments. Unauthorised developments occur on land which is owned by the Gypsies and Travellers or

⁸ Whilst it has now been withdrawn, *Government Guidance on Designing Gypsy and Traveller Sites* recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer [a static caravan or park home for example] and touring caravan, parking space for two vehicles and a small garden area.

with the approval of the landowner, but for which they do not have planning permission to use for residential purposes. Unauthorised encampments occur on land which is not owned by the Gypsies and Travellers.

Sites and Yards

4.6 In Great Yarmouth borough (excluding the Broads Authority), on the base date for the GTAA, there was:

- » 1 public site (18 permanent pitches and 6 transit pitches)⁹.

4.7 See **Appendix E**: Site and Yard list for further details.

Figure 5 - Total amount of provision in Great Yarmouth (excluding the Broads Authority) June 2024

Category	Sites/Yards	Pitches/Plots
Public sites	0	0
Private with permanent planning permission	1	18
Private with temporary planning permission	0	0
Tolerated pitches	0	0
Unauthorised sites	0	0
Public transit pitches	0	6
Travelling Showpeople yards	0	0
TOTAL	1	24

4.8 In the Broads Authority part of Great Yarmouth, on the base data for the GTAA, there were:

- » 9 unauthorised sites (13 pitches)

Figure 6 - Total amount of provision in the Broads Authority part of Great Yarmouth borough June 2024

Category	Sites/Yards	Pitches/Plots
Public sites	0	0
Private with permanent planning permission	0	0
Private with temporary planning permission	0	0
Tolerated pitches	0	0
Unauthorised sites	9	13
Public transit sites	0	0
Travelling Showpeople yards	0	0
TOTAL	9	13

⁹ 3 of these pitches allow for permanent occupancy.

MHCLG Traveller Caravan Count

- ^{4.9} Another source of information available on the Gypsy, Traveller and Travelling Showpeople population is the bi-annual Traveller Caravan Count which is conducted by each Local Authority in England on a specific date in January and July of each year and reported to the MHCLG. This is a statistical count of the number of caravans on both authorised and unauthorised sites across England. With effect from July 2013, the Gypsy and Traveller Caravan Count was renamed the Traveller Caravan Count due to the inclusion of information on Travelling Showpeople caravans.
- ^{4.10} As this count is of caravans and not households, it makes it more difficult to interpret for a study such as this because it does not count pitches or resident households. The count is merely a 'snapshot in time' conducted by the Local Authority on a specific day, and any unauthorised sites or encampments which occur on other dates will not be recorded. Likewise, any caravans that are away from sites on the day of the count will not be included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the calculation of current and future need as the information collected during the site visits is seen as more robust and fit-for-purpose. However, the Caravan Count data has been used to support the identification of the need to provide for transit provision and this is set out later in this report.
- ^{4.11} The most recent Traveller Caravan Count in January 2024 recorded 26 caravans on socially rented sites. The Caravan Count does not separate out information for the Broads Authority part of Great Yarmouth.

5. SURVEY OF TRAVELLING COMMUNITIES

Interviews with Gypsies and Travellers

- 5.1 One of the major components of this study was a detailed survey of the Gypsy and Traveller population living in the study area, and also efforts to engage with the bricks and mortar community.
- 5.2 In Great Yarmouth borough (excluding the Broads Authority), at the base date for the GTAA, there was 1 public Gypsy and Traveller site with 18 permanent pitches and 6 public transit pitches.
- 5.3 See **Appendix E: Site and Yard list** for further details.
- 5.4 The table below set out the number of pitches/plots, the number of interviews that were completed, and any reasons why interviews were not able to be completed.

Figure 7 – Interviews completed in Great Yarmouth borough (excluding the Broads Authority)

Site Status	Pitches/ Plots	Interviews	Reasons for not completing interviews/additional interviews
Public Sites			
Gapton Hall	18	12	6 x vacant
Private Sites			
None	-	-	-
Temporary Sites			
None	-	-	-
Tolerated Sites			
None	-	-	-
Unauthorised Sites			
None	-	-	-
Public Transit Pitches			
Gapton Hall	6	2	1 x double pitch, 3 x vacant
TSP			
None	-	-	-
TOTAL	24	14	

- 5.5 In the Great Yarmouth part of the Broads Authority, at the base date for the GTAA, there were 9 unauthorised sites. See **Appendix E: Site and Yard list** for further details. The table below set out the number of pitches/plots, the number of interviews that were completed, and any reasons why interviews were not able to be completed.

Figure 8 - Interviews completed in the Broads Authority part of Great Yarmouth borough

Site Status	Pitches/ Plots	Interviews	Reasons for not completing interviews/additional interviews
Public Sites			
None	-	-	-
Private Sites			
None	-	-	-
Temporary Sites			
None	-	-	-
Tolerated Sites			
None	-	-	-
Unauthorised Sites ¹⁰			
Blackgate Farm	1	1	-
Blackgate Stables	1	1	-
Corner Plot	1	1	-
Hunters Lodge/Maple Lodge	2	2	-
Land north of The Lodge	1	1	-
New Cut Farm (rear of retail park)	3	3	-
Sequoia Lodge	1	1	-
Sheltanlee Stud	2	2	-
The Lodge	1	1	-
Public Transit Sites			
None	-	-	-
TSP			
None	-	-	-
TOTAL	13	13	

¹⁰ Some of the interviews that were completed on these sites were proxy interviews.

6. CURRENT AND FUTURE PITCH PROVISION

Introduction

- 6.1 This section focuses on the pitch provision which is needed in the study area currently and to 2041. This includes both current unmet need and need which is likely to arise in the future¹¹. This time period allows for robust forecasts of the requirements for future provision, based upon the evidence contained within this study and also secondary data sources. Whilst the difficulty in making accurate assessments beyond 5 years has been highlighted in previous studies, the approach taken in this study to estimate new household formation has been accepted by Planning Inspectors as the most appropriate methodology to use.
- 6.2 We would note that this section is based upon a combination of the on-site surveys, planning records and the outcomes of discussions with Council Officers and Officers from the Broads Authority. In many cases, the survey data is not used in isolation, but instead is used to validate information from planning records or other sources.
- 6.3 This section concentrates not only upon the total provision, which is required in the area, but also whether there is a need for any transit sites and/or emergency stopping place provision.

New Household Formation Rates

- 6.4 Nationally, a household formation and growth rate of 3.00% net per annum¹² has been commonly assumed and widely used in local Gypsy and Traveller assessments, even though there is no statistical evidence of households growing so quickly. The result has been to inflate both national and local requirements for pitches unrealistically. In this context, ORS prepared a Technical Note on Gypsy and Traveller Household Formation and Growth Rates in 2015 and updated it in June 2020. The main conclusions are set out here and the full paper is in **Appendix G: Technical Note on Household Formation and Growth Rates**.
- 6.5 Those seeking to provide evidence of high annual net household growth rates for Gypsies and Travellers have sometimes sought to rely on increases in the number of caravans, as reflected in caravan counts. However, caravan count data is unreliable and erratic – so the only proper way to project future population and household growth is through demographic analysis.
- 6.6 The Technical Note concludes that in fact, the growth in the national Gypsy and Traveller population may be as low as 1.25% per annum – much less than the 3.00% per annum often assumed, but still greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find evidence that net Gypsy and Traveller population and household growth rates are above 2.00% per annum nationally.
- 6.7 The often assumed 3.00% per annum net household growth rate is unrealistic and would require clear statistical evidence before being used for planning purposes. In practice, the best available evidence supports a national net household growth rate of 1.50% per annum for Gypsies and Travellers (in addition

¹¹ See Paragraphs 3.41 and 3.42 for details of components on current and future need.

¹² Page 25, *Gypsy and Traveller Accommodation Needs Assessments – Guidance* (DCLG – 2007) Now withdrawn.

research by ORS has identified a national growth rate of 1.00% for Travelling Showpeople) and this has also been adjusted locally based on site demographics.

- 6.8 This view has been supported by Planning Inspectors in a number of Decision Notices. The Inspector for an appeal in Doncaster that was issued in November 2016 (**Ref: APP/F4410/W/15/3133490**) where the agent acting on behalf of the appellant claimed that a rate closer to 3.00% should be used concluded:

In assessing need account also needs to be taken of likely household growth over the coming years. In determining an annual household growth rate, the Council relies on the work of Opinions Research Services (ORS), part of Swansea University. ORS's research considers migration, population profiles, births & fertility rates, death rates, household size data and household dissolution rates to determine average household growth rates for gypsies and travellers. The findings indicate that the average annual growth rate is in the order of 1.50% but that a 2.50% figure could be used if local data suggest a relatively youthful population. As the Council has found a strong correlation between Doncaster's gypsy and traveller population age profile and the national picture, a 1.50% annual household growth rate has been used in its 2016 GTANA. Given the rigour of ORS's research and the Council's application of its findings to the local area I accept that a 1.50% figure is justified in the case of Doncaster.

- 6.9 Another more recent case was in relation to an appeal in Guildford that was issued in March 2018 (**Ref: APP/W/16/3165526**) where the agent acting on behalf of the appellant again claimed that a rate closer to 3.00% should be used. The Inspector concluded:

There is significant debate about household formation rates and the need to meet future growth in the district. The obvious point to make is that this issue is likely to be debated at the local-plan examination. In my opinion, projecting growth rates is not an exact science and the debate demonstrates some divergence of opinion between the experts. Different methodologies could be applied producing a wide range of data. However, on the available evidence it seems to me that the figures used in the GTAA are probably appropriate given that they are derived by using local demographic evidence. In my opinion, the use of a national growth rate and its adaptation to suit local or regional variation, or the use of local base data to refine the figure, is a reasonable approach.

- 6.10 ORS assessments take full account of the net local household growth rate per annum calculated on the basis of demographic evidence from the site surveys, and the 'baseline' includes all current authorised households, all households identified as in current need (including concealed households, movement from bricks and mortar and those on waiting lists not currently living on a pitch or plot), as well as households living on tolerated unauthorised pitches or plots who are not included as current need. The assessments of future need also take account of modelling projections based on birth and death rates, household dissolution, and in-/out-migration.
- 6.11 Overall, the household growth rate used for the assessment of future needs is informed by local evidence. This local demographic evidence is usually used to adjust the ORS national growth rate of 1.50% up or down based on the proportion of those aged under 18 (by planning status).

- 6.12 However, in certain circumstances where the numbers of households and children are low, or the population age structure cohorts are skewed by certain age groups, it is not appropriate to apply a percentage rate for new household formation. In these cases, a judgement is made on likely new household formation based on the age and gender of the children. This is based on the assumption that 50% of households likely to form will stay in the area. This is based on evidence from other GTAA's that ORS have completed across England and Wales.
- 6.13 The latter approach has been applied in Great Yarmouth and the Broads Authority for the following reasons:
- » Great Yarmouth borough (excluding the Broads Authority) Gypsies and Travellers that meet the planning definition – no children aged under 18.
 - » Great Yarmouth borough (excluding the Broads Authority) households that do not meet the planning definition – low numbers of children aged under 3.
 - » Broads Authority part of Great Yarmouth borough Gypsies and Travellers that meet the planning definition – skewed population cohorts with low numbers aged 8-12 and 0-2.
 - » Broads Authority part of Great Yarmouth borough Gypsies and Travellers that do meet the planning definition – no children aged under 18.
- 6.14 New household formation has been calculated from year 6 of the GTAA period onwards. New household formation for years 0-5 of the GTAA period is from teenagers in need of a pitch in the next 5 years who have been identified as components of need in the household interviews. This eliminates any double counting in the assessment of need.

Breakdown by 5 Year Bands

- 6.15 In addition to tables which set out the overall need for Gypsies and Travellers, the overall need has also been broken down by 5-year bands as required by PPTS. The way that this is calculated is by including all current need (from unauthorised pitches, pitches with temporary planning permission, concealed and doubled-up households, 5 year need from teenage children, and net movement from bricks and mortar) in the first 5 years. In addition, the total net new household formation is split across the GTAA period based on the compound rate of growth that was applied rather than being split equally over time.

Applying the PPTS Planning Definition

- 6.16 The outcomes from the household interviews were used to determine the status of each household against the planning definition in PPTS (2023). This assessment was based on the responses to the questions given to Researchers. Only those households that met the planning definition or those who demonstrated that they have ceased to travel temporarily or permanently (due to education, ill health, or old age) form the components of need in the GTAA that will need to be addressed through a Gypsy and Traveller Local Plan Policy.
- 6.17 In addition, households where an interview was not completed who may meet the planning definition have also been included as a potential additional component of need from undetermined households. Whilst they do not need to be formally considered in the GTAA, need from households that did not meet the planning

definition has also been assessed to provide the Local Planning Authorities with information on levels of need that will have to be considered as part of the wider housing needs of the area and through separate Local Plan Policies.

^{6.18} The information used to assess households against the planning definition included information on whether households have ever travelled; why they have stopped travelling; the reasons that they travel; and whether they plan to travel again in the future and for what reasons. The tables below set out the planning status of households that were interviewed for the Great Yarmouth GTAA. This includes any hidden households that were identified during the household interviews including concealed and doubled-up households or single adults and accepted in-migration.

Figure 9 – Planning status of households in Great Yarmouth borough (excluding the Broads Authority)

Status	Meet Planning Definition	Do Not Meet Planning Definition	Undetermined
Gypsies and Travellers			
Public Sites	6	12	0
Private Sites	0	0	0
Temporary Sites	0	0	0
Tolerated Sites	0	0	0
Unauthorised Sites	0	0	0
TOTAL	6	12	0

Figure 10 - Planning status of households in the Broads Authority part of Great Yarmouth borough

Status	Meet Planning Definition	Do Not Meet Planning Definition	Undetermined
Gypsies and Travellers			
Public Sites	0	0	0
Private Sites	0	0	0
Temporary Sites	0	0	0
Tolerated Sites	0	0	0
Unauthorised Sites	15	2	0
TOTAL	15	2	0

^{6.19} Figure 99 shows that for Gypsies and Travellers in Great Yarmouth borough, 6 households met the planning definition of a Traveller in that they were able to demonstrate that household members travel for work purposes, or for seeking work, and stay away from their usual place of residence or have ceased to travel temporarily or permanently.

^{6.20} A total of 12 Gypsy and Traveller households did not meet the planning definition as they were not able to demonstrate that they travel have travelled for work in the past or have ever travelled.

- 6.21 Figure 1010 shows that for Gypsies and Travellers in the Broads Authority part of Great Yarmouth borough 15 households met the planning definition of a Traveller in that they were able to demonstrate that household members travel for work purposes, or for seeking work, and stay away from their usual place of residence or have ceased to travel temporarily or permanently.
- 6.22 A total of 2 Gypsy and Traveller households did not meet the planning definition.

Interviews with Gypsies and Travellers in Bricks and Mortar

- 6.23 Following all of the efforts that were made it was not possible to interview any households living in bricks and mortar.

Migration/Roadside

- 6.24 The study also sought to identify any need from households who have been forced to move from sites due to overcrowding and who are currently living on the roadside or on sites in other local authorities – and who have strong family links with households in Great Yarmouth borough. These are referred to as roadside households or displaced in-migration.
- 6.25 Evidence drawn from the household interviews has been considered alongside assessments of need that have been completed in other nearby local authorities. The household interviews did not identify any households living predominantly on the roadside in Great Yarmouth borough or outside of Great Yarmouth borough with a need to move to a permanent pitch in the area.
- 6.26 Therefore, net migration to the sum of zero has been assumed for the GTAA – which means that net pitch requirements are driven by locally identifiable need rather than speculative modelling assumptions.
- 6.27 It is important to note that any applications for new sites or additional pitches as a result of in-migration should be seen as windfall need and should be dealt with by Criteria-Based Local Plan Policies.

Waiting List for Public Sites

- 6.28 The Council have confirmed that there are no households on a waiting list for the public site at Gapton Hall.

Gypsy and Traveller Needs

Pitch Needs – Gypsies and Travellers that met the Planning Definition – Great Yarmouth Borough (excluding the Broads Authority)

^{6.29} Analysis of the household interviews indicated that there is a need for 3 pitches from households or single adults that are concealed or doubled-up; and for none from new household formation. This is netted off by 3 of the vacant pitches on the public site. Therefore, the overall level of need for those households who met the planning definition of a Gypsy or Traveller in Great Yarmouth borough is **for no pitches over the GTAA period.**

Figure 11 – Need for Gypsy and Traveller households in Great Yarmouth borough (excluding the Broads Authority) that met the Planning Definition

Gypsy & Traveller – Meeting Planning Definition	Pitches
Supply of Pitches	
Available supply from vacant public and private pitches	3
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	3
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-Up/Over-Crowding	3
5 year need from teenage children	0
Movement from bricks and mortar	0
In-Migration/Roadside	0
Households on waiting lists for public sites	0
Total Current Need	3
Future Need	
Households on pitches with temporary planning permission	0
New household formation	0
<i>(No children aged under 18)</i>	
Total Future Need	0
Net Pitch Need = (Current and Future Need – Total Supply)	0

Figure 12 – Need for Gypsy and Traveller households in Great Yarmouth borough (excluding the Broads Authority) that met the Planning Definition by year periods

Year Period	Dates	Need
0 – 5	2024 – 28	0
6 – 10	2029 – 33	0
11 – 15	2034 – 38	0
16 – 28	2039 – 41	0
0 – 18	2023 – 41	0

Pitch Needs – Undetermined Gypsies and Travellers – Great Yarmouth Borough (excluding the Broads Authority)

^{6.30} There were no undetermined households so there is no current or future need for pitches.

^{6.31} See **Appendix C**: Undetermined households for further details.

Pitch Needs – Gypsies and Travellers that do not meet the Planning Definition – Great Yarmouth Borough (excluding the Broads Authority)

^{6.32} It is not now a requirement for a GTAA to include an assessment of need for households that do not meet the planning definition. However, this assessment is included for illustrative purposes, to help fulfil the requirements of the Housing Act (1985) and the NPPF (2023) and to provide the Council with information on levels of need that will have to be addressed through separate Local Plan Policies.

^{6.33} On this basis, it is evident that whilst any needs from the households who did not meet the planning definition will represent only a very small proportion of the overall housing need, the Council will still need to ensure that arrangements are in place to properly address these needs – especially as many identified as Irish and Romany Gypsies and may claim that the Council should meet their housing needs through culturally appropriate housing.

^{6.34} The assessment identified **a need for 8 pitches for households that do not meet the planning definition** in Great Yarmouth borough. This is made up of 1 concealed/doubled-up household or single adult; 4 from a 5-year need from teenagers; and 6 from new household formation, derived from the household demographics. Current need is netted of by 3 of the vacant pitches on the public site.

^{6.35} See **Appendix D**: Households that did not meet the Planning Definition for further details.

Pitch Needs – Gypsies and Travellers that meet the Planning Definition – Broads Authority part of Great Yarmouth borough

^{6.36} Analysis of the household interview information in the Broads Authority part of Great Yarmouth borough indicated that there is a need for 11 pitches for households on unauthorised developments; 4 concealed/doubled-up households or single adults; 5 from a 5-year need from teenagers; and for 4 from new household formation, derived from the household demographics. Therefore, the overall level of need for those households who met the planning definition of a Gypsy or Traveller **is for 24 pitches over the GTAA period.**

^{6.37} It should be noted that it is understood that several of the unauthorised pitches may have been occupied for over 10 years. The Broads Authority will need to complete additional investigations to determine which of these pitches could be classed as tolerated for planning purposes and this may reduce the levels of identified need.

Figure 13 - Need for Gypsy and Traveller households in the Broads Authority part of Great Yarmouth borough

Gypsy & Traveller – Meeting Planning Definition	Pitches
Supply of Pitches	
Available supply from vacant public and private pitches	0
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	11
Households on unauthorised encampments	0
Concealed households/Doubling-Up/Over-Crowding	4
5 year need from teenage children	5
Movement from bricks and mortar	0
In-Migration/Roadside	0
Households on waiting lists for public sites	0
Total Current Need	20
Future Need	
Households on pitches with temporary planning permission	0
New household formation	4
<i>(Formation from demographics)</i>	
Total Future Need	4
Net Pitch Need = (Current and Future Need – Total Supply)	24

Figure 14 – Need for Gypsy and Traveller households the Broads Authority part of Great Yarmouth borough that met the Planning Definition by year periods

Year Period	Dates	Need
0 – 5	2024-28	20
6 – 10	2029-33	1
11 – 15	2034-38	2
16 – 18	2039-41	1
0 – 18	2023-41	24

Pitch Needs – Undetermined Gypsies and Travellers – Broads Authority Part of Great Yarmouth Borough

^{6.38} There were no undetermined households so there is no current or future need for pitches.

^{6.39} See **Appendix C**: Undetermined households for further details.

Pitch Needs – Gypsies and Travellers that do not meet the Planning Definition – Broads Authority Part of Great Yarmouth Borough

^{6.40} It is not now a requirement for a GTAA to include an assessment of need for households that did not meet the planning definition. However, this assessment is included for illustrative purposes, to help fulfil the requirements of the Housing Act (1985) and the NPPF (2023) and to provide the Broads Authority with information on levels of need that will have to be addressed through separate Local Plan Policies.

^{6.41} On this basis, it is evident that whilst any needs from the households who did not meet the planning definition will represent only a very small proportion of the overall housing need, the Broads Authority will still need to ensure that arrangements are in place to properly address these needs – Criteria-Based Local Plan Policies for example.

^{6.42} There is a need for **2 pitches for households that did not meet the planning definition** from 2 unauthorised pitches.

^{6.43} Again it should be noted that it is understood that some of the unauthorised pitches may have been occupied for over 10 years and therefore may be immune from any enforcement action. The Broads Authority will need to complete additional investigations to determine which of these pitches could be classed as tolerated for planning purposes and this may reduce the levels of identified need.

^{6.44} See **Appendix D**: Households that did not meet the Planning Definition for further details.

Travelling Showpeople Needs

6.45 There were no Travelling Showpeople identified living on yards In Great Yarmouth borough so there is no current or future need for plots.

Transit Requirements

6.46 When determining the potential need for transit provision the assessment has looked at data from the MHCLG Traveller Caravan Count; the outcomes of the discussions with Council and Broads Authority Officers; and records on numbers of encampments.

MHCLG Traveller Caravan Count

6.47 Data from the Traveller Caravan Count shows that there have been no unauthorised caravans recorded in the study area on the Caravan Count days in January and July in recent years.

Officer Engagement and Local Data

6.48 There are 6 public transit pitches on the Gapton Hall site in Great Yarmouth. The discussions with Council Officers determined that these are very rarely used and that 3 are currently occupied on a permanent basis as a result of this.

6.49 Information held by the Local Planning Authorities has indicated that whilst there have been no unauthorised caravans recorded in the Caravan Count in recent years, there were 75 recorded encampments between May 2018 and July 2023 (approximately 12 each year) and that these were all short-term and transient in nature and mainly during the summer months.

6.50 This data includes encampments on Great Yarmouth Council land and also some on privately owned land. It is important to note that where private land is concerned, Great Yarmouth Council may not hold all of the relevant data as they only record what is known to them or what they are notified of.

Transit Recommendations

6.51 Given that there are low numbers of encampments each year and under-utilised public transit pitches it is not recommended that there is a need for another formal public transit site in Great Yarmouth borough at this time. However, the situation relating to levels of encampments should be monitored to determine if there are any increases in the number of encampments.

6.52 As well as information on the size and duration of the encampments, this monitoring should also seek to gather information from residents on the reasons for their stay in the local area; whether they have a permanent base or where they have travelled from; and whether they have any need or preference to settle

permanently in the local area. This information could be collected as part of a Welfare Assessment (or similar).

- 6.53 It is recommended that a review of the evidence base relating to encampments, including the monitoring referred to above, should be undertaken on a Norfolk-wide basis. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether a managed approach is preferable.
- 6.54 In the short-term the Local Planning Authorities should continue to use their current approaches when dealing with encampments, and management-based approaches such as negotiated stopping agreements could also be considered.
- 6.55 The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the Local Planning Authority and the (temporary) residents regarding expectations on both sides. See www.negotiatedstopping.co.uk for further information.
- 6.56 Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.

7. CONCLUSIONS

^{7.1} This study provides a robust evidence base to enable the Local Planning Authorities to assess the housing needs of the Travelling Community as well as complying with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Policy for Traveller Sites 2023, the Housing and Planning Act 2016, the National Planning Policy Framework 2023, and Planning Practice Guidance 2021. It also provides the evidence base which can be used to support Local Plan Policies.

Gypsies and Travellers – Great Yarmouth Borough (excluding the Broads Authority)

- ^{7.2} In summary, in Great Yarmouth borough, for the GTAA period 2024 to 2041, there is a need for:
- » No pitches for Gypsy and Traveller households for Gypsy and Traveller households that met the 2023 PPTS planning definition.
 - » No pitches for undetermined Gypsy and Traveller households that may meet the planning definition.
 - » 8 pitches for Gypsy and Traveller households who did not meet the planning definition.

Gypsies and Travellers – Broads Authority Part of Great Yarmouth Borough

- ^{7.3} In summary, in the Broads Authority part of Great Yarmouth borough, for the GTAA period 2024 to 2041, there is a need for:
- » 24 pitches for Gypsy and Traveller households that met the 2023 PPTS planning definition.
 - » No pitches for undetermined Gypsy and Traveller households that may meet the planning definition.
 - » 2 pitches for Gypsy and Traveller households who did not meet the planning definition.
- ^{7.4} In general terms need identified in a GTAA is seen as need for pitches. As set out in Chapter 4 of this report, the now withdrawn *Government Guidance on Designing Gypsy and Traveller Sites* recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, parking space for two vehicles and a small garden area.
- ^{7.5} The Local Planning Authorities will also need to carefully consider how to address any needs from households seeking to move to Great Yarmouth borough and the Broads Authority (in-migration), or from households currently living in bricks and mortar who may wish to move to a site. In terms of the Local Plan Policies, the Local Planning Authorities should continue to use adopted Local Plan Policies (when in place) which are a criteria-based policy (as suggested in PPTS) for any undetermined households, as well as to deal with any windfall applications, need from in-migration, and need from bricks and mortar.

- ^{7.6} Regarding need from households that did not meet the planning definition, in general terms, it is the Government's intention that any need for households that do not fall within the 2023 PPTS planning definition should be met as a part of general housing need, through separate Local Plan Policies. This is reflected in Paragraph 63 of the NPPF (2023)
- ^{7.7} Future need from new household formation could also be met through natural turnover of pitches over time.
- ^{7.8} Whilst the findings in this report are aggregated totals for Great Yarmouth borough and the Broads Authority due to data protection issues, the Local Planning Authorities have more detailed data to enable an accurate review of Local Plan allocations to be made.

Transit Provision

- ^{7.9} Given that there are low numbers of encampments each year and under-utilised public transit pitches it is not recommended that there is a need for another formal public transit site in Great Yarmouth borough at this time. However, the situation relating to levels of encampments should be monitored to determine if there are any increases in the number of encampments.
- ^{7.10} It is recommended that a review of the evidence base relating to encampments, including the monitoring referred to above, should be undertaken on a Norfolk-wide basis. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether a managed approach is preferable.
- ^{7.11} In the short-term the Local Planning Authorities should continue to use its current approaches when dealing with encampments, and management-based approaches such as negotiated stopping agreements could also be considered.

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Appendix B: Glossary of Terms / Acronyms Used

Glossary

Amenity block meaning a building where basic plumbing amenities are provided. This could include a bath, a shower, a WC and a sink.

Bricks and mortar is used to describe mainstream housing.

Caravan is used to describe mobile living vehicle used by Gypsies and Travellers. Also referred to as trailers.

Concealed household is used to describe households living within other households, who are unable to set up separate family units.

Doubling-Up refers to there being more than the permitted number of caravans on a pitch or plot.

Emergency Stopping Place is a temporary site with limited facilities to be occupied by Gypsies and Travellers while they travel.

Green Belt refers to a land use designation used to check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns.

Household Formation is the process in which individuals form separate households. This is normally though adult children setting up their own household.

In-migration refers to movement of households into a region or community.

Local Plans are Local Authority spatial planning documents that can include specific policies and/or site allocations for Gypsies, Travellers and Travelling Showpeople.

Out-migration refers to the Movement from one region or community in order to settle in another.

Pitch/plot is an area of land on a site or development generally home to one household. Can be varying sizes and have varying caravan numbers. Pitches refer to Gypsy and Traveller sites and Plots to Travelling Showpeople yards.

Private site is an authorised site owned privately. This can be owner-occupied, rented or a mixture of owner-occupied and rented pitches.

Site refers to an area of land on which Gypsies, Travellers and Travelling Showpeople are accommodated in caravans, chalets, or vehicles. Can contain one or multiple pitches or plots.

Social/Public/Council Site is an authorised site owned by either the local authority or a Registered Housing Provider.

Temporary planning permission refers to a private site with planning permission for a fixed period of time.

Tolerated site/yard refers to long-term tolerated sites or yards where enforcement action is not expedient, and a certificate of lawful use would be granted if sought.

Transit provision refers to a site intended for short stays and containing a range of facilities. There is normally a limit on the length of time residents can stay.

Unauthorised Development refers to caravans on land owned by Gypsies and Travellers and without planning permission.

Unauthorised Encampment refers to caravans on land not owned by Gypsies and Travellers and without planning permission.

Waiting list is a record held by the local authority or site managers of applications to live on a site.

Yard is a name often used by Travelling Showpeople to refer to a site.

Acronyms and Initials

GTAA	Gypsy and Traveller Accommodation Assessment
LPA	Local Planning Authority
MHCLG	Ministry for Housing, Communities and Local Government
NPPF	National Planning Policy Framework
ORS	Opinion Research Services
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites

Appendix C: Undetermined households

Figure 15 – Need for undetermined Gypsy and Traveller households in Great Yarmouth borough (excluding the Broads Authority)

Gypsy & Traveller – Undetermined	Pitches
Supply of Pitches	
Available supply from vacant public and private pitches	0
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-Up/Over-Crowding (modelled)	0
5 year need from teenage children (modelled)	6
Movement from bricks and mortar	0
In-Migration/Roadside	0
Households on waiting lists for public sites	0
Total Current Need	0
Future Need	
Households on pitches with temporary planning permission	0
New household formation	0
<i>(No undetermined households)</i>	
Total Future Need	0
Net Pitch Need = (Current and Future Need – Total Supply)	0

Figure 16 – Need for undetermined Gypsy and Traveller households in Great Yarmouth borough (excluding the Broads Authority) by year periods

Year Period	Dates	Need
0 – 5	2024 – 28	0
6 – 10	2029 – 33	0
11 – 15	2034 – 38	0
16 – 18	2039 – 41	0
0 – 18	2023 – 41	0

Figure 17 - Need for undetermined Gypsy and Traveller households in the Broads Authority part of Great Yarmouth borough

Gypsy & Traveller – Undetermined	Pitches
Supply of Pitches	
Available supply from vacant public and private pitches	0
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-Up/Over-Crowding	0
5 year need from teenage children	0
Movement from bricks and mortar	0
In-Migration/Roadside	0
Households on waiting lists for public sites	0
Total Current Need	0
Future Need	
Households on pitches with temporary planning permission	0
New household formation	0
<i>(No undetermined households)</i>	
Total Future Need	0
Net Pitch Need = (Current and Future Need – Total Supply)	0

Figure 18 – Need for undetermined Gypsy and Traveller households in the Broads Authority part of Great Yarmouth borough by year periods

Year Period	Dates	Need
0 – 5	2024 – 28	0
6 – 10	2029 – 33	0
11 – 15	2034 – 38	0
16 – 18	2039 – 41	0
0 – 18	2023 – 41	0

Appendix D: Households that did not meet the Planning Definition

Figure 19 – Need for Gypsy and Traveller households in Great Yarmouth borough (excluding the Broads Authority) that did not meet the Planning Definition

Gypsy & Traveller – Not Meeting Planning Definition	Pitches
Supply of Pitches	
Available supply from vacant public and private pitches	3
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	3
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-Up/Over-Crowding	1
5 year need from teenage children	4
Movement from bricks and mortar	0
In-Migration/Roadside	0
Households on waiting lists for public sites	0
Total Current Need	5
Future Need	
Households on pitches with temporary planning permission	0
New household formation	6
<i>(Formation from demographics)</i>	
Total Future Need	6
Net Pitch Need = (Current and Future Need – Total Supply)	8

Figure 20 – Need for Gypsy and Traveller households in Great Yarmouth borough (excluding the Broads Authority) that did not meet the Planning Definition by year periods

Year Period	Dates	Need
0 – 5	2024 – 28	2
6 – 10	2029 – 33	2
11 – 15	2034 – 38	3
16 – 18	2039 – 41	1
0 – 18	2023 – 41	8

Figure 21 – Need for Gypsy and Traveller households in the Broads Authority part of Great Yarmouth borough that did not meet the Planning Definition

Gypsy & Traveller – Not Meeting Planning Definition	Pitches
Supply of Pitches	
Available supply from vacant public and private pitches	0
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	2
Households on unauthorised encampments	0
Concealed households/Doubling-Up/Over-Crowding	0
5 year need from teenage children	0
Movement from bricks and mortar	0
In-Migration/Roadside	0
Households on waiting lists for public sites	0
Total Current Need	2
Future Need	
Households on pitches with temporary planning permission	0
New household formation	0
<i>(No formation from 2 households)</i>	
Total Future Need	0
Net Pitch Need = (Current and Future Need – Total Supply)	2

Figure 22 – Need for Gypsy and Traveller households in the Broads Authority part of Great Yarmouth borough that did not meet the Planning Definition by year periods

Year Period	Dates	Need
0 – 5	2024 – 28	2
6 – 10	2029 – 33	0
11 – 15	2034 – 38	0
16 – 18	2039 – 41	0
0 – 18	2023 – 41	2

Appendix E: Site and Yard list

Great Yarmouth Borough (excluding the Broads Authority)

Site/Yard	Tenure	Authorised	Unauthorised
Gapton Hall	Public	18	-
Gapton Hall	Public Transit ¹³	6	-
Total Pitches		24	0


Broads Authority Part of Great Yarmouth Borough

Site/Yard	Tenure	Authorised	Unauthorised
Blackgate Farm	Unauthorised	-	1
Blackgate Stables	Unauthorised	-	1
Corner Plot	Unauthorised	-	1
Hunters Lodge/Maple Lodge	Unauthorised	-	2
Land north of The Lodge	Unauthorised	-	1
New Cut Farm (rear of retail park)	Unauthorised	-	3
Sequoia Lodge	Unauthorised	-	1
Sheltanlee Stud	Unauthorised	-	2
The Lodge	Unauthorised	-	1
Total Pitches		0	13

¹³ 3 pitches are permitted for permanent occupation.

Appendix F: Questionnaire

Interview or Proxy?



Project Code

GTAA Questionnaire

Introduction

Good morning / afternoon My name is [INTERVIEWER] from Opinion Research Services, working on behalf of [CLIENT]

The Council are undertaking a study of Gypsy, Traveller and Travelling Showmen accommodation needs assessment in this area. This is needed to make sure that accommodation needs are properly assessed and to get a better understanding of the needs of the Travelling Community.

The Council need to try and speak with every Gypsy, Traveller and Travelling Showmen household in the area to make sure that the assessment of need is accurate.

Your household will not be identified and all the information collected will be anonymous and will only be used to help understand the needs of Gypsy, Traveller and Travelling Showmen households.

All questions are optional and all information you provide will be processed by ORS in accordance with the Data Protection Act and GDPR. Your responses will be stored and processed electronically and securely. This paper form will be securely destroyed after processing. Your household will not be identified to the council and only anonymous data and results will be submitted, though verbatim comments may be reported in full, and the data from this survey will only be used to help understand the needs of Gypsy, Traveller and Travelling Showmen households

A: General Information

Q1. Name of planning authority

Please write in

Q1b Sub area (if needed)

Q2. Address & pitch number

Please write in

Q3. Date of visit

Please write in – DD/MM/YY

Q4. Time of visit


Please write in – HH:MM

Q5. Status of Private Site?

----- Private rented

----- Private owned

----- N/A



<p>Q6. Name of respondent Please write in</p> <div style="border: 1px solid black; height: 60px; width: 100%;"></div>	<p>Q10. Where is your main residence? Please write in</p> <div style="border: 1px solid black; height: 110px; width: 100%;"></div>
<p>Q7. Which of these best describes you? READ OUT: Please tick ONE box only</p> <p>Romany Gypsy <input type="checkbox"/></p> <p>Irish Traveller <input type="checkbox"/></p> <p>Scots Gypsy or Traveller <input type="checkbox"/></p> <p>Travelling Showmen <input type="checkbox"/></p> <p>New Traveller <input type="checkbox"/></p> <p>English Traveller <input type="checkbox"/></p> <p>Welsh Gypsy <input type="checkbox"/></p> <p>Non Traveller <input type="checkbox"/></p> <p>Other <input type="checkbox"/></p> <p>Please write in</p> <div style="border: 1px solid black; height: 30px; width: 100%;"></div>	<p>Q11. How long have you lived here? Years and months</p> <div style="border: 1px solid black; height: 30px; width: 100%;"></div> <p>IF MOVED IN PAST FIVE YEARS ASK</p> <p>Q12. Where did you move from? Please write in</p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>
<p>Q8. How many units are on the pitch? Please write a number in each box</p> <p>Mobile homes / Static caravans <input type="text"/></p> <p>Touring caravans <input type="text"/></p> <p>Day Rooms / Utility Shed <input type="text"/></p> <p>Bungalows / Bricks and Mortar <input type="text"/></p> <p>Other (e.g. Park Home or American Caravan) <input type="text"/></p>	<p>Q13. Do you live here out of choice or because there is no other option?</p> <p>Choice <input type="checkbox"/> SKIP TO Q15</p> <p>No other option <input type="checkbox"/> ANSWER Q14</p> <p>Q14. Why do you feel there is no other choice? Please write in</p> <div style="border: 1px solid black; height: 200px; width: 100%;"></div>
<p>Q9. Is this site your main place of residence?</p> <p>Yes <input type="checkbox"/> SKIP TO Q11</p> <p>No <input type="checkbox"/> ANSWER Q10</p>	<p>Q15. Is this site suitable for your household?</p> <p>Yes <input type="checkbox"/> SKIP TO Q17</p> <p>No <input type="checkbox"/> ANSWER Q16</p>

@2023 Opinion Research Services 2

Q16. Why do you feel this site isn't suitable?

PROBE: SCHOOLS, WORK, HEALTHCARE, FAMILY AND FRIENDS

Please write in

Q17. How many separate families or single adults live on this pitch?

Please write a number in the box

B: HOUSEHOLD DEMOGRAPHICS

Q18. Please tell me about the members of your household

Please complete below for the main household on this pitch. Any further families pertinent to this pitch should be included in section G using the format below.

For example, a seven year old daughter should be entered as

F	07
Daughter	

Person 1	Person 2								
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">GENDER</td> <td style="text-align: center;">AGE</td> </tr> <tr> <td colspan="2" style="text-align: center;">Interviewee</td> </tr> </table>	GENDER	AGE	Interviewee		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">GENDER</td> <td style="text-align: center;">AGE</td> </tr> <tr> <td colspan="2" style="height: 20px;"></td> </tr> </table>	GENDER	AGE		
GENDER	AGE								
Interviewee									
GENDER	AGE								
Person 3	Person 4								
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">GENDER</td> <td style="text-align: center;">AGE</td> </tr> <tr> <td colspan="2" style="height: 20px;"></td> </tr> </table>	GENDER	AGE			<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">GENDER</td> <td style="text-align: center;">AGE</td> </tr> <tr> <td colspan="2" style="height: 20px;"></td> </tr> </table>	GENDER	AGE		
GENDER	AGE								
GENDER	AGE								
Person 5	Person 6								
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GENDER	AGE								
GENDER	AGE								
Person 7	Person 8								
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GENDER	AGE								
GENDER	AGE								

Person 9

GENDER	AGE

Person 10

GENDER	AGE

How many additional families or single adults are included in Section G?

Please write a number

C: ACCOMMODATION NEEDS

Q19. How many families or single adults living on this pitch will need a pitch of their own in the next five years?

An adult is defined as 18+
Please write a number

Q20. How many of your children will need a home of their own in the next 5 years?

Please write a number

IF ZERO SKIP TO Q24

Q21. Do the individuals counted above currently live on this site?

Yes GO TO Q22

No SKIP TO Q23

Q22. Would they wish to stay here and, if not, where would they wish to move to?

Please write in

Q23. Where do they currently live? And would they wish to move to this site or another local site if possible?

Please write in

D: FUTURE ACCOMMODATION NEEDS

Q24. Do you plan to move from this site in the next five years?

Yes **GO TO Q32**

No **SKIP TO Q36**

Q25. Why do you plan to move?

Please write in

Q26. Where do you plan to move to?

Another site in this area

A site in another council area

Bricks & mortar in this area

Bricks & mortar in another council area

Other (e.g. land they own elsewhere)

Please provide more detail on the answer above

Q27. Would you prefer to buy a site or rent on a public or private site?

Private buy

Private rent

Public rent

Q28. Can you afford to buy a private pitch or site?

Yes

No

Don't know

Q29. Are you aware of, or do you own any land that has potential for new pitches

Yes **GO TO Q37**

No **SKIP TO Q38**

Q30. Where is the site and who owns it?

Please write in

E: Travelling

Q31. How many trips, living in a caravan or a trailer, have you or members of your family made away from your permanent base in the last 12 months?

0 **SKIP TO Q44**

1

2

3 **GO TO Q39**

4

5+

Q32. Which family members travelled?

All the family

Adult males

Other

Please write in

Q33. What were the reasons for travelling?

- Work

- Holidays

- Visiting family

- Fairs

- Other

If work, please write I profession or trade; and if fairs, holidays or visiting family, probe whether this involves any elements of work.

Q34. At what time of year do you or family members usually travel?

- All year

- Summer

- Winter

Q35. How long do you usually travel for?

Please write in

Q36. Where do you or family members usually stay when they are travelling?

- LA transit sites

- Private transit sites

- Roadside

- Friends / Family

- Other

Please write in

IF BEEN TRAVELLING - GO TO Q49
NON-TRAVELLING ANSWER Q44 - Q48

Q37. Are there any reasons you don't travel at the moment?

Please write in

Q38. Have you or family members ever travelled

- Yes **GO TO Q46**

- No **SKIP TO Q49**

Q39. When did you or family members last travel?

Please write in

Q40. What were the reasons for travelling?

- Work

- Holidays

- Visiting family

- Fairs

- Other

Please write in or list profession if for work. If for work, please write profession or trade; and if fairs, holidays or visiting family, probe whether this involves any elements of work.

Q41. Why do you not travel anymore?

- Children in school

- Ill health

- Old age

- Settled now

- Nowhere to stop

- No work opportunities

- Other

Please write in

Q42. Do you or other family members plan to travel in the future

- Yes **ANSWER Q50**

- No **SKIP TO Q51**

- Don't know **SKIP TO Q51**

Q43. When and why do you / they plan to travel?

Please write in

Q44. Is there anything else you'd like to tell us about your travelling patterns?

Please write in

F: Contact information

Q45. Is there anything else you'd like to tell us about this site and your accommodation needs?

Please write in

Q46. Would you like ORS to contact you again regarding future needs assessments?

- Yes **GO TO Q54**

- No **SKIP TO Q56**

47. Would you like the Council to contact you about your accommodation needs?

- Yes **GO TO Q55**

- No **SKIP TO Q56**

Q48. Can I confirm the details they should use to contact you?

We cannot guarantee if and when they will make contact with you.

Name

Phone number

Email address

Q48a. Do you know of anyone living in Bricks and Mortar who we should contact for this study?

- Yes

- No

Q48b. Can you provide their contact details?

Name

Phone number

Email address

If can't provide details will you ask them to contact us on 0800 0789786

G: Any notes / Extra information

Interviewer: please use this space for any additional information including details about additional households

[Empty space for interviewer notes]

Interviewer Declaration: I confirm that this interview was conducted in accordance with all interviewing guidelines and that the data collected is accurately recorded

Interviewer Name:	
Interviewer Signature:	
Date:	

Appendix G: Technical Note on Household Formation and Growth Rates



Report for the Broads Authority

Local Plan Viability Assessment

Report – October 2024

Document control sheet	
Project name	Broads Authority Local Plan
Project reference	Viability Assessment
Report title	Broads Authority Local Plan Viability Assessment
Doc ref	Final report
Date	October 2024
Prepared by	Laura Easton, Tom Marshall
Reviewed by	Lin Cousins
Quality statement	In preparing this report, the authors have followed national and professional standards, acted with objectivity, impartially, without interference and with reference to appropriate available sources of information. No performance-related or contingent fees have been agreed and there is no known conflict of interest in advising the client group.
Use of this report	<p>This report is not a formal land valuation or scheme appraisal. It has been prepared using the Three Dragons toolkit and is based on local level data supplied by the Broads Authority, consultant team inputs and quoted published data sources. The toolkit provides a review of the development economics of illustrative schemes and the results depend on the data inputs provided. This analysis should not be used for individual scheme appraisal.</p> <p>No responsibility whatsoever is accepted to any third party who may seek to rely on the content of the report unless previously agreed.</p>
Cover photo	Reedham riverside (Three Dragons)

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EXECUTIVE SUMMARY

Context

1. The Broads Authority (BA) is reviewing its Local Plan. The new Local Plan will set out the opportunities for development across the Broads Authority Executive Area for the period up to 2041, alongside the policies to support that development, as well as policies to conserve and enhance the natural environment. As part of the review process, the BA needs evidence to demonstrate the deliverability of potential future policies, including what balance of affordable and market housing is viable and whether this varies across the area.
2. The Viability Assessment has been prepared in consultation with the development industry and other key stakeholders and has followed the relevant regulations and government guidance. As is standard practice, it has adopted a residual value approach for analysis. Residual value is the value of the completed development (known as the gross development value or GDV) less scheme costs. The residual value of a scheme is compared with a benchmark land value and if it exceeds this, the scheme is said to be viable.

Typologies

3. In consultation with the Broads Authority, a suite of case study typologies was drawn up. The typologies were reflective of the type of sites likely to come forward over the life of the new Local Plan, including allocations in the Local Plan.
4. Typologies are tested on both brownfield (BF) as well as greenfield (GF) sites. The brownfield sites are split further into waterfront and general (inland) sites. They range in size from 1-unit up to 100-units and include a specialist older person housing scheme. Typologies above and below the national 10 dwelling affordable housing threshold were included, to ascertain whether smaller sites are able to support an affordable housing contribution.
5. Residential moorings are beyond the scope of this study and it is considered that they will come forward if it is viable and practical to do so.

Testing assumptions

6. Based on Land Registry data, two distinct residential value areas, general (inland) and waterfront, were identified. House prices were found to be higher in the waterfront value area.
7. For build costs, the Build Cost Information Service (BCIS) was the primary data source. Additional costs for plot costs and site infrastructure were also identified. Allowances were also made for recent updates to Building Regulations Part L, O, F and S, as advised by BCIS.
8. In arriving at a benchmark land value (BMLV) for the Broads Authority, a number of data sources were reviewed including existing use values. From these, a range of BMLV were identified ranging from £350,000 per gross ha for a greenfield site through to £450,000 per gross ha for brownfield land and £720,000 for a brownfield waterfront site.
9. Other costs and values have been benchmarked to industry standards or based upon published sources including government impact assessments.

Draft policies

10. The viability assessment has taken account of the cost implications of policies in the Regulation 19 Publication Local Plan 2041 that will impact on development viability. This includes policies for affordable housing, which in turn refers to the policies of the six districts that retain responsibility for housing across the BA. Affordable housing was tested as 33% of development units, reflecting the predominant requirement across the BA. Single unit development was tested without affordable housing.
11. Policies reviewed and implications taken into account in the testing include:
 - Policy PUBDM2: Embodied Carbon
 - Policy PUBSP1: Responding to the Climate Emergency
 - Policy PUBDM6: Boat wash-down facilities
 - Policy PUBDM7: Water efficiency and re-use
 - Policy PUBSP2: Strategic flood risk policy
 - Policy PUBDM8: Development and flood risk
 - Policy PUBDM16: Biodiversity Net Gain
 - Policy PUBDM17: Mitigating Recreational Impacts
 - Policy PUBDM18: Mitigating Nutrient Enrichment Impacts
 - Policy PUBDM20: Energy demand and performance of new buildings (including extensions)
 - Policy PUBSP15: Residential development
 - Policy PUBDM43: Affordable housing
 - Policy PUBDM48: Elderly and specialist needs housing
 - Policy PUBDM51: Custom/self-build
 - Policy PUBDM52: Design
 - Policy PUBDM53: Source of heating
 - Policy PUBDM55: Non-residential development and BREEAM
 - Policy PUBDM60: Planning obligations and developer contributions.
12. A number of sensitivity tests were carried out to consider the effect of possible alternative market scenarios including the following;
 - a) The introduction of Future Homes as proposed by the previous government administration in December 2023 through a consultation document and impact assessment. Two options were put forward in the consultation document– option 1, the more expensive option, was used for this viability study because this best improves energy efficiency for occupiers
 - b) The effect of switching all affordable rented units to social rent
 - c) The impact of higher build costs on general typologies.

Residential testing results and implications for policy

13. The results of the viability testing present a picture of good general viability and ability to deliver policy compliant affordable housing for most residential typologies across the Broads Authority, with headroom in many instances for further policy costs as well as those associated with national policies such as Future Homes, should it be taken forward by the new government.
14. The 1-unit typology however is not viable and would not be able to make a contribution to affordable housing. This is not unusual for single-unit typologies which are often built non-speculatively for occupation by the household that commissioned the development, or where a small developer/contractor builds at a lower profit margin.
15. The 3-unit typology on general brownfield sites, whilst viable with affordable housing in the main testing scenario, is weakened where additional costs are applied, although this is not the case for waterfront or greenfield typologies. Again, with the exception of the 3-unit general brownfield typology and the 1-unit typology in all areas, delivery of social rent is viable should this be the preferred affordable rented tenure.
16. Specialist older persons housing was only viable with affordable housing in the waterfront area.
17. The good viability achieved on most residential development typologies indicates headroom to respond to market changes, higher development costs or land values if applicable over the plan period.

Policy implications for residential development

18. An affordable contribution of at least 33% is achievable on most typologies across the Broads Authority, including on those of fewer than 10 dwellings. The clear exceptions to this in viability terms are developments of 1-unit on any site type and older persons housing apart from on waterfront sites. For the typologies of 3-units a contribution is realistic on waterfront sites and greenfield sites – on general (inland) brownfield sites collection is still feasible but could be compromised if there are additional development cost pressures such as higher environmental costs. As some results are positive, the authority could still ask for a contribution on these sites but may then have to assess a viable contribution on a site-by-site basis.
19. Potential national increases in development standards in respect of carbon reduction (such as Future Homes for residential development and Future Buildings – for non residential development) would reduce residual values but does not change our conclusion. Similarly for local policies for carbon reduction such as Policy PUBDM20: Energy demand and performance of new buildings (including extensions).
20. As well as affordable housing, the testing included allowances for policies in the Publication Local Plan, including:
 - Biodiversity Net Gain at 20%
 - Accessibility to Building Regulations M4(2) standard on every dwelling
 - Accessibility to Building Regulations M4(3) standard on 10% of affordable homes

- Self and custom build housing at 5% on sites of 100 dwellings or more.

The results of the viability testing show these policies to be achievable.

Non-residential development

21. For non residential development, there is a limited number of policies that directly impact on development viability. Those that do include BREEAM and Biodiversity Net Gain. Whilst this does increase the cost, the impact of these policies is minimal and would not, either on their own or in combination, effect delivery of these forms of development.

Chapter 1 Introduction

Context

- 1.1** The Broads Authority (BA) is reviewing its Local Plan. The new Local Plan will set out the opportunities for development across the Broads Authority Executive Area for the period up to 2041 alongside the policies to support that development, as well as policies to conserve and enhance the natural environment. As part of the review process, the BA needs evidence to demonstrate the deliverability of potential future policies, including what balance of affordable and market housing is viable and whether this varies across the area.
- 1.2** The assessment includes an analysis of the impact of the policies set out in the Publication Local Plan and has been undertaken in accordance with national policy and guidance - including the December 2023 National Planning Policy Framework and Planning Practice Guidance.
- 1.3** Underlying the assessment is a series of tests that calculate the viability of a set of notional sites, representative of the types of development likely to come forward over the life of the Local Plan. The Viability Assessment has been prepared in consultation with the development industry and other key stakeholders.
- 1.4** Unlike other local planning authorities, those covering National Parks and the Broads are **not** the local housing authority. The designated Broads Authority Executive Area covers parts of Norfolk and North Suffolk, as shown on the map below. The area includes parts of Broadland District, South Norfolk District, North Norfolk District, Great Yarmouth Borough, Norwich City, and East Suffolk Council area. Together, these are referred to as the district authorities or as the districts throughout the report. The districts for those areas do not have planning powers in the Broads area but retain all other local authority powers and responsibilities. Norfolk County Council and Suffolk County Council are the county planning authority for their respective part of the Broads, with responsibilities that include minerals and waste planning, and are also the Lead Local Flood Authority.

Figure 1.1 Broads Authority Executive Area (in green)



1.5 It is important to note that the BA in preparing its Local Plan has had regard to the affordable housing policies of the districts.

Viability in plan making

- 1.6** An individual development can be said to be viable if, after taking account of all costs, including central and local government policy and regulatory costs and the cost and availability of development finance, the scheme provides a competitive return to the developer to ensure that development takes place and generates a land value sufficient for the landowner to sell the land for the development proposed. If these conditions are not met, a scheme will not be viable.
- 1.7** This report sets out the typologies and assumptions used to inform the viability testing reflecting latest available information. The viability testing for this report has:
- Reviewed broad costs associated with addressing the proposed policies in the Publication Local Plan
 - Tested the quantum and broad form of proposed development
 - Been designed to assess the balance around development contributions including the amount of affordable housing that development can support and whether there are differences in viability across different areas within the Authority or between different types of development that are sufficient to justify different policy approaches.
- 1.8** The testing has drawn on the following evidence:
- Review of the types of sites outlined in the Publication Local Plan
 - Review of the policies in the Publication Local Plan and central government guidance that may have implications for development viability
 - Review of recent planning consents including details on unit sizes, density, built form
 - A review of recent developer contributions agreed by the BA as well as discussion with Authority officers about the proposed use of s106 going forward
 - Consultation with BA officers and with officers from the six districts, including planning and housing
 - Desk research to form initial views on the values and costs of residential development in BA
 - A range of consultation exercises with the development industry and registered providers (housing associations).
- 1.9** In addition to this report a technical appendix provides further evidence and background information in support of the analysis undertaken.

Chapter 2 Local and national policy context

National policy

- 2.1** National policy and guidance on viability for plan making and Community Infrastructure Levy is set out in [National Planning Policy Framework](#) (NPPF) December 2023 and the [Planning Practice Guidance](#) (PPG). There is also useful guidance contained within 'Viability Testing Local Plans - Advice for planning practitioners' (Harman 2012) and 'Assessing Viability in Planning' (RICS 2021). The viability testing undertaken within this study complies with this national policy and guidance, the details of which are set out in Appendix I.
- 2.2** There are a number of other national policies recently introduced that have a bearing on development costs and which have been included in the viability testing undertaken. These include:
- More stringent requirements to improve building standards, including to reduce carbon emissions in new homes, particularly the update to Building Regulations Part L (conservation of fuel and power), Part F (ventilation) and Part O (overheating)
 - Update to Part S - Infrastructure for Charging Electric Vehicles which requires new development to provide electric vehicle charging points where a parking space is provided or cabling elsewhere
 - Provision for biodiversity net gain introduced through the Environment Act 2021, with 10% net gain a mandatory requirement for most development types from April 2024
 - The introduction of First Homes, providing a nationally defined low cost home ownership option and a requirement through a Written Ministerial Statement (24 May 2021) that these should form a minimum of 25% of affordable housing units secured through developer contributions.
- 2.3** In July 2024 the incoming Labour government introduced a [consultation on a wide range of changes to the NPPF](#). Whilst this is not yet policy it is prudent to be mindful of some of the proposals. Implications for viability testing are focussed on the provision of affordable housing in that there is a stronger emphasis on social rent as an affordable tenure and a proposal to remove the requirement that a minimum of 25% of affordable housing units should be First Homes. It is also proposed that the requirement that 10% of units on s106 sites should be for affordable home ownership be removed. These proposals have been accounted for in our viability modelling.
- 2.4** In December 2023 the previous government issued a consultation on the [Future Homes and Buildings Standard](#) which seeks to make further improvements to the level of carbon emissions in new homes and non-domestic buildings and is anticipated to come into force in 2025. The status of this document and which options may be pursued is unclear since the July 2024 change

of government but we nonetheless comment on headroom for the additional related costs associated with the standard should it be introduced.

Local Plan policy

- 2.5 It is intended that the new Local Plan will replace the existing Local Plan for the Broads 2015-2036, adopted May 2019. The NPPF is clear that viability testing should take into account the costs of any requirements arising from the Local Plan likely to be applied to development (paragraphs 34 and 58).
- 2.6 Table 2.1 below summarises the policies in the Publication Local Plan 2041 which have viability implications which have been taken into account in the testing, alongside other national requirements.

Table 2.1 Publication Local Plan strategic policies with viability implications

Policy	Response
Policy PUBDM2: Embodied Carbon	<p>The testing has been carried out to Building Regs 2021 standard for Parts L, O, and F and included additional cost as estimated by BCIS.</p> <p>Comment is provided on the impact of higher standards for the Future Homes Standard and The Future Buildings Standard.</p>
Policy PUBSP1: Responding to the Climate Emergency	<p>The EVA has tested development to Building Regs 2021 standard for Parts L, O, and F and included additional cost as recommended by BCIS.</p> <p>EV charging points for every dwelling (Part S).</p> <p>Allowance for Biodiversity Net Gain.</p> <p>Comment is provided on the impact of higher standards for the Future Homes Standard and The Future Buildings Standard.</p> <p>The testing identifies the viability headroom available for additional building efficiency standards such as the implementation of the Future Homes and Future Buildings Standard (s)</p>
Policy PUBDM6: Boat wash-down facilities	<p>Account is taken within site infrastructure allowances and/or accounted for within land value.</p>
Policy PUBDM7: Water efficiency and re-use	<p>Allowance made for water efficiency within build and infrastructure costs.</p> <p>BREEAM is discussed within the non-residential section</p>
Policy PUBSP2: Strategic flood risk policy	<p>Allowances for drainage, including SUDS included within build and infrastructure costs.</p>
Policy PUBDM8: Development and flood risk	<p>Allowances for flood resilience and mitigation is made within the viability testing for waterfront development, where higher build</p>

Policy	Response
	costs are used, noting that any significant measures required should also be reflected in the land value.
Policy PUBDM16: Biodiversity Net Gain	Cost allowances are made within the viability testing for provision of 20% BNG.
Policy PUBDM17: Mitigating Recreational Impacts	Allowance made within testing for Recreation Disturbance Avoidance and Mitigation Strategies (RAMS)
Policy PUBDM18: Mitigating Nutrient Enrichment Impacts	This affects parts of the BA designated area and comment is made on headroom for these mitigations.
Policy PUBDM20: Energy demand and performance of new buildings (including extensions)	The viability testing allows for financial headroom which is available to meet any costs arising from the impact of higher standards for the Future Homes Standard and The Future Buildings Standard is discussed.
Policy PUBSP15: Residential development	The Plan sets out how the objectively assessed housing need of 358 dwellings over for the Plan period (2021 to 2041) will be met. For the purposes of establishing typologies, housing mixes, unit sizes and type are determined by the 2017 SHMA, the policies and practice of the six districts and boroughs within the area of the Broads Authority as well as an analysis of past delivery and permitted development.
Policy PUBDM43: Affordable housing	Major development is tested with 33% affordable housing; a percentage which is high enough to cover the varying levels of affordable housing contributions required by all six districts and boroughs. Smaller development typologies are also tested for ability to provide an off-site contribution. Affordable housing mix is based on the policies, needs and past and potential delivery of the BA and the six districts and boroughs.
Policy PUBDM48: Elderly and specialist needs housing	The viability testing includes typologies for older person housing.
Policy PUBDM51: Custom/self-build	Typologies of 100 or more dwellings are tested with 5% custom/self-build homes.
Policy PUBDM52: Design	The viability assessment allows for additional costs associated with meeting the requirement that all homes should be built to building standard M4(2) as a minimum and that the M4(3)a accessibility standards is applicable to 10% of affordable homes. The policy references the Design Guide which, whilst it does not set out specific items that may incur extra costs, it does put

Policy	Response
	forward a high standard of design. To take account of this, all waterfront typologies employ upper quartile build costs from BCIS. Additionally, as a sensitivity test, upper quartile costs are used in testing non-waterfront residential typologies.
Policy PUBDM53: Source of heating	The testing has been carried out to Building Regs 2021 standard for Part L and included additional cost as recommended by BCIS. Comment is provided on the impact of higher standards for the Future Homes Standard and The Future Buildings Standard.
Policy PUBDM55: Non-residential development and BREEAM	Non-residential analysis includes BREEAM Very Good Standard and higher credits for larger buildings
Policy PUBDM60: Planning obligations and developer contributions	Developer contributions are based on past collection and future aspirations as advised by the Authority.
Policy PUBNOR1: Utilities Site	This allocated site is not included in the testing as it is subject to a separate viability assessment

Allocated sites

- 2.7** The Publication Local Plan does not make any specific housing allocations that do not already have planning permission, with the exception of Policy PUBNOR1: Utilities Site which is allocated for mixed-use development including potential for around 250 dwellings.
- 2.8** Policy NOR1 deals with the redevelopment of the Utilities Site which is part of the wider East Norwich Regeneration Area, the majority of which is allocated for sustainable mixed use redevelopment in the Greater Norwich Local Plan. It sets out that “Redevelopment of this area will be sought to realise its potential contribution to the strategic needs of the wider Norwich area. The site is allocated for mixed-use development which could include around 250 dwellings”. This site is subject to a separate viability assessment for the wider East Norwich regeneration area to support development of a Supplementary Planning Document and for this reason has not been included in our testing for the Broads Authority. This position has been agreed with the Broads Authority and Norwich City Council.

Consultation with the development industry

- 2.9** The PPG sets out that:

“Plan makers should engage with landowners, developers, and infrastructure and affordable housing providers to secure evidence on costs and values to inform viability assessment at the plan making stage.” (Paragraph: 006 Reference ID: 10-006-20190509)

2.10 Consultation with the development industry, undertaken for this assessment, involved a range of activities which provided opportunities for the development industry to engage with the process. The activities were:

- A workshop consultation exercise with developers active within the Authority in June 2024 (a note of the workshop is appended at Appendix II)
- A note of the workshop was sent to those who attended, those who sent apologies as well as a longer list of known developers in the area, offering a further opportunity to comment or discuss – consequently follow up consultation with individual developer stakeholders during August 2024
- Consultation with housing associations active in the Authority and the surrounding area to discuss assumptions for affordable housing and issues around delivery; these took place during July and August 2024.

2.11 The industry consultation was broadly supportive or raised no issues with the majority of viability assumptions accepted. Some stakeholders raised the following issues:

- Values tend to be very specific to individual sites, although for the purposes of this high-level exercise the values and variations for waterfront and inland sites was about right
- First Homes are not considered a suitable product in the Broads
- The proposed 3-bed market home was considered too large at 110 sqm – this was subsequently reduced
- Land values would be expected to flex to accommodate additional abnormal development costs such as piling
- Consultation with the housing associations mainly confirmed our affordable housing assumptions, although it was commented that the size of a 4-bed home and the rate of finance capitalisation were both too low – these were subsequently raised.

Chapter 3 Approach to testing and viability

Approach viability and typologies

3.1 As is standard practice and described in PPG (Paragraph: 010 Reference ID: 10-010-20180724), we have adopted a residual value approach to our analysis. Residual value is the value of the completed development (known as the Gross Development Value or GDV) less scheme costs. The value of the scheme includes both the value of the market housing and affordable housing. Scheme costs include the costs of building the development, plus professional fees, scheme finance and a return to the developer as well as any planning obligations or other policy costs and the costs of the land (as a benchmark land value) and its purchase, as described in PPG:

“Viability assessment is a process of assessing whether a site is financially viable, by looking at whether the value generated by a development is more than the cost of developing it. This includes looking at the key elements of gross development value, costs, land value, landowner premium, and developer return.”

3.2 In respect of the types of sites to test, PPG states that:

“Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. Plan makers can use site typologies to determine viability at the plan making stage”. (Paragraph: 003 Reference ID: 10-003-20180724)

3.3 This has informed our approach to testing and use of typologies as a high-level proxy for sites likely to come forward during the life of the Publication Local Plan.

Uses included in the testing

3.4 The uses tested are listed below and focus on developer-led forms of development rather than publicly led uses such as new infrastructure facilities or development types that are not common:

- Residential for sale
- Older person homes
- Non-residential.

Typology selection

3.5 We worked with the Authority draw up a suite of typologies. These are intended to reflect the type of sites likely to come forward over the life of the new Local Plan. These generic typologies are not intended to represent specific development proposals but to reflect typical forms of development that are likely to come forward over the plan period. The typologies were shared with stakeholders during the consultation process, where it was agreed that these were broadly representative. These are set out below.

Residential typologies

- 3.6** The generic residential typologies are set out in Table 3.1. These include sites above and below the 10-dwelling NPPF threshold for affordable homes generally. The proportion of net developable area reflects policy requirements as well as typical characteristics of this site type.
- 3.7** Typologies are tested on both brownfield (BF) as well as greenfield (GF) sites. The brownfield sites are divided further into waterfront and general (inland) sites.
- 3.8** For brownfield sites, the testing does not assume that there is any existing floorspace on the site. It is possible that this will be the case in practice and that there will be existing space that should be netted off against the affordable housing liability, thus increasing the residual value and strengthening the viability position of the scheme. (see PPG Paragraph: 027 Reference ID: 23b-027-20190315) However, this can only be realistically assessed on a scheme by scheme basis, at planning application. The approach taken in this study is a conservative one which will therefore tend to under estimate viability on some brownfield sites.
- 3.9** The residential typologies are labelled Res1 through to Res 7 and the older persons typology is labelled OP1. The dwelling sizes and mixes are set out in the testing assumptions in Chapter 4.

Table 3.1 Typologies

Reference	Number of dwellings	Density - dwellings/ hectare	Gross site area (hectares)	Net site area (hectares)
Res 1	1 unit		0.067	0.067
Res 2	3 units	15 dph	0.2	0.2
Res 3	5 units	15 dph	0.33	0.33
Res 4	8 units	20 dph	0.4	0.4
Res 5	12 units	20 dph	0.63	0.63
Res 6	30 units	25 dph	1.33	1.2
Res 7	100 units	30 dph	3.11	2.33
OP 1	50 units sheltered	100 dph	0.5	0.5

Note - self and custom build homes were included in Res 7 (100 units) – 5% of total

- 3.10** Residential moorings are beyond the scope of this study and it is considered that they will come forward if it is viable and practical to do so.

Affordable housing requirements

3.11 Local Plan policy PUBDM43 requires that the affordable housing contribution from development is delivered “in accordance with the requirements of the adopted standards and policies of the relevant District Council”. The requirements in the local plans are set out in the table below, noting that the most relevant local plans are at different stages.

Table 3.2 Affordable housing policies from the districts

District	Plan	Policy ref	% requirement
East Suffolk (1)	Suffolk Coastal Local Plan Adopted September 2020	Policy SCLP5.10	33%
East Suffolk (2) (Lowestoft)	Waveney Local Plan Adopted March 2019	Policy WLP8.2	20%
East Suffolk (2) (rest)	Waveney Local Plan Adopted March 2019	Policy WLP8.2	30%
Great Yarmouth	First Draft Local Plan Consultation 13 March to 8 May 2024	HOU1	25%
North Norfolk (zone 1 - Broads)	Local Plan proposed submission version publication stage regulation 19 January 2022	HOU2	15%
North Norfolk (zone 2 incl Hoveton)	Local Plan proposed submission version publication stage regulation 19 January 2022	HOU2	35%
Norwich / South Norfolk / Broadland	Greater Norwich Local Plan (adopted March 2024)	Policy 5	33%

3.12 In our testing we have used a base point of 33% affordable housing as this covers the majority of the designation Broads Authority area. We note that the percentage is lower in the emerging Great Yarmouth Local Plan as well as most of North Norfolk and parts of East Suffolk, therefore in those areas the viability assessment takes a cautious approach and viability is likely to be stronger in practice than reported here. There is small part of North Norfolk that requires a higher percentage (35%) but we understand that much of the area within the BA is in a flood plain and unlikely to see much development.

3.13 Further discussion about value areas can be found in Chapter 4.

3.14 We have tested typologies above and below the national 10 dwelling affordable housing threshold to ascertain whether smaller sites are able to support an affordable housing contribution.

3.15 Sites with affordable housing are tested with an affordable tenure mix of 70% affordable rent and 30% shared ownership as this best reflects the policies and housing need of the districts. Although the districts and Registered Providers (RPs) report that most affordable rented housing is expected to be affordable rent, especially on s106 sites, there is a national and local shift towards social rent and we have also carried some sensitivity testing where the affordable rented homes are switched to social rent.

Non-residential typologies

3.16 Non-residential development is discussed in Chapter 6 where comment is made on the typologies that will potentially come forward in the BA and the policy cost implications.

Chapter 4 Testing assumptions

4.1 We used a range of data sources, including government impact assessments, national datasets, local examples of development, to draw up a series of assumptions that were reviewed at the development industry workshops, adjusted as necessary following feedback, with a final set of testing assumptions agreed with the BA. The final set of assumptions were used in the viability testing. This chapter summarises the key assumptions and the data they rely on.

Dwelling mix, unit size and tenure

4.2 The overall size and mix of dwellings in the typologies used in the testing takes account of requirements from the local plans of the districts, the [Local Housing Needs Assessment 2022](#) (version 2), recent planning applications in the BA and feedback received from local developers, Registered Providers (RPs) and officers.

4.3 The tenure mix of the affordable housing also relies on the policies of the districts and consultation to arrive at a split between rented and shared ownership homes. On the advice of the Authority, local RPs and other stakeholders, the tenure mix does not include First Homes taking into account the WMS discussed in chapter 2 and the consistent feedback that this tenure is not suitable or desirable in the BA.

4.4 The size of dwellings used, affects both their market value (as sale values were assessed on a per sq m basis) and their development costs – also based on dwelling size. Unit sizes meet Nationally Described Space Standards (NDSS). Development costs for flats will include non-saleable circulation and common areas, although we have assumed that flatted development will be 1-2 storeys, often ‘maisonette style’ with more limited communal areas:

- for schemes with 1 -2 storeys the allowance is 10%
- an allowance of 25% floor area is added for sheltered homes, which allows for circulation, common and service areas and has been informed by discussion with the retirement housing industry.

4.5 The housing mixes used for the generic typologies in the study are shown in tables 4.1 and 4.2 below.

Table 4.1 Market housing mix and size for residential typologies – showing differences between typologies

	sqm	1-unit and 3-unit typologies	100-unit typology	Specialist older persons 50 units	all other typologies i.e. 5, 8, 12, 30 units
1 bed flat	55		10%	50%	
2 bed flat	70		5%		
2 bed flat (older persons)	75			50%	
2 bed house	80		25%		33%
3 bed house	95	100%	30%		33%
3 bed bungalow	95				
4 bed house	140		30%		33%
5 bed house	190				
		100.00%	100.00%	100%	100.00%

Table 4.2 Affordable housing mix and size for residential typologies Res 3-7 (5, 8, 12 30 and 100 units)

	Sqm	Rented (70% of affordable mix)	Shared ownership (30% of affordable mix)
1 bed flat	50	20%	
2 bed flat	61		
2 bed house	79	40%	50%
3 bed house	93	30%	50%
4 bed house	106	10%	

4.6 The affordable mix for the 1-unit typology (Res 1) and 3-unit typology (Res 2) was tested with 3-bed houses only and for the specialist older persons typology (OP1) there was a 50/50 split between 1 and 2-bed flats.

Values – standard residential market

4.7 Unlike defined local authority areas, there was no one definitive data source available from which to derive market values for the BA. We therefore relied on a range of published sources to arrive at market values:

- Land Registry data for new build properties for parishes where some part of the parish was within the Broads Authority area. The data was taken over the last five year period and

updated by the House Price Index to end of quarter 1 2024 (the latest date at which there was sufficient data to generate a reliable indexation); the Land Registry data was matched to Energy Performance Certificates to enable a value per sq m to be generated for the different house types, based on over 1,000 records

- An analysis of property available on Rightmove, where dwelling sizes and price were both available
- The house prices from the previous viability study (Hampson Barron Smith 2018) were updated by the latest House Price Index
- A sense check was made to recent valuations for homes known to be within the BA.

4.8 A value of £3,750 per square metre was arrived at which is slightly below the value of £3,900 which was presented to and endorsed by the developer workshop but takes into account later comment that prices are often location specific in practice and vary across the Broads. On this basis we adopted a more cautious approach and the value of £3,750 per square metre.

4.9 There was clear comparative evidence in the sales data that properties in waterfront locations achieve values significantly above other, inland, locations. Where locations are waterfront we have added a further 30% to values for all property types. Again, there was agreement by the development industry consulted that, for this high-level plan wide testing, this was 'about right'. Therefore two value areas have been identified; general (or inland) and waterfront.

4.10 Where properties are identified as bungalows the data supports a 20% value uplift for this type of dwelling. Older persons units are based on the recommendations made by the Retirement Housing Group (RHG) Viability Guidance 2016, with the value of a 2-bed apartment being equal to the resale value of a semi-detached house and a 1-bed at 75% of this.

4.11 The values used in the viability testing are shown for each value area in Table 4.3 below. These are shown as unit values, based on the sizes set out in the housing mix section earlier in the chapter. The background data for the house price analysis, including sample data from Land Registry, can be found in Appendix III.

Table 4.3 Market values

Unit Type	Size - sqm	Value – general (inland)	Value - Waterfront
1 bed flat	55	£206,250	£268,125
2 bed flat	70	£262,500	£341,250
2 bed house	80	£300,000	£390,000
3 bed house	95	£356,250	£463,125
3 bed bungalow	95	£427,500	£555,750
4 bed house	140	£525,000	£682,500
1 bed flat – sheltered (C3)	55	£267,200	£347,350
2 bed flat – sheltered (C3)	75	£356,250	£463,125

Source: Land Registry/EPC and local data

4.12 The custom and self build homes were modelled as 3-bed detached units and an additional 5% was added to the value. This is consistent with published research undertaken by Three Dragons with the Right to Build Task Force into the costs and values of self-build and custom housebuilding (Area-wide Approaches to Viability Assessment Right to Build Task Force & Three Dragons July 2023 Guidance Note PG3.7).

Values - Affordable housing

4.13 Initial estimates of the value of affordable housing were produced using a capitalised net rent approach i.e. the notional amount the provider of the unit can borrow against the net income received. The assumptions were based on known industry standards informed by an analysis of annual reports for six actively developing RPs (A2 Dominion; Accent; Aster; L&Q; Stonewater; Sovereign 2023) as well as the government global accounts (2022) and these were then used as the basis of consultation with RPs active in the BA, with input from the housing districts.

4.14 In calculating the capitalised net rent the assumptions set out in the table below were used, following the consultation.

Table 4.5 Affordable housing assumptions

Type	Assumption
Affordable housing rent	
Affordable Rent	100% LHA rate
Social rent	75% LHA rate
Management & maintenance (annual)	£1,250
Voids/bad debts	2.5%
Repairs reserve (annual)	£600
Capitalisation	5%
Service charges (weekly)	Flats - £7 Houses - £5
Affordable housing – shared ownership	
Share size	40%
Rental share	2.75%
Capitalisation	5%
Repairs	£4,000

4.15 The affordable housing assumptions were discussed at the developer workshop and with local Registered Providers (RPs) in one-to-one interviews and checked against the accounts referred to in paragraph 4.13 above (where the information was quoted). No significant alternatives to our approach were identified but some adjustments were made with increases to the management and maintenance charge and the capitalisation rates and a decrease in the initial share purchased, to account for a changing market.

4.16 The table below summarises the values attributed to the affordable housing property types included in the testing, using these assumptions.

Table 4.6 Affordable homes values (figures are rounded)

Summary	Capital value for social rent	Capital value for affordable rent	Shared ownership - Value General (Inland)	Shared ownership - Value Area Waterfront
1 bedroom flat	£66,000	£94,000	N/A	N/A
2 bedroom house	£85,000	£118,000	£206,000	£268,000
3 bedroom house	£103,000	£142,000	£243,000	£317,000
4 bedroom house	£165,000	£224,000	£277,000	£362,000

Development costs

Build costs

- 4.17** The Build Cost Information Service (BCIS) provides benchmarking information for build costs, adjusted for the location. Residential build costs are based on actual tender prices for new builds and the tender price data is rebased to 1st Quarter 2024 (in line with values) and Norfolk location prices using BCIS defined adjustments, to give the build costs for different types of schemes.
- 4.18** We understand from work with housebuilders and cost consultants that volume and regional house builders can comfortably operate within the BCIS lower quartile cost figures, especially given that they are likely to achieve significant economies of scale in the purchase of materials and the use of labour. Many smaller and medium sized developers of houses are usually unable to attain the same economies, so their construction costs may be higher although this will vary between housebuilders and sites. We have worked with BCIS to identify how costs change according to the size of the development. We have used this analysis by BCIS to inform our approach to testing in the BA. The variable build costs by site size have been applied to houses only, as flat build costs primarily vary by height.
- 4.19** Our testing also accounted for the higher build costs reported by developers for waterfront development, where we have used upper quartile costs. In addition, we have tested some of our general (inland) typologies with the higher quartile build costs, noting that the (draft) BA Design Guide includes some higher quality design standards and principles which may come forward on some (but not all) sites away from the waterfront.
- 4.20** For self build and custom housebuilding an additional 5% was added to build costs. This is consistent with published research undertaken by Three Dragons with the Right to Build Task Force (Guidance note PG3.7 Area-wide Approaches to Viability Assessment Right to Build Task Force & Three Dragons July 2023).

Table 4.7 Residential development costs

Type	Base build cost – mean £/sq m	Base build cost – upper quartile £/sqm	Site sizes (number homes)
One off detached	£2,678	£3,171	1
Estate housing (index +5% and self-build))	£1,513	£1,617	2-5
Estate housing (as per index)	£1,441	£1,578	6-9
Estate housing (index x 95%)	£1,369	£1,499	10-50
Estate housing (index x 92%)	£1,326	£1,452	51-100
Bungalows	£1,720	N/A	2-5
Flats 1-2 storey	£1,605	N/A	All
Supported housing	£1,818	N/A	All

Source: BCIS – see Appendix V for BCIS report

Other residential development costs

- 4.21** A range of other standard costs have been used in the viability testing. These were discussed with the development industry at the workshop and are based on PPG and experience of other high level plan making viability testing. Further information providing background to some of the costs is set out in the following table.
- 4.22** Allowances are made for an additional 15% on build costs for plot costs, site infrastructure works and contingency. These are industry standards on which we monitor what is happening elsewhere in similar locations in the UK as well as consulting with the local development industry.
- 4.23** Separate allowances are made for garages and we have allowed for a single garage for all 4 bed detached homes. This is on the basis that not all detached homes will have a garage but some may have a double. No allowances are made for garages for semi-detached, terraces or within the flat led developments as is usual for the BA.
- 4.24** A cost is included below for Future Homes 2025 (see chapter 2 for summary of what this entails). This proposed standard was introduced by the previous government and is still at consultation stage with no indication of how it might be taken forward. We do not therefore include it in the standard testing but nonetheless comment on available viability headroom should it be adopted nationally. Costs are based on the government impact assessment (DLUHC December 2023). There are two options included in the consultation and we have taken Option 1 which is the higher cost because this option takes better account of the cost to the consumer. We have also increased the cost to account for the larger dwelling sizes in the BA. This approach was agreed with the Authority.

Table 4.8 Other residential development costs

Type	Cost	Metric
Site costs		
Plot costs, site infrastructure works and contingency – all typologies	15%	On build cost
2021 updates to Building Regulations (as recommended by BCIS June 2023)	3.9%	On build costs Part L 2.8% Part F 0.4% Part O 0.7%
Garages	£8,100 per single garage	4 bed detached and single units
Fees and finance costs		
Professional fees	10%	of build costs including plot costs/contingency
Finance	7%	of total development costs including land purchase
Marketing/legal/sales fees	3% 6%	of market GDV of older persons GDV
Affordable home legal fee	£500	per affordable unit
Developer return	17.5% 6%	market GDV (mid point of the range set out in the PPG) affordable homes GDV
Agents and legal	1.75%	land cost (BLV)
Stamp duty	prevailing rate	land cost (BLV)
Policy and mitigation costs		
Biodiversity net gain (20%)	£1,272 £304	per unit (greenfield) per unit (brownfield)
EV charging points Part S	£865	per dwelling
Accessibility M4(2)	£1,400	per unit except for those with M4(3)
Accessibility M4(3)(a)	Flat £10,000 House £14,500	applicable to 10% of affordable units
General s106	£2,500	per unit
Self & custom build	Additional 5% build costs	5% of units on sites of 100 homes plus (not flats)
Future Homes 2025 (Option 1)	House £6,000 Flat £4,000	Applied as a sensitivity test

National and local policy requirements

4.25 Biodiversity net gain – The allowance for biodiversity net gain (BNG) is drawn from the government’s impact assessment (MHCLG, 2019, Biodiversity net gain and local nature recovery

strategies impact assessment) which was published with the consultation on the amendments to the Environment Act. The Publication Local Plan requires 20% biodiversity net gain which is above the national requirement of 10%. The government's Impact Assessment suggests that this will increase costs to developers by 19% of the MHCLG published allowance (Section 6.11.2) - the actual costs used in the testing are shown in Table 4.8 above. A cross-typology allowance, split by greenfield and brownfield is used.

- 4.26** However, it should be noted that, as biodiversity net gain is site specific depending on both the existing site characteristics and the ability of development form to both mitigate and provide additional gain, it is difficult to gauge a suitable allowance for meeting the requirements. It is also of note that the NHBC with the RSPB have issued guidance on how to achieve net gain within new development. At the launch of the guidance both the authors and one of the major housebuilders (Barratt Homes) emphasised that incorporating measures for biodiversity net gain during the design phase meant additional costs were minimal (Biodiversity in new housing developments RSPB / NHBC April 2021). This suggests that, whilst an allowance is included, the actual cost could be much lower and therefore the testing allowances are a conservative estimate. It is also relevant that the government Impact Assessment (page 42) highlights research findings about the costs of new policies to development stating that “development costs are passed back through to land prices” and over time it is therefore land values that absorb these costs.
- 4.27 Part S EV charging** - An allowance for ‘fast charge’ electric vehicle charging points is made for all dwellings at a ratio of 1 per dwelling for general housing. On this basis the total allowance on a site basis is considered sufficient to meet need and both national and local policy. It is recognised that there is also a desire for rapid chargers, however these are generally operated (and brought forward) on a commercial basis and therefore have not been included within the costs. The EV charger costs are based upon the impact assessment produced by the government (DfT/MHCLG, 2021, Residential charging infrastructure provision impact assessment).
- 4.28 Part M Accessibility** - The accessibility costs for M4(2) are applied to every unit as per draft Policy PUBDM52: Design and are based on the government impact assessment. The costs for Part M4(3) are based on cost consultant advice and other published studies, these are applied to 10% of affordable units, again in line with the draft policy.
- 4.29 Nutrient neutrality** – Development in certain areas of Norfolk falls within the nutrient neutrality catchment area of the Broads SAC and Broadland Ramsar. Policy PUBDM18 requires that this is mitigated before development can go ahead. As the policy does not cover the entire BA area, we comment on headroom available for this mitigation using the costs of credits which, based on assessments some of the districts provided through the consultation process, is £3,500 per dwelling, although this can vary in practice.
- 4.30** The cost of nutrient neutrality is in addition to the recreational mitigation cost collected through payment of either Suffolk Coast or Norfolk, Recreation Disturbance Avoidance and Mitigation

Strategy (RAMS), which is assumed to be collected for every unit tested and therefore included within the testing.

Benchmark land value

4.31 National guidance on setting benchmark land values (BMLVs) is clear that BMLVs should not be based on market values (although these can be used as a sense-check), or indeed the price paid for a particular site, but rather on the existing value of land plus an uplift to provide an incentive to the landowner. The appropriate scale of the uplift is not set out in any of the current guidance, although PPG does define that a ‘premium’ for a landowner should:

“Provide a reasonable incentive for a land owner to bring forward land for development while allowing a sufficient contribution to fully comply with policy requirements” (PPG Paragraph: 016 Reference ID: 10-016-20190509).

4.32 However, a landowner premium of 10-30% for brownfield land and 10-20 x agricultural value for greenfield land is well established as an industry norm for strategic high level viability studies (see Homes and Communities Agency, 2010, Appendix 1 (Transparent Viability Assumptions p9). More recent research from [Lichfields \(2020\)](#) has a similar finding.

“Unsurprisingly, the level of uplift was found to vary, with an increase of 20% common for brownfield sites and a multiplier of 15-20 times above EUV or an uplift of 20% plus an additional allowance of between £250,000 and £650,000/ha being applied in respect of greenfield sites.”

4.33 In arriving at a benchmark land value for the BA, we have reviewed data for existing use values as well as checking against land values used in previous viability studies for the BA and for the housing districts (both area wide and site specific) and known values achieved within and adjacent to the BA. We have used a range of figures in the testing, from £350,000 per gross ha for a greenfield site through to £720,000 per gross ha for waterfront brownfield land. General inland brownfield typologies have a benchmark land value of between £400,000 and £450,000 hectare, dependent on location, and we have tested at both rates.

4.34 The values were presented to the developer workshop which commented that the values seemed ‘broadly reasonable’ and did not offer any other alternatives, although cautioned that abnormal costs such as piling should be reflected in land values – as per PPG which states that abnormal costs as well as site infrastructure costs should be taken into account when defining the land value (Paragraph 012 Reference ID: 10-012-20180724).

4.35 In arriving at the benchmark land values we use, we understand that where the market is able to pay a higher premium, it will do so. However, the guidance in the PPG is clear that benchmark land values should not be based on market values.

4.36 The table below shows the full range of benchmark land values that can be achieved within the ‘industry standard’ premium range described above. Where a site is of poorer quality or has

marginal viability then we would expect the lower value point to be achieved and there will be some premium sites where the higher value point can be reached.

Table 4.9 Benchmark Land Values

Site type	BLV/ha	Based on	EUV Source
Greenfield	£350,000	15 times agricultural value	3D review, MHCLG* + land value inflation**
Brownfield 1	£400,000	Standard brownfield EUV + 20%	MHCLG* - industrial land for the housing districts excluding Greater Norwich) Review of local viability studies
Brownfield 2	£450,000	Standard brownfield EUV + 20%	MHCLG* - industrial land for the housing districts including Greater Norwich Review of local viability studies
Brownfield 3 Waterfront	£720,000	Standard brownfield EUV + 20%	MHCLG* - industrial land Greater Norwich***

* note MHCLG refers to 'Land Value estimates for Policy Appraisal' MHCLG 2019

** Savills (Rural Land Values June 2024) estimate a greenfield land value inflation of 10%

*** Based on advice that waterfront development achieves land values akin to Greater Norwich

4.37 Land values were sense checked with the market, noting that details of local transactions were limited.

Residential sensitivity testing

4.38 A number of sensitivity tests were carried out to consider the effect of possible alternative market scenarios and were:

- a) **The effect of switching all affordable rented units to social rent.** This would account for the growing importance of social rent as an affordable tenure that is more affordable to households on low earned incomes or subject to the benefit cap – as the rent is lower social rent has lower transfer values than affordable rent and would there reduce viability headroom.
- b) **The effect of upper quartile build costs on general brownfield development.** This helps examine the potential for higher development costs association with the Design Guide.
- c) **The impact of delivering bungalows.** We have tested the 3-unit typology as a 'bungalow' scheme, noting that bungalows tend to be a popular type of home in the BA.

4.39 Finally we make comment on capacity of development to meet the Future Homes Standard or other local higher environmental requirements from Policy PUBDM20: Energy demand and performance of new buildings (including extensions) – this requires applicants “to demonstrate what measures they have taken to achieve more energy efficiency beyond the building regulation standards” (paragraph 4).

Non-residential assumptions

4.40 Non-residential development is discussed in more detail in chapter 6, although the majority of proposed policies are not considered to significantly add to the development costs for non-residential uses in the Plan period. However, to note that the following policies that may have some impact on the viability of non-residential development:

Policy PUBDM16: Biodiversity Net Gain all types of development are expected to achieve a minimum of 20% Biodiversity Net Gain (BNG). A Government Impact Assessment undertaken by DEFRA in Table 15 estimates that a 10% BNG is estimated to represent a cost of £14,334 per hectare. Further, para 6.11.2 of the same impact assessment estimates that the impact of increasing the net gain to 20% increases the cost to developers by 19%. Therefore, it is assumed that a 20% BNG could represent a cost of £17,058 per hectare.

Policy PUBDM55: Non-residential development and BREEAM non residential development above 250 sqm must achieve a minimum of BREEAM Very Good. Additionally, non-residential development above 250 sqm must also achieve 3 credits in BREEAM category Wat 01 and those over 1,000 sqm must achieve 5 credits. Historically, BREEAM has been commonly used to categorise non-residential building standards, with five categories – Pass; Good; Very Good; Excellent and Outstanding. Work undertaken by BRE suggests that the uplift over base construction costs varies between 0.1% and 0.2% for BREEAM Very Good.

Chapter 5 Results of the residential viability modelling

5.1 The results of the residential modelling are discussed in this chapter and non-residential development is discussed in Chapter 6.

Residential Overview

5.2 The base testing includes the standard development costs and affordable housing for each of the two value areas, i.e. general (inland) typologies and waterfront typologies and other policy costs as set out in chapter 4. The viability results take into account land costs, finance and developer return.

5.3 The results are shown as a net residual value per dwelling so that different development mixes and scheme sizes can be easily compared. A negative figure means a scheme is not viable (as tested). A positive residual value shows a viable scheme and represents the theoretical maximum 'headroom' available to support either additional policy costs, planning obligations and/or higher land values/developer return. Where we refer to results as 'Marginal' we define this as being up to plus/minus £5,000 per dwelling. This is an arbitrary definition used in this report and with the purpose of identifying typologies and policy tests where a small change in the assumptions used could switch a site from having a positive to negative residual value or vice versa.

5.4 The results of the testing are grouped under the following sub-headings and include some sensitivity testing:

- General typologies - Greenfield and brownfield
- Waterfront typologies - Brownfield
- Specialist older persons housing
- Delivery of social rent
- Higher build costs
- Headroom for further policy costs.

5.5 Results are shown with 33% affordable housing. The results shown are with the higher benchmark land value of £450,000 gross hectare for general brownfield sites, £350,000 gross hectare for greenfield sites and £720,000 gross hectare for waterfront brownfield sites – see Table 4.9 above, but other land values were tested. A full set of results showing results per scheme and per unit, as well as at the full range of land values can be found at Appendix VII.

General (inland) typologies

5.6 The following table shows the results on a per unit basis for the general typologies.

Table 5.1 Modelling results for the general typologies - £s per unit

Ref	Units	Greenfield Residual Value per unit	Brownfield Residual Value per unit
Res 1	1	-£108,800	-£115,000
Res 2	3	£13,900	£7,800
Res 2 (b/low*)	3		£29,100
Res 3	5	£29,200	£23,100
Res 4	8	£42,400	£38,000
Res 5	12	£48,200	£43,300
Res 6	30	£51,800	£47,800
Res 7	100	£50,800	£46,700

* Bungalow – typology test with 3 x 3 bed bungalows

5.7 The general typologies show good overall viability with 33% affordable housing on both greenfield and brownfield typologies. Where the 3 unit typology (Res 2) was tested with bungalows on a brownfield site, viability improved. The single unit typology (Res 1) was tested without affordable housing but was not viable on either land type, reflecting the higher costs and lack of economies of scale associated with building a single unit.

Waterfront typologies

5.8 The following table shows the results on a per unit basis for the waterfront typologies, where land values, build costs and sales values are higher than for the general testing.

Table 5.2 Modelling results for the Waterfront typologies - £s per unit

Ref	Units	RV per unit
Res 1	1	-£114,100
Res 2	3	£33,900
Res 2 (b/low*)	3	£86,400
Res 3	5	£54,700
Res 4	8	£74,600
Res 5	12	£79,800
Res 6	30	£87,000
Res 7	100	£85,400

* Bungalow – typology test with 3 x 3 bed bungalows

5.9 The waterfront typologies again show good overall viability with 33% affordable housing. Indeed, viability is improved compared to the general typologies with the increase in build costs more than ameliorated by the higher values associated with developing here. However the single unit typology (Res 1) which was tested without affordable housing remains unviable.

Specialist older persons housing

5.10 The following table shows the results for the specialist older persons housing scheme (sheltered) on a greenfield, a brownfield and a brownfield waterfront typology. Costs and cashflows are different for this type of housing, compared to 'ordinary' houses or flats. As well as modelling with 33% affordable housing we have, in one instance, modelled a scheme without affordable housing – this is on a general brownfield site which is the type of site such schemes typically come forward.

Table 5.3 Modelling results for the specialist older persons typologies - £ per unit

Ref	Units	Greenfield Residual Value per unit	Brownfield Residual Value per unit	Waterfront Brownfield Residual Value per unit
OP1	50	-£32,100	-£32,200	£25,200
OP1 - without affordable homes	50		£10,300	

5.11 Specialist older persons housing was only viable with 33% affordable housing on the waterfront typology. In other locations viability was negative indicating that 33% affordable housing is not deliverable on such schemes. However, a viable result on a general brownfield typology was produced when affordable housing was removed from the model suggesting that there may be some headroom for a reduced affordable housing contribution.

Delivery of social rented units

5.12 We also looked at the impact on viability of delivering social rent in place of affordable rent. Social rents are almost always lower than affordable rents, giving a reduced transfer value. The results are shown in the table below – note that Res 1, the single unit typology has not been modelled here as it was not viable with affordable rent (and so it is reasonable to assume it would not be viable with social rent).

Table 5.4 Sample results where affordable rented units are switched to social rent - £s per unit

Ref	Units	Brownfield Residual Value per unit	Waterfront Brownfield Residual Value per unit
Res 2	3	-£700	£25,400
Res 3	5	£15,200	£46,800
Res 4	8	£30,100	£66,700
Res 5	12	£35,400	£71,900
Res 6	30	£39,800	£79,100
Res 7	100	£38,500	£77,400

5.13 The results illustrate that changing the type of affordable rented tenure (from affordable rent to social rent) reduces viability. However, case studies Res 3 through to Res 7 remained viable on general brownfield land and in waterfront locations with 33% affordable housing. Res 2 (3 units) was unviable on a general brownfield typology, although marginally so and could likely be ameliorated by a small adjustment to the housing mix or land value to accommodate this.

Increasing build costs to account for higher specification design

5.14 We also reviewed the impact of higher build costs on general brownfield sites, to a standard similar to that of waterfront development and the results are shown in the following table.

Table 5.5 Sensitivity modelling on general brownfield typology – showing the impact of upper quartile build costs - £ per unit

Ref	Units	Brownfield Residual Value per unit
Res 2	3	-£10,600
Res 3	5	£4,600
Res 4	8	£20,400
Res 5	12	£26,500
Res 6	30	£31,000
Res 7	100	£31,400

5.15 Although viability is reduced when build costs are increased to the upper quartile (with no corresponding increase in value), typologies of 5 or more units remained viable with 33% affordable housing. Res 2, the 3-unit typology, however was no longer viable.

Headroom for further policy costs

5.16 Higher carbon reduction standards such as those proposed in the 2023 Future Homes Consultation or through the Publication Local Plan Policy PUBDM20: Energy demand and performance of new buildings (including extensions) have implications for higher costs. The impact assessment for Future Homes (discussed in chapter 4) suggests a figure of £6,000 could be applicable to houses to reach the standard. (Figure is adjusted from the Impact Assessment to account for the larger dwellings in the BA.)

5.17 Where development falls within the catchment area of the Broads SAC and Broadland Ramsar, a mitigation cost will apply for nutrient neutrality and this could be in the region of £3,500 for the areas in which it applies.

5.18 These two figures suggest a possible additional cost to development of between £3,500 and £9,500 per unit if the above circumstances prevail. However, the results in this chapter indicate that the majority of development within the BA is able to absorb these costs. Of the typologies

that were previously viable, the 3-unit typology and the specialist older persons typology on a general brownfield site could struggle to accommodate the costs if providing affordable housing as well, as could the 5-unit typology on a similar site if also built to upper quartile build costs. These results do not take into account that additional value could be generated to schemes by increased house prices at the time Future Homes is adopted.

Review of the residential results

- 5.19** The results of testing viability of the residential typologies identified present a picture of good general viability and ability to deliver policy compliant affordable housing for most residential typologies across the Broads Authority, with headroom in many instances for further policy costs as well as those associated with national policies such as Future Homes.
- 5.20** The 1-unit typology however is not viable, even without affordable housing, and would not be able to make a contribution to affordable housing. This is not unusual for single-unit typologies which are often built non-speculatively for occupation by the household that commissioned the development, or where a small developer/contractor builds at a lower profit margin.
- 5.21** The 3-unit typology on general brownfield sites, whilst viable with affordable housing in the main testing scenario, is weakened where additional costs are applied, although this is not the case for waterfront or greenfield typologies. Again, with the exception of the 3-unit general brownfield typology and the 1-unit typology in all areas, delivery of social rent is viable should this be the preferred affordable rented tenure.
- 5.22** Specialist older persons housing was only viable with affordable housing in the waterfront area.
- 5.23** The good viability achieved on most development typologies indicates headroom to respond to market changes, higher development costs or land values if applicable over the plan period.

Chapter 6 Non-residential development

- 6.1** This chapter summarises the impact of the publication version of the Local Plan policies on the viability of non-residential development. There are few Local Plan policies that directly affect the viability of non-residential development however the BA wants to understand the impact of those policies which do imply additional non-residential standards.
- 6.2** A review of recent local plan and/or CIL viability studies for the local authorities that comprise the Broads Authority demonstrate that non-residential typologies generally perform weakly, in viability terms, when assessed using a Residual Land Value approach. For instance:
- **Great Yarmouth Local Plan Viability Assessment** (HDH 2023) (para 12.91): finds that employment uses are generally “not being brought forward to on a speculative basis” and instead the limited amount of office and industrial development that is being developed tended to be as a user-led scheme that fit the requirements of that specific developer, rather than for investment purposes. Retail warehouses and supermarkets were demonstrated to be viable.
 - **East Suffolk CIL Review Study** (Aspinal Verdi 2022) (paras 10.13 & 10.21): found office and industrial development to be “considerably unviable in the District” and “currently unviable” respectively. Convenience retail was demonstrated as being viable, whereas comparison retail was judged to be unviable.
 - **North Norfolk District Council Plan Wide Viability Assessment** (NCS 2022) (para 1.2): demonstrated that “only food retail development showed significant viability” and that “[a]ll of the remaining commercial use class appraisals indicate negative viability though this does not mean that this type of development is not deliverable”.
 - **Greater Norwich Development Partnership**: do not appear to consider non-residential typologies in any of the viability assessments that have been submitted as part of the Greater Norwich Local Plan which was submitted for examination on 30th July 2021.
- 6.3** The clear conclusion from the reviewed work was that only retail development was consistently viable on a speculative basis but that development was still likely to come forward to meet occupiers’ commercial needs.
- 6.4** From the policy review of the publication version of the Local Plan set out in Chapter 2, the majority of proposed policies are not considered to significantly add to the development costs for non-residential uses in the plan period. The following policies that may have some impact on the viability of non-residential development are:
- **Policy PUBDM16: Biodiversity Net Gain** all type of development is expected to achieve a minimum of 20% Biodiversity Net Gain (BNG). A Government Impact Assessment undertaken by DEFRA (2019) in Table 15 estimates that a 10% BNG is estimated to represent a cost of £14,334 per hectare. Further, para 6.11.2 of the same impact

assessment estimates that the impact of increasing the net gain to 20% increases the cost to developers by 19%. Therefore, it is assumed that a 20% BNG could represent a cost of £17,058 per hectare. Compared to the total development costs of non-residential development as a whole, this cost is relatively modest.

- **Policy PUBDM55: Non-residential development and BREEAM** non-residential development above 250 sqm must achieve a minimum of BREEAM Very Good. Additionally, non-residential development above 250 sqm must also achieve 3 credits in BREEAM category Wat 01 and those over 1,000 sqm must achieve 5 credits. Historically, BREEAM has been commonly used to categorise non-residential building standards, with five categories – Pass; Good; Very Good; Excellent and Outstanding. Work undertaken by BRE (Building Research Establishment, 2016, The value of BREEAM) suggests that the uplift over base construction costs varies between 0.1% and 0.2% for BREEAM Very Good.

- 6.5** Generally, it is considered that the requirements of these policies are not unreasonable for non-residential development and that the order of magnitude of the potential cost uplift outlined above would not unduly jeopardise development. Indeed, anecdotal evidence indicates that potential occupiers are increasingly requesting higher standard for potential premises to meet their own Environmental Social and Governance (ESG) objectives meaning that, given the magnitude of the costs, many developers are adopting such standards regardless.
- 6.6** It is important to note that the analysis considers development that might be built for subsequent sale or rent to a commercial tenant. However, there will also be development that is undertaken for specific commercial operators, either as owners or pre-lets. In these circumstances the economics of the development relate to the profitability of the enterprise accommodated within the buildings rather than the market value of the buildings. Therefore, it should be noted that while the testing suggests that all types of development are not viable, they may still be brought forward for individual occupiers to meet their specific requirements. In particular, if the required return is reduced to the level of a contractor return, then unviable sites may be marginal or (marginally) positive.

Summary for non-residential testing

- 6.7** Non-residential development has not been viability tested within this study for the following reasons. Firstly, the BA does not expect a significant amount of non-residential development within the Broads area over the plan period; and that the local plan's 'deliverability' is not reliant on such development. Secondly, the policies that the Authority has included that are directly relevant to these types of developments only represent modest costs. Given the weak viability for commercial uses that has been identified in similar viability studies conducted recently it is unlikely that these policies, given the magnitude of the costs, would have a significant impact on the overall delivery of the Local Plan should they be included or not.

Chapter 7 Summary and conclusions

7.1 To inform the Regulation 19 Publication Local Plan we have modelled the viability of a range of typologies across the Broads Authority. These are representative of the types of development anticipated to come forward during the plan period and include costs attributed to the draft policies. The testing assumptions used have been derived from published sources and consulted upon with the development industry and other key stakeholders. The implications drawn from the results are discussed below.

Policy Implications

7.2 An affordable contribution of at least 33% is achievable on most typologies across the Broads Authority, including on those of fewer than 10 dwellings. The clear exceptions to this in viability terms are developments of 1-unit on any site type and older persons housing apart from on waterfront sites. For the typologies of 3-units a contribution is realistic on waterfront sites and greenfield sites – on general (inland) brownfield sites collection is still feasible but could be compromised if there are additional development cost pressures such as higher environmental costs. As some results are positive, the authority could still ask for a contribution on these sites but may then have to assess a viable contribution on a site-by-site basis.

7.3 Potential national increases in development standards in respect of carbon reduction (Future Homes and Future Buildings) would reduce residual values but does not change our conclusion.

7.4 As well as affordable housing, the testing included allowances for policies in the Publication Local Plan including:

- Biodiversity Net Gain at 20%
- Accessibility to Building Regulations M4(2) standard on every dwelling
- Accessibility to Building Regulations M4(3) standard on 10% of affordable homes
- Self and custom build housing at 5% on sites of 100 dwellings or more.

The results of the viability testing show these policies to be achievable.

7.5 For non residential development, there is a limited number of policies that directly impact on development viability. Those that do include BREEAM and Biodiversity Net Gain. Whilst this does increase the cost, the impact of these policies is minimal and would not, either on their own or in combination, effect delivery of these forms of development.

List of appendices

List of appendices to be found in Technical Appendices Report

Appendix I – National policy and guidance

Appendix II – Notes from the developer workshop

Appendix III – Sample house price data

Appendix IV – Building and construction costs

Appendix V – Results sheets

Appendix VI – Sample summary appraisals



Report for the Broads Authority

Local Plan Viability Assessment

Technical Appendices – October 2024

Document control sheet	
Project name	Broads Authority Local Plan
Project reference	Viability Assessment
Report title	Broads Authority Local Plan Viability Assessment – Technical Appendices
Doc ref	Final report
Date	October 2024
Prepared by	Laura Easton, Tom Marshall
Reviewed by	Lin Cousins
Quality statement	In preparing this report, the authors have followed national and professional standards, acted with objectivity, impartially, without interference and with reference to appropriate available sources of information. No performance-related or contingent fees have been agreed and there is no known conflict of interest in advising the client group.
Use of this report	<p>This report is not a formal land valuation or scheme appraisal. It has been prepared using the Three Dragons toolkit and is based on local level data supplied by the Broads Authority, consultant team inputs and quoted published data sources. The toolkit provides a review of the development economics of illustrative schemes and the results depend on the data inputs provided. This analysis should not be used for individual scheme appraisal.</p> <p>No responsibility whatsoever is accepted to any third party who may seek to rely on the content of the report unless previously agreed.</p>
Cover photo	Reedham riverside (Three Dragons)

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Appendix I - National policy and guidance

National policy context

- i. **National framework** - The National Planning Policy Framework (NPPF) recognises the importance of positive and aspirational planning but states that this should be done 'in a way that is aspirational but deliverable'.(Para 16)
- ii. The NPPF advises that cumulative effects of policy should not combine to render plans unviable:
'Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.'(Para 34)
- iii. The government has signalled its desire to simplify the planning process, including development contributions. The NPPF advises that:
'All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available.' (Para 58)
- iv. In terms of affordable homes the government has reiterated previous policy on affordable homes thresholds and a desire to increase affordable home products that can potentially lead to home ownership:
'Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount.' (Para 65)
'Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.' (Para 66)
- v. With regard to non-residential development, the NPPF states that local planning authorities should:
'set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth...local policies for economic development and regeneration...seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment...be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.' (Para 86)

- vi. However, the NPPF does not state that all sites must be viable now in order to appear in the plan. Instead, the NPPF is concerned to ensure that the bulk of the development is not rendered unviable by unrealistic policy costs and that overall, Local Plan policies should not undermine the deliverability of the plan (Para 34). It is important to recognise that economic viability will be subject to economic and market variations over the local plan timescale. In a free market, where development is largely undertaken by the private sector, the local planning authority can seek to provide suitable sites to meet the needs of sustainable development. It is not within the local planning authority's control to ensure delivery actually takes place; this will depend on the willingness of a developer to invest and a landowner to release the land. So, in considering whether a site is deliverable now or developable in the future, we have taken account of the local context to help shape our viability assumptions.
- vii. **Written Ministerial Statements - Affordable Homes Update** (24 May 2021) is specifically referenced in NPPF and sets out the Government's plans for the delivery of First Homes and the new model for Shared Ownership. First Homes criteria includes the requirement for a discount in perpetuity of at least 30% against market value to a maximum discounted price of £250,000 (£420,000 in Greater London). A minimum of 25% of all affordable housing units secured through developer contributions should be First Homes. First Homes are an affordable home ownership product and count towards the NPPF requirement that 10% of all homes are affordable home ownership. First Homes are exempt from CIL.
- viii. **Written Ministerial Statements - Local Energy Efficiency Standards Update** (13 December 2023) recognises that for a number of years, the plans of some local authorities have sought to go further than national standards for energy efficiency. The WMS states that the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations unless they have a well-reasoned and robustly costed rationale that ensures development remains viable and that any additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate calculated using a specified version of the Standard Assessment Procedure.
- ix. **Planning Practice Guidance** - Planning Practice Guidance (PPG) provides further detail about how the NPPF should be applied. PPG contains general principles for understanding viability (also relevant to CIL viability testing). The approach taken reflects the latest version of PPG. In order to understand viability, a realistic understanding of the costs and the value of development is required and direct engagement with development sector may be helpful (Paragraph: 010 Reference ID: 10-010-20180724). Evidence should be proportionate to ensure plans are underpinned by a broad understanding of viability, with further detail for strategic sites that provide a significant proportion of planned supply (Paragraph: 005 Reference ID: 10-004-20180724).
- x. All development costs should be taken into account, including within setting of benchmark land values, in particular para 014 within the PPG Viability section states that:
 - 'Costs include:
 - build costs based on appropriate data, for example that of the Building Cost Information Service

- abnormal costs, including those associated with treatment for contaminated sites or listed buildings, or costs associated with brownfield, phased or complex sites. These costs should be taken into account when defining benchmark land value
 - site-specific infrastructure costs, which might include access roads, sustainable drainage systems, green infrastructure, connection to utilities and decentralised energy. These costs should be taken into account when defining benchmark land value
 - the total cost of all relevant policy requirements including contributions towards affordable housing and infrastructure, Community Infrastructure Levy charges, biodiversity net gain (as required by Schedule 7A of the Town and Country Planning Act), and any other relevant policies or standards. These costs should be taken into account when defining benchmark land value
 - general finance costs including those incurred through loans
 - professional, project management, sales, marketing and legal costs incorporating organisational overheads associated with the site. Any professional site fees should also be taken into account when defining benchmark land value
 - explicit reference to project contingency costs should be included in circumstances where scheme specific assessment is deemed necessary, with a justification for contingency relative to project risk and developers return.'
- xi. Land values (Paragraph: 013 Reference ID: 10-013-20190509 and 014 Reference ID: 10-014-20190509) should be defined using a benchmark land value that is established on the basis of Existing Use Value plus a premium for the landowner. The premium should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land. The benchmark should reflect the implications of abnormal costs, site specific infrastructure and fees. It can be informed by market evidence including current costs and values but that this should be based on development that is compliant with policies, where evidence is not available adjustments should be made to reflect policy compliance.
- xii. PPG states that developer return should be 15 - 20% of gross development value and that a lower figure may be more appropriate for affordable homes delivery (Paragraph: 018 Reference ID: 10-018-20190509)
- xiii. **Other guidance on viability testing for development** - Guidance has been published to assist practitioners in undertaking viability studies for policy making purposes - "*Viability Testing Local Plans - Advice for planning practitioners*". (The guide was published in June 2012 and is the work of the Local Housing Delivery Group, chaired by Sir John Harman, which is a cross-industry group, supported by the Local Government Association and the Home Builders Federation.) The foreword to the Advice for planning practitioners includes support from DHCLG, the LGA, the HBF, PINS and POS. Within the guidance, PINS and the POS state that:
- 'The Planning Inspectorate and Planning Officers Society welcome this advice on viability testing of Local Plans. The use of this approach will help enable local authorities to meet their obligations under NPPF when their plan is examined'*

- xiv. The approach to viability testing adopted for this study follows the principles set out in the Advice. The Advice re-iterates that:

'The approach to assessing plan viability should recognise that it can only provide high level assurance'

- xv. The Advice also comments on how viability testing should deal with potential future changes in market conditions and other costs and values and states that:

'The most straightforward way to assess plan policies for the first five years is to work on the basis of current costs and values'. (page 26)

- xvi. But that:

'The one exception to the use of current costs and current values should be recognition of significant national regulatory changes to be implemented.....' (page 26)

Principles of viability testing

- xvii. The Advice for planning practitioners summarises viability as follows:

'An individual development can be said to be viable if, after taking account of all costs, including central and local government policy and regulatory costs and the cost and availability of development finance, the scheme provides a competitive return to the developer to ensure that development takes place and generates a land value sufficient to persuade the land owner to sell the land for the development proposed. If these conditions are not met, a scheme will not be delivered.' (page 14)

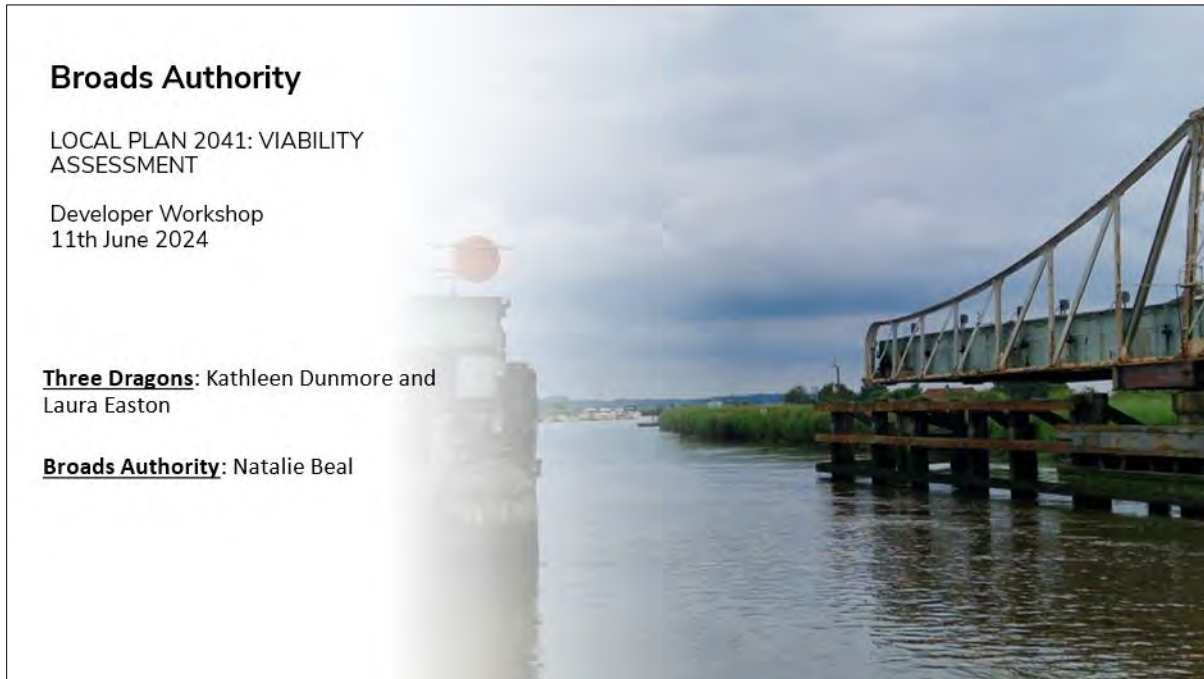
- xviii. Reflecting this definition of viability, and as specifically recommended by the Advice for planning practitioners, we have adopted a residual value approach to our analysis. Residual value is the value of the completed development (known as the Gross Development Value or GDV) less the costs of undertaking the development. The residual value is then available to pay for the land. The value of the scheme includes both the value of the market homes and affordable homes (and other non-residential values). Scheme costs include the costs of building the development, plus professional fees, scheme finance and a return to the developer. Scheme costs also include planning obligations (including affordable homes, direct s106 costs) and the greater the planning obligations, the less will be the residual value.

- xix. The residual value of a scheme is then compared with a benchmark land value. If the residual value is less than the benchmark value, then the scheme is less likely to be brought forward for development and is considered unviable for testing purposes. If the residual value exceeds the benchmark, then it can be considered viable in terms of policy testing.

- xx. PPG paragraph 012 - 015 sets out that benchmark land values should be based on the current use value of a site plus an appropriate site premium in most cases. The principle of this approach is that a landowner should receive at least the value of the land in its 'pre-permission' use, which would normally be lost when bringing forward land for development. The benchmark land values used in this study are based on the principle of 'Existing Use Value Plus' which is considered further in other parts of this report.

- xxi. Note the approach to Local Plan level viability (or CIL) assessment does not require all sites in the plan to be viable. The Harman Report says that a site typologies approach (i.e. assessing a range of example development sites likely to come forward) to understanding plan viability is sensible, a view echoed in CIL guidance. Viability '*...is to provide high level assurance that the policies with the plan are set in a way that is compatible with the likely economic viability of development needed to deliver the plan*'.

Appendix II - Notes from the developer workshop



Present

Natalie Beal The Broads Authority Planning Dept
Kathleen Dunmore Three Dragons
Laura Easton Three Dragons
Stone Planning and Keystone Development
Badger Building

Apologies

FW Properties
Walsingham Plan
Greene King
Rural Solutions

1. Introduction to the session

The chair, Kathleen Dunmore from Three Dragons welcomed everyone to the meeting and explained that this was an opportunity to input into key assumptions underlying the viability appraisal which would provide supporting evidence for the emerging Broads Authority local plan.

Participants were encouraged to make comments at this meeting, by email or in writing or by telephone afterwards. They were informed that the meeting would be recorded and copies of the notes sent to everyone who had indicated an interest in attending.

The structure of the session is set out in the slide below.

Welcome to Today's Session

- **Introductions and housekeeping**
- **Local Plan Update**
- **Overview of Methodology**
- **Presentation of Initial Testing Assumptions**
- **Opportunity for Views and Questions**

2. Review of Broads Authority Local Plan

Local Plan Review

- Why the Broads Authority is reviewing its Local Plan
- Issues to address
- Steps taken so far
 - Housing needs
 - Call for sites
 - Issues and Options
- Next steps and timetable



The Local Plan for the Broads: Review
Plan period 2021 to 2041
Preferred Options consultation



Maps of the Broads Authority



Natalie Beal from the Broads Authority explained that the current local plan has been in place since 2019. An issues and options paper was prepared in 2022 and the regulation 18 draft plan was released for consultation in March 2024. Over 700 responses have been received and the Authority is now reviewing the adopted Local Plan.

The Broads Authority has carried out two calls for sites but no suitable sites have come forward. There is a need for 358 dwellings over the Plan period with some 271 dwellings to come forward through the Utilities site allocation at East Norwich.

The Authority intends to consult on its publication plan in December 2024 and needs to submit it for examination by June 2025 at the latest so as to meet the pre-LURA (Levelling Up & Regeneration Act) transition dates and be adopted by the end of 2026.

3. Approach to testing

<p>Approach to viability testing</p> <ul style="list-style-type: none"> • Residual value approach • NPPF and PPG compliant • Harman, Viability testing local plans • Based on notional typologies 	<p>Total development value</p> <p><i>Minus</i></p> <p>Development costs (incl. build costs, planning obligations and return to developer, interest/cashflow where relevant, sales costs and legal fees)</p> <p>=</p> <p>residual value</p> <p><i>Minus</i></p> <p>Benchmark land value</p> <p><i>If result positive, development is viable</i></p>
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The viability testing will be based on a residual value approach as set out in PPG.

4. Typologies

Residential Typologies		
Suggested typologies	Market housing mix	Densities
1 unit	1 x 3 bed detached	
3 units	3 x 3 bed detached	15dph
5 units	Equal split of 2/3/4bed	15 dph
8 units	Equal split of 2/3/4bed	20 dph
12 units	Equal split of 2/3/4bed	20 dph
50 units	Equal split of 2/3/4bed	25 dph
200 units	10% 1 beds and equal split of 2/3/4bed	30 dph

Laura Easton set out the proposed residential typologies for testing, highlighting that most development in the Broads consists of small sites of under 10 units.

Discussion concluded that the typology list was broadly reasonable. As indicated in the proposed typology list, density is lower on smaller sites than on larger sites and smaller sites are more likely to include bungalows.

A site of 15 to 20 units at Gillingham half a mile from the Broads is being built out and can provide information about the mix density and size of units.

Sites can take a long time to build out due to issues such as prohibitive costs of piling or because small businesses have other competing priorities.

5. Residential values

Housing Market Values

Very little new build in last few years – so very little evidence

Looked at last viability study and indexed to today's values (Nov 2018 to Jan 24) – 35% increase

Land Registry new build – hard to be certain of locations

Checked against properties on the market today

Are these values realistic – across the Broads?

House - £3,900 per sqm

House – waterfront £5,070 per sqm

On the market today -

4B det £425,000 - £735,000

3B semi £235,000 - £300,000



MARKET VALUES –BROADS AUTHORITY

Dwelling	Market value	Market value - waterfront
2 bed house – 80 sqm	£312,000	£405,600
3 bed house – 110 sqm	£429,000	£557,700
4 bed house – 140 sqm	£546,000	£709,800
4 / 5 bed house – 190 sqm	£741,000	£963,300

Laura Easton presented suggested housing market values. These were based on a combination of the values in the previous viability study uplifted by inflation, Information from Rightmove and other house price websites about prices of properties currently on sale in the Broads and Land Registry data on recent newbuilds.

It was agreed that this methodology was broadly reasonable and that as a mean of the Broads, the values were about right. There are higher value areas in more attractive locations with proximity to the waterfront and the proposed uplift seemed about right, although not all waterfront locations are attractive and are thus less likely they are to qualify as a premium house price area

Prices are often location specific in practice and vary across the Broads, participants referred to two developments quite close to each other where house prices for similar properties were 500K (Romsey Road) and 900K (Riverside).

Houses are not selling as fast as they were but are selling. The lower end of the market is buoyant but the market for properties priced at £500,000 and over is slower.

6. Benchmark Land value

Benchmark Land Value

Benchmark land value should:

- be based upon existing use value
- allow for a premium to landowners (including equity resulting from those building their own homes)
- reflect the implications of abnormal costs; site-specific infrastructure costs; and professional site fees
PPG paragraph 14

Benchmark Land Value – enough to enable transaction but not the same as best price. Land will transact above this value

“Under no circumstances will the price paid for land be a relevant justification for failing to accord with relevant policies in the plan.”
PPG paragraphs 6, 11, 14 and 18

Benchmark Land Value

Broads Authority Value per gross ha					Greenfield – 15 x agricultural value Brownfield - EUV +20%
Single plot (0.05 ha)	Greenfield sites (range £0.2m - £0.4m)	Sites with existing brownfield use / Edge of Norwich and waterfront	Sites with existing brownfield use /elsewhere	Rural Exception Sites	
£50k	£0.30m	£0.75m	£0.40m	10K per plot	

Benchmark land values are taken from a variety of sources, including existing use values from DLUHC, current sales, and values used in viability appraisals across the 6 local authorities that make up the Broads. It was agreed that they were broadly reasonable but land values would be influenced by exceptional build costs such as remediation - particularly likely on edge of Norwich sites. Piling costs to a depth of 16-18 metres also need to come off land value (examples of piling costs were requested).

If the single plot site has planning permission then the cost of the land would be closer to £100k.

7. Dwelling sizes

Residential Testing – dwelling sizes

House type description	Affordable sqm	Market sq m
1 bedroom flat	50 (2p)	n/a in Broads
2 bedroom bungalow or flat	70 (4p)	80
2 bedroom house	79 (4p)	80
3 bedroom house	93 (5p)	110
4 bedroom house	97 (5p)	140
4/5 bed detached house		190
Single plots or waterfront only?		
An allowance of 10% of floor area will be added to the flats for circulation and common areas (20% for sheltered)		
Units are compliant with Nationally Described Space Standards		

The dwelling sizes quoted were considered broadly realistic with the exception that 110 square metres was considered too large for a three bed house. It was noted that dwellings are often quite large in the broads and Badger Homes to send some examples – other examples were also requested. **Post meeting suggestion - would a 3-bed unit of 95 square metres be more realistic?.**

8. Affordable housing

Affordable Housing Dwelling Mix – Mixed Tenure Sites

	Sqm	Rented (70%)	First Homes (25%)	Shared ownership (5%)
1 bed	50	20%		
2 bed	79	40%	50%	50%
3 bed	93	30%	50%	50%
4 bed	97	10%		

Current policies range from 15% to 35%
 Our starting point 33% on all sites
 On Sites less than 10 dwellings potential for commuted sum (but same impact on viability)
 RES – start at 100% affordable

Do the targets in the table look realistic as a starting point?

- Mix encompasses differing areas – is it deliverable?
- We will test alternatives
- We will talk to RPs & enablers separately – but are there any particular issues to raise now?

Currently affordable housing is required on sites over 10 dwellings in the Broads and commuted sums payable on sites of 6-9 dwellings. There has been no direct affordable housing delivery in the Broads Authority area in recent years but some commuted sum payments. The emerging plan will give consideration to whether affordable housing should be sought on sites of 1-5 dwellings. From a viability perspective the payment should be the same whether the affordable homes are on-site or as a commuted sum. In either case it is necessary to calculate a realistic mix of affordable housing in order to arrive at the appropriate commuted sum.

Some discussion about whether First Homes are required in the Broads. They are not appropriate for rural exception sites but schemes within the Broads which are not classified as rural exceptions will be expected to provide First Homes, unless an evidence backed policy case can be made for not developing these.

Badger Homes has set up an inhouse registered provider to provide affordable housing. Contact to be provided to be included in the RP consultation process.

9. Costs

Build Cost (BCIS mean 5yr Norfolk)		
Type	Broads Authority	
Flats (1-2 storey)	£1,605	Per sqm
One-off houses - detached	£2,678	Per sqm
2-5 houses (general)	£1,513	Per sqm
6-9 houses (general)	£1,441	Per sqm
10+ houses (general)	£1,369	Per sqm
100+ houses (general)	£1,282	Per sqm
Bungalows	£1,638	Per sqm
Sheltered flats	£1,818	Per sqm
Plot costs and site infrastructure	15%	Up to 100 dwellings
	20%	100+ dwellings
Part L	3.9%	Per unit
Accessibility – Part M4	£1,400	Per dwelling to meet M4(2)
Delivery Rates – any comments?		

Other costs		
Professional fees	6-10%	Of build costs
Finance	7%	Of development costs
Marketing fees	3%	Of Market GDV
Developer return	17.5%	Of GDV
Contractor return (for affordable)	6%	
Agents & Legal	1.75%	
SDLT	Per HMRC figures	
S106	RAMS	Going rate – all dwellings
	£2,000 £10,000 - £20,000	Per dwelling, sites 10 + Sites over 100 units
Future Homes Standard (sensitivity)	£4,000 - £6,000	Per house (lower for flats)
Electric Vehicle Charging	£865	Per unit
Biodiversity net gain	£995 - £1,185	Per unit – 10-20% (Brownfield) Central scenario from Govt impact assessment

The build costs proposed looked broadly reasonable - more information is requested about the costs of pile foundations

One-offs such as Passivhaus or particular designs will carry additional costs but this may be offset by premium price: an uplift of 10% in both cases was suggested but would need to be verified.

Sales rates are slower than national averages as builders are unlikely to sell off plan. First sale typically 18 months from commencement on site and could be longer if there are complicated groundworks.

Local developers and the Broads Authority, like other affected LPAs, is still working out how to cope with nutrient neutrality and this will be an additional sum in some areas of the Broads. **(Post workshop note** – a figure of £3,500 has been suggested as appropriate by one of the district authorities.) Natalie advised developers to look at Norfolk Environmental Credits and check specific schemes with Natural England. She will also provide contact for Three Dragons at Broadland Council.

10. Non-residential development

Non-residential development

- What types of non-residential should be modelled?
- Relevance of location?
- Applicability of BREEAM standard?



Limited activity at present, Greene King is developing leisure site in Station Road, Hoveton (waterside facilities / hotel / dining). Paddle board sites are popular.

11. Next steps and contacts for comments

NEXT STEPS

- Workshop notes/slides to be circulated – another opportunity for input to the study
- Follow up interviews with RPs
- Follow up interviews with other stakeholders if appropriate, or if need for confidential discussion
- Initial testing undertaken
- Presentation of findings to BA
- Sensitivity testing
- Reporting

(slide with contact details removed)

Please contact the Three Dragons team on these email addresses if you have any information you would like to feed in to the viability process, evidenced where possible. Any identifying information will remain confidential.

Comments and information also most welcome from those who were unable to attend the meeting.

Thank you everyone for your participation

Appendix III – Sample house price data

Sample (from 1,146 record) house price data – Norfolk – Indexed

Date	Index at Transaction date	Index at latest date	Indexed Sales value	postcode	Indexed Sales value per sqm	FLSP	price_paid	property_type	new_build	estate_type	locality
May 2019	123.66	155.7	£324,847	NR12 7DE	£3,867	84	258000	S	Y	F	CROSTWICK
May 2019	123.66	155.7	£346,252	NR12 7DE	£3,570	97	275000	S	Y	F	CROSTWICK
February 2020	125.58	150.1	£298,814	NR12 7DE	£3,557	84	250000	T	Y	F	CROSTWICK
September 2021	139.7	150.1	£204,145	NR12 7DE	£3,293	62	190000	T	Y	F	CROSTWICK
November 2020	130.18	150.1	£207,543	NR12 7DE	£3,193	65	180000	T	Y	F	CROSTWICK
October 2021	139.7	150.1	£201,458	NR12 7DE	£3,198	63	187500	T	Y	F	CROSTWICK
September 2019	123.71	150.1	£266,931	NR12 7DE	£4,171	64	220000	T	Y	F	CROSTWICK
May 2019	123.64	150.1	£267,082	NR12 7DE	£4,239	63	220000	T	Y	F	CROSTWICK
November 2020	130.18	150.1	£207,543	NR12 7DE	£3,193	65	180000	T	Y	F	CROSTWICK
February 2021	131.6	150.1	£205,304	NR12 7DE	£3,366	61	180000	T	Y	F	CROSTWICK
December 2020	128.97	150.1	£209,491	NR12 7DE	£3,223	65	180000	T	Y	F	CROSTWICK
November 2021	140.2	150.1	£192,710	NR12 7DE	£2,965	65	180000	T	Y	F	CROSTWICK
April 2019	122.82	150.1	£274,976	NR12 7DE	£4,230	65	225000	T	Y	F	CROSTWICK
December 2020	128.97	150.1	£209,491	NR12 7DE	£3,379	62	180000	T	Y	F	CROSTWICK
September 2019	123.71	150.1	£256,617	NR12 7DE	£4,139	62	211500	T	Y	F	CROSTWICK
September 2020	131.02	150.1	£206,213	NR12 7DE	£3,173	65	180000	T	Y	F	CROSTWICK
March 2021	132.3	150.1	£215,563	NR12 7DE	£3,534	61	190000	T	Y	F	CROSTWICK
June 2019	124.53	154.8	£696,121	NR12 8FE	£3,446	202	560000	D	Y	F	WROXHAM
January 2019	127.76	155.7	£365,601	NR12 8FE	£3,584	102	299995	S	Y	F	WROXHAM
September 2021	136.3	154.4	£455,950	NR12 8QB	£3,965	115	402500	D	Y	F	HOVETON
September 2020	137.12	154.4	£444,778	NR12 8QB	£3,868	115	395000	D	Y	F	HOVETON

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Date	Index at Transaction date	Index at latest date	Indexed Sales value	postcode	Indexed Sales value per sqm	FLSP	price_paid	property_type	new_build	estate_type	locality
September 2020	139.14	156.3	£325,765	NR12 8QB	£4,654	70	290000	S	Y	F	HOVETON
November 2020	143.36	156.3	£272,566	NR12 8QB	£3,839	71	250000	S	Y	F	HOVETON
March 2021	137.7	156.3	£334,847	NR12 8QB	£4,784	70	295000	S	Y	F	HOVETON
December 2020	142.26	156.3	£296,647	NR12 8QB	£3,532	84	270000	S	Y	F	HOVETON
December 2020	139.45	154.4	£553,603	NR12 8QB	£3,376	164	500000	D	Y	F	HOVETON
November 2020	140.62	154.4	£439,198	NR12 8QB	£3,819	115	400000	D	Y	F	HOVETON
January 2021	137.7	154.4	£549,426	NR12 8QB	£3,350	164	490000	D	Y	F	HOVETON
November 2020	143.36	156.3	£321,627	NR12 8QB	£3,496	92	295000	S	Y	F	HOVETON
January 2021	139.9	156.3	£325,113	NR12 8QB	£3,737	87	291000	S	Y	F	HOVETON
March 2021	136.7	154.4	£534,809	NR12 8QB	£3,495	153	473500	D	Y	F	HOVETON
June 2021	142.7	154.4	£524,765	NR12 8QB	£3,430	153	485000	D	Y	F	HOVETON
January 2021	137.7	154.4	£616,703	NR12 8QB	£3,606	171	550000	D	Y	F	HOVETON
December 2020	139.45	154.4	£542,531	NR12 8QB	£3,308	164	490000	D	Y	F	HOVETON
April 2021	137	154.4	£371,856	NR12 9AX	£3,262	114	329950	D	Y	F	STALHAM
April 2021	137	154.4	£394,396	NR12 9AX	£3,259	121	349950	D	Y	F	STALHAM
April 2021	137	154.4	£377,491	NR12 9AX	£3,120	121	334950	D	Y	F	STALHAM
April 2021	137	154.4	£400,031	NR12 9FY	£4,211	95	354950	D	Y	F	STALHAM
May 2021	139	154.4	£399,829	NR12 9FY	£4,209	95	359950	D	Y	F	STALHAM
May 2021	139	154.4	£355,398	NR12 9FY	£3,118	114	319950	D	Y	F	STALHAM
May 2021	139	154.4	£388,721	NR12 9FY	£3,213	121	349950	D	Y	F	STALHAM
July 2021	140.8	154.4	£400,201	NR12 9FY	£4,213	95	364950	D	Y	F	STALHAM
August 2021	137.3	154.4	£382,289	NR12 9FY	£2,731	140	339950	D	Y	F	STALHAM
July 2021	140.8	154.4	£328,922	NR12 9FY	£4,272	77	299950	D	Y	F	STALHAM
November 2021	145.8	154.4	£370,592	NR12 9FY	£3,901	95	349950	D	Y	F	STALHAM
March 2022	152.4	137.7	£171,628	NR12 9FZ	£3,178	54	189950	F	Y	L	STALHAM
November 2021	143.6	137.7	£164,885	NR12 9FZ	£3,747	44	171950	F	Y	L	STALHAM
November 2021	143.6	137.7	£161,050	NR12 9FZ	£3,660	44	167950	F	Y	L	STALHAM

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Date	Index at Transaction date	Index at latest date	Indexed Sales value	postcode	Indexed Sales value per sqm	FLSP	price_paid	property_type	new_build	estate_type	locality
December 2021	146	137.7	£219,235	NR12 9FZ	£3,322	66	232450	F	Y	L	STALHAM
June 2022	153.2	137.7	£220,167	NR12 9FZ	£3,016	73	244950	F	Y	L	STALHAM
December 2021	146	137.7	£167,362	NR12 9FZ	£3,638	46	177450	F	Y	L	STALHAM
December 2021	146	137.7	£167,362	NR12 9FZ	£3,719	45	177450	F	Y	L	STALHAM
December 2021	146	137.7	£179,151	NR12 9FZ	£3,445	52	189950	F	Y	L	STALHAM
May 2022	153.7	137.7	£223,483	NR12 9FZ	£3,193	70	249450	F	Y	L	STALHAM
November 2021	143.6	137.7	£232,489	NR12 9FZ	£3,274	71	242450	F	Y	L	STALHAM
November 2022	156.8	137.7	£223,894	NR12 9FZ	£2,834	79	254950	F	Y	L	STALHAM
December 2021	146	137.7	£254,132	NR12 9FZ	£3,217	79	269450	F	Y	L	STALHAM
March 2022	152.4	137.7	£221,323	NR12 9FZ	£3,032	73	244950	F	Y	L	STALHAM
January 2022	150.5	137.7	£263,002	NR12 9FZ	£2,711	97	287450	F	Y	L	STALHAM
December 2021	140.9	154.8	£335,083	NR13 3DN	£4,654	72	304995	D	Y	F	ACLE
November 2022	154.9	154.8	£524,661	NR13 3DN	£3,105	169	525000	D	Y	F	ACLE
December 2021	140.9	154.8	£329,590	NR13 3DN	£3,329	99	299995	D	Y	F	ACLE
July 2022	151.3	154.8	£475,706	NR13 3DN	£2,815	169	464950	D	Y	F	ACLE
December 2022	154.2	154.8	£269,043	NR13 3DN	£3,449	78	268000	D	Y	F	ACLE
July 2023	146.1	154.8	£381,437	NR13 3DN	£4,058	94	360000	D	Y	F	ACLE
January 2023	154.2	154.8	£411,595	NR13 3DN	£3,374	122	410000	D	Y	F	ACLE
March 2023	151.7	154.8	£319,396	NR13 3DN	£3,671	87	313000	D	Y	F	ACLE
February 2023	153.1	154.8	£414,553	NR13 3DN	£3,398	122	410000	D	Y	F	ACLE
March 2023	151.7	154.8	£255,109	NR13 3DN	£3,313	77	250000	D	Y	F	ACLE
January 2023	154.2	154.8	£266,031	NR13 3DN	£3,411	78	265000	D	Y	F	ACLE
March 2023	151.7	154.8	£443,889	NR13 3DN	£3,468	128	435000	D	Y	F	ACLE
February 2023	153.1	154.8	£424,664	NR13 3DN	£3,318	128	420000	D	Y	F	ACLE
March 2023	151.7	154.8	£346,948	NR13 3DN	£3,691	94	340000	D	Y	F	ACLE
February 2023	153.1	154.8	£328,609	NR13 3DN	£3,496	94	325000	D	Y	F	ACLE
March 2023	151.7	154.8	£448,991	NR13 3DN	£3,508	128	440000	D	Y	F	ACLE

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September 2021	138.5	154.8	£307,359	NR13 3DT	£4,269	72	274995	D	Y	F	ACLE
February 2022	148	155.7	£260,897	NR13 3DT	£3,433	76	247995	S	Y	F	ACLE
September 2021	138.5	154.8	£307,359	NR13 3DT	£4,269	72	274995	D	Y	F	ACLE
December 2021	143	155.7	£270,020	NR13 3DT	£3,553	76	247995	S	Y	F	ACLE
September 2021	138.5	154.8	£329,713	NR13 3DT	£3,790	87	294995	D	Y	F	ACLE
September 2021	138.5	154.8	£318,536	NR13 3DT	£3,579	89	284995	D	Y	F	ACLE
September 2021	138.5	154.8	£318,536	NR13 3DT	£3,579	89	284995	D	Y	F	ACLE
March 2022	147.2	154.8	£262,908	NR13 3EF	£2,954	89	250000	D	Y	F	ACLE
July 2022	151.3	154.8	£352,976	NR13 3EF	£3,238	109	344995	D	Y	F	ACLE
September 2022	155	154.8	£354,537	NR13 3EF	£3,253	109	354995	D	Y	F	ACLE
March 2022	147.2	154.8	£289,193	NR13 3EF	£4,017	72	274995	D	Y	F	ACLE
March 2022	148.8	155.7	£209,274	NR13 3EF	£2,683	78	200000	S	Y	F	ACLE
March 2022	147.2	154.8	£273,424	NR13 3EF	£3,072	89	260000	D	Y	F	ACLE
March 2022	148.8	155.7	£209,274	NR13 3EF	£2,683	78	200000	S	Y	F	ACLE
February 2019	125.53	154.8	£413,112	NR13 3FA	£3,083	134	335000	D	Y	F	ACLE
April 2019	122.44	154.8	£423,538	NR13 3FA	£3,161	134	335000	D	Y	F	ACLE
November 2019	123.16	154.8	£421,062	NR13 3FA	£4,010	105	335000	D	Y	F	ACLE
May 2019	123.07	154.8	£421,370	NR13 3FA	£4,013	105	335000	D	Y	F	ACLE
May 2019	123.07	154.8	£371,057	NR13 3FA	£4,217	88	295000	D	Y	F	ACLE
July 2019	124.66	154.8	£391,160	NR13 3FA	£4,445	88	315000	D	Y	F	ACLE
August 2019	125.14	155.7	£261,283	NR13 3FA	£3,438	76	210000	S	Y	F	ACLE
May 2019	123.66	155.7	£264,410	NR13 3FA	£3,479	76	210000	S	Y	F	ACLE
June 2019	125.03	155.7	£261,513	NR13 3FA	£3,441	76	210000	S	Y	F	ACLE
June 2019	125.03	155.7	£261,513	NR13 3FA	£3,441	76	210000	S	Y	F	ACLE
April 2019	122.44	154.8	£614,446	NR13 3FF	£3,531	174	486000	D	Y	F	REEDHAM
September 2020	130.24	154.8	£600,230	NR13 3FF	£3,262	184	505000	D	Y	F	REEDHAM
March 2019	123.07	154.8	£396,214	NR13 3FF	£5,213	76	315000	D	Y	F	REEDHAM

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May 2020	126.69	154.8	£366,564	NR13 3FF	£3,363	109	300000	D	Y	F	REEDHAM
August 2019	124.51	154.8	£379,198	NR13 3FF	£4,989	76	305000	D	Y	F	REEDHAM
November 2019	123.16	154.8	£395,924	NR13 3FF	£3,632	109	315000	D	Y	F	REEDHAM
July 2020	128.68	154.8	£348,865	NR13 3FF	£4,531	77	290000	D	Y	F	REEDHAM
July 2019	124.66	154.8	£440,831	NR13 3FF	£3,584	123	355000	D	Y	F	REEDHAM
September 2019	123.45	154.8	£376,185	NR13 3FF	£4,886	77	300000	D	Y	F	REEDHAM
December 2020	128.69	154.8	£418,005	NR13 3FF	£4,058	103	347500	D	Y	F	REEDHAM
August 2020	128.77	155.7	£238,199	NR13 3FF	£3,722	64	197000	S	Y	F	REEDHAM
March 2020	125.2	155.7	£242,504	NR13 3FF	£3,789	64	195000	S	Y	F	REEDHAM
August 2020	128.05	154.8	£404,982	NR13 3FF	£3,000	135	335000	D	Y	F	REEDHAM
September 2019	123.45	154.8	£432,612	NR13 3FF	£3,517	123	345000	D	Y	F	REEDHAM
May 2022	146.6	154.8	£369,572	NR13 3FH	£3,974	93	349995	D	Y	F	ACLE
June 2022	147.5	154.8	£367,317	NR13 3FH	£3,950	93	349995	D	Y	F	ACLE
May 2022	146.6	154.8	£356,901	NR13 3FH	£3,838	93	337995	D	Y	F	ACLE

Appendix IV – Building and construction costs



£/M2 STUDY

Description: Rate per m2 gross internal floor area for the building Cost including prelims.

Last updated: 01-Jun-2024 07:27

Rebased to 1Q 2024 (390) and Norfolk (95; sample 121)

MAXIMUM AGE OF RESULTS: DEFAULT PERIOD

Building function (Maximum age of projects)	£/m ² gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
New build							
810. Housing, mixed developments (15)	1,453	776	1,255	1,402	1,593	3,604	1272
810.1 Estate housing							
Generally (15)	1,441	748	1,221	1,383	1,578	4,951	1405
Single storey (15)	1,638	968	1,379	1,572	1,795	4,951	234
2-storey (15)	1,387	748	1,196	1,345	1,522	3,011	1090
3-storey (15)	1,505	895	1,262	1,446	1,725	2,920	76
4-storey or above (15)	3,011	1,468	2,402	2,682	4,035	4,466	5
810.11 Estate housing detached (15)	1,916	1,055	1,458	1,605	2,115	4,951	19
810.12 Estate housing semi detached							
Generally (15)	1,453	838	1,237	1,420	1,592	3,200	354
Single storey (15)	1,618	1,046	1,409	1,591	1,760	3,200	80
2-storey (15)	1,404	838	1,222	1,361	1,535	2,432	263
3-storey (15)	1,443	1,049	1,166	1,383	1,710	2,051	11
810.13 Estate housing terraced							
Generally (15)	1,462	852	1,198	1,372	1,594	4,466	229

Building function (Maximum age of projects)	£/m ² gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
Single storey (15)	1,676	1,065	1,386	1,657	1,951	2,372	18
2-storey (15)	1,398	852	1,190	1,338	1,522	3,011	177
3-storey (15)	1,515	895	1,258	1,415	1,667	2,920	32
4-storey or above (15)	4,250	4,035	-	-	-	4,466	2
816. Flats (apartments)							
Generally (15)	1,698	849	1,403	1,597	1,915	5,804	811
1-2 storey (15)	1,605	979	1,362	1,515	1,786	3,183	173
3-5 storey (15)	1,678	849	1,398	1,595	1,887	3,491	541
6 storey or above (15)	1,993	1,221	1,609	1,895	2,157	5,804	94
820.1 'One-off' housing detached (3 units or less)							
Generally (15)	2,678	1,051	1,845	2,381	3,171	6,869	121
Single storey (15)	2,187	1,285	1,615	2,087	2,771	3,939	28
2-storey (15)	2,636	1,051	1,821	2,290	3,028	6,624	65
3-storey (15)	3,067	1,413	2,475	3,117	3,396	5,506	23
4-storey or above (20)	4,507	2,047	2,860	4,678	6,057	6,869	6
843. Supported housing							
Generally (15)	1,818	925	1,503	1,691	2,005	3,649	130
Single storey (15)	2,146	1,297	1,674	2,063	2,264	3,649	13
2-storey (15)	1,828	945	1,501	1,655	2,117	3,175	44
3-storey (15)	1,678	925	1,503	1,607	1,842	2,472	44
4-storey or above (15)	1,857	1,136	1,488	1,730	1,897	3,534	26
843.1 Supported housing with shops, restaurants or the like (15)	1,747	1,103	1,468	1,651	1,908	2,914	36

Appendix V – Results sheets

Greenfield sites

Test Ref	Notes	Greenfield/ Brownfield	Dwgs	Gross Ha	Net Ha	Density (dwgs per net ha)	Net to gross %	GDV £s	BMLV per ha £s	Scheme Residual Value £s	Scheme Headroom per unit £s
Res1a VA: Broads general : 0% AH	Base	Greenfield	1	0.067	0.067	14.93	100.0%	356,250	350,000	-108,754	-108,754
Res2a VA: Broads general : 33% AH	Base	Greenfield	3	0.200	0.200	15.00	100.0%	886,640	350,000	41,805	13,935
Res3a VA: Broads general : 33% AH	Base	Greenfield	5	0.330	0.330	15.15	100.0%	1,581,534	350,000	145,863	29,173
Res4a VA: Broads general : 33% AH	Base	Greenfield	8	0.400	0.400	20.00	100.0%	2,530,431	350,000	339,026	42,378
Res5a VA: Broads general : 33% AH	Base	Greenfield	12	0.630	0.630	19.05	100.0%	3,795,588	350,000	578,522	48,210
Res6a VA: Broads general : 33% AH	Base	Greenfield	30	1.330	1.200	25.00	90.2%	9,488,970	350,000	1,555,142	51,838
Res7a VA: Broads general : 33% AH	Base	Greenfield	100	3.110	2.330	42.92	74.9%	30,379,275	350,000	5,081,813	50,818
OP1 VA: Broads general : 33% AH	Base	Greenfield	50	0.500	0.500	100.00	100.0%	12,747,215	350,000	- 1,606,447	-32,129
Res2a VA: Broads general : 33% AH	70% Social Rent	Greenfield	3	0.200	0.200	15.00	100.0%	859,613	350,000	16,399	5,466
Res3a VA: Broads general : 33% AH	70% Social Rent	Greenfield	5	0.330	0.330	15.15	100.0%	1,539,492	350,000	106,343	21,269
Res4b VA: Broads general : 33% AH	70% Social Rent	Greenfield	8	0.400	0.400	20.00	100.0%	2,463,164	350,000	275,795	34,474

Test Ref	Notes	Greenfield/ Brownfield	Dwgs	Gross Ha	Net Ha	Density (dwgs per net ha)	Net to gross %	GDV £s	BMLV per ha £s	Scheme Residual Value £s	Scheme Headroom per unit £s
Res5a VA: Broads general : 33% AH	70% Social Rent	Greenfield	12	0.630	0.630	19.05	100.0%	3,694,687	350,000	483,675	40,306
Res6a VA: Broads general : 33% AH	70% Social Rent	Greenfield	30	1.330	1.200	25.00	90.2%	9,236,718	350,000	1,316,304	43,877
Res7a VA: Broads general : 33% AH	70% Social Rent	Greenfield	100	3.110	2.330	42.92	74.9%	29,538,435	350,000	4,283,501	42,835
OP1 VA: Broads general : 33% AH	70% Social Rent	Greenfield	50	0.500	0.500	100.00	100.0%	12,394,940	350,000	- 1,966,856	-39,337

Brownfield sites

Test Ref	Notes	Greenfield/ Brownfield	Dwgs	Gross Ha	Net Ha	Density (dwgs per net ha)	Net to gross %	GDV £s	BMLV per ha £s	Scheme Residual Value £s	Scheme Headroom per unit £s
Res1a VA: Broads general : 0% AH	Base	Brownfield	1	0.067	0.067	14.93	100.0%	356,250	400,000	-111,383	-111,383
Res2a VA: Broads general : 33% AH	Base	Brownfield	3	0.200	0.200	15.00	100.0%	886,640	400,000	34,104	11,368
Res3a VA: Broads general : 33% AH	Base	Brownfield	5	0.330	0.330	15.15	100.0%	1,581,534	400,000	133,206	26,641
Res4b VA: Broads general : 33% AH	Base	Brownfield	8	0.400	0.400	20.00	100.0%	2,530,431	400,000	325,627	40,703
Res5a VA: Broads general : 33% AH	Base	Brownfield	12	0.630	0.630	19.05	100.0%	3,795,588	400,000	554,609	46,217

Three Dragons

Broads Authority Local Plan Viability Assessment Technical Appendices - October 2024

Test Ref	Notes	Greenfield/ Brownfield	Dwgs	Gross Ha	Net Ha	Density (dwgs per net ha)	Net to gross %	GDV £s	BMLV per ha £s	Scheme Residual Value £s	Scheme Headroom per unit £s
Res6a VA: Broads general : 33% AH	Base	Brownfield	30	1.330	1.200	25.00	90.2%	9,488,970	400,000	1,509,327	50,311
Res7a VA: Broads general : 33% AH	Base	Brownfield	100	3.110	2.330	42.92	74.9%	30,379,275	400,000	4,927,251	49,273

Test Ref	Notes	Greenfield/ Brownfield	Dwgs	Gross Ha	Net Ha	Density (dwgs per net ha)	Net to gross %	GDV £s	BMLV per ha £s	Scheme Residual Value £s	Scheme Headroo m per unit £s
Res1a VA: Broads general: 0% AH	Base	Brownfield	1	0.067	0.067	14.93	100.0 %	356,250	450,000	-115,031	-115,031
Res2a VA: Broads general: 33% AH	Base	Brownfield	3	0.200	0.200	15.00	100.0 %	886,640	450,000	23,399	7,800
Res3a VA: Broads general: 33% AH	Base	Brownfield	5	0.330	0.330	15.15	100.0 %	1,581,534	450,000	115,543	23,109
Res4b VA: Broads general: 33% AH	Base	Brownfield	8	0.400	0.400	20.00	100.0 %	2,530,431	450,000	304,218	38,027
Res5a VA: Broads general: 33% AH	Base	Brownfield	12	0.630	0.630	19.05	100.0 %	3,795,588	450,000	519,233	43,269
Res6a VA: Broads general: 33% AH	Base	Brownfield	30	1.330	1.200	25.00	90.2%	9,488,970	450,000	1,433,369	47,779
Res7a VA: Broads general: 33% AH	Base	Brownfield	100	3.110	2.330	42.92	74.9%	30,379,275	450,000	4,673,448	46,734
OP1 Brownfield VA: Broads general : 33% AH	Base	Brownfield	50	0.500	0.500	100.00	100.0 %	12,747,215	450,000	- 1,610,566	-32,211
Res2b Bungalows VA: Broads general : 33% AH	Base	Brownfield	3	0.200	0.200	15.00	100.0 %	1,046,558	450,000	87,370	29,123

Test Ref	Notes	Greenfield/ Brownfield	Dwgs	Gross Ha	Net Ha	Density (dwgs per net ha)	Net to gross %	GDV £s	BMLV per ha £s	Scheme Residual Value £s	Scheme Headroo m per unit £s
Res2a VA: Broads general : 33% AH	70% SR	Brownfield	3	0.200	0.200	15.00	100.0 %	859,613	450,000	-2,006	-669
Res3a VA: Broads general : 33% AH	70% SR	Brownfield	5	0.330	0.330	15.15	100.0 %	1,539,492	450,000	76,024	15,205
Res4b VA: Broads general : 33% AH	70% SR	Brownfield	8	0.400	0.400	20.00	100.0 %	2,463,164	450,000	240,986	30,123
Res5a VA: Broads general : 33% AH	70% SR	Brownfield	12	0.630	0.630	19.05	100.0 %	3,694,687	450,000	424,386	35,365
Res6a VA: Broads general : 33% AH	70% SR	Brownfield	30	1.330	1.200	25.00	90.2%	9,236,718	450,000	1,194,531	39,818
Res7a VA: Broads general : 33% AH	70% SR	Brownfield	100	3.110	2.330	42.92	74.9%	29,538,435	450,000	3,845,465	38,455
OP1 Brownfield VA: Broads general : 33% AH	70% SR	Brownfield	50	0.500	0.500	100.00	100.0 %	12,394,940	450,000	-1,971,263	-39,425
Res2b Bungalows VA: Broads general: 33% AH	70% SR	Brownfield	3	0.200	0.200	15.00	100.0 %	1,019,531	450,000	61,965	20,655

Brownfield – Upper Quartile build costs

Test Ref	Notes	Greenfield/ Brownfield	Dwgs	Gross Ha	Net Ha	Density (dwgs per net ha)	Net to gross %	GDV £s	BMLV per ha £s	Scheme Residual Value £s	Scheme Headroom per unit £s
Res1a VA: Broads general : 0% AH	Base	Brownfield	1	0.067	0.067	14.93	100.0%	356,250	450,000	-181,015	-181,015
Res2a VA: Broads general : 33% AH	Base	Brownfield	3	0.200	0.200	15.00	100.0%	886,640	450,000	-31,802	-10,601
Res3a VA: Broads general : 33% AH	Base	Brownfield	5	0.330	0.330	15.15	100.0%	1,581,534	450,000	22,841	4,568
Res4b VA: Broads general : 33% AH	Base	Brownfield	8	0.400	0.400	20.00	100.0%	2,530,431	450,000	163,104	20,388
Res5a VA: Broads general : 33% AH	Base	Brownfield	12	0.630	0.630	19.05	100.0%	3,795,588	450,000	318,382	26,532
Res6a VA: Broads general : 33% AH	Base	Brownfield	30	1.330	1.200	25.00	90.2%	9,488,970	450,000	929,033	30,968
Res7a VA: Broads general : 33% AH	Base	Brownfield	100	3.110	2.330	42.92	74.9%	30,379,275	450,000	3,137,251	31,373
Res2a VA: Broads general : 33% AH	70% SR	Brownfield	3	0.200	0.200	15.00	100.0%	859,613	450,000	-57,207	-19,069
Res3a VA: Broads general : 33% AH	70% SR	Brownfield	5	0.330	0.330	15.15	100.0%	1,539,492	450,000	-16,679	-3,336
Res4b VA: Broads general : 33% AH	70% SR	Brownfield	8	0.400	0.400	20.00	100.0%	2,463,164	450,000	99,873	12,484
Res5a VA: Broads general : 33% AH	70% SR	Brownfield	12	0.630	0.630	19.05	100.0%	3,694,687	450,000	223,535	18,628
Res6a VA: Broads general : 33% AH	70% SR	Brownfield	30	1.330	1.200	25.00	90.2%	9,236,718	450,000	690,195	23,006
Res7a VA: Broads general : 33% AH	70% SR	Brownfield	100	3.110	2.330	42.92	74.9%	29,538,435	450,000	2,303,989	23,040

Waterfront

Test Ref	Notes	Greenfield/ Brownfield	Dwgs	Gross Ha	Net Ha	Density (dwgs per net ha)	Net to gross %	GDV £s	BMLV per ha £s	Scheme Residual Value £s	Scheme Headroom per unit £s
Res1a VA: Waterfront : 0% AH	Base	Brownfield	1	0.067	0.067	14.93	100.0%	463,125	720,000	-114,087	-114,087
Res2a VA: Waterfront : 33% AH	Base	Brownfield	3	0.200	0.200	15.00	100.0%	1,123,436	720,000	101,612	33,871
Res3a VA: Waterfront : 33% AH	Base	Brownfield	5	0.330	0.330	15.15	100.0%	2,010,925	720,000	273,300	54,660
Res4a VA: Waterfront : 33% AH	Base	Brownfield	8	0.400	0.400	20.00	100.0%	3,217,449	720,000	596,726	74,591
Res5a VA: Waterfront: 33% AH	Base	Brownfield	12	0.630	0.630	19.05	100.0%	4,826,097	720,000	957,336	79,778
Res6a VA: Waterfront : 33% AH	Base	Brownfield	30	1.330	1.200	25.00	90.2%	12,065,243	720,000	2,611,153	87,038
Res7a VA: Waterfront : 33% AH	Base	Brownfield	100	3.110	2.330	42.92	74.9%	38,591,663	720,000	8,538,218	85,382
OP1 Brownfield VA: Waterfront : 33% AH	Base	Brownfield	50	0.500	0.500	100.00	100.0%	16,203,904	720,000	1,260,923	25,218
Res2b Bungalows VA: Waterfront : 33% AH	Base	Brownfield	3	0.200	0.200	15.00	100.0%	1,331,004	720,000	259,300	86,433
Res2a VA: Waterfront : 33% AH	70% SR	Brownfield	3	0.200	0.200	15.00	100.0%	1,096,409	720,000	76,206	25,402
Res3a VA: Waterfront : 33% AH	70% SR	Brownfield	5	0.330	0.330	15.15	100.0%	1,968,883	720,000	233,781	46,756
Res4b VA: Waterfront : 33% AH	70% SR	Brownfield	8	0.400	0.400	20.00	100.0%	3,150,182	720,000	533,495	66,687
Res5a VA: Waterfront: 33% AH	70% SR	Brownfield	12	0.630	0.630	19.05	100.0%	4,725,196	720,000	862,489	71,874

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Test Ref	Notes	Greenfield/ Brownfield	Dwgs	Gross Ha	Net Ha	Density (dwgs per net ha)	Net to gross %	GDV £s	BMLV per ha £s	Scheme Residual Value £s	Scheme Headroom per unit £s
Res6a VA: Waterfront : 33% AH	70% SR	Brownfield	30	1.330	1.200	25.00	90.2%	11,812,991	720,000	2,372,315	79,077
Res7a VA: Waterfront : 33% AH	70% SR	Brownfield	100	3.110	2.330	42.92	74.9%	37,750,823	720,000	7,740,765	77,408
OP1 Brownfield VA: Waterfront : 33% AH	70% SR	Brownfield	50	0.500	0.500	100.00	100.0%	15,851,629	720,000	901,969	18,039
Res2b Bungalows VA: Waterfront : 33% AH	70% SR	Brownfield	3	0.200	0.200	15.00	100.0%	1,303,977	720,000	233,894	77,965

Appendix VI – Sample summary appraisals

Sample of viability summary reports from the models

Summary Report 3											
Site Name	Res1b VA: Broads general : 0% AH								Land and Developer Returns Assumptions		
Site Information									Land & associated costs included in cashflow		
									Developer & contractor returns excluded from cashflow		
Date	19/08/2024	Updated		Compiled by	TM	Reference	Res1b				
Summary Details					Dwellings	NIA (Exc garages & circ space)	Garages	Circ space	Total GIA (inc circ space & garages)		
	Net Area	0.07	hectares		1.00	95.0	18.0	18.0	131.0		
	Gross Area	0.07	hectares	Market	1.00	95.0	18.0	18.0	131.0		
	Net to Gross %	100.00%		Affordable	-	-	-	-	-		
Density	14.93	per net ha	% Affordable	0.00%							
Scheme Revenue											
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Total No of Units	1.00	1.00	-	-	-	-	-	-	-	-	-
Total NIA exc garages & circ space (sq m)	95.0	95.0	-	-	-	-	-	-	-	-	-
Garages (sq m)	18.0	18.0	-	-	-	-	-	-	-	-	-
Total NIA inc garages exc circ space (sq m)	113.0	113.0	-	-	-	-	-	-	-	-	-
Tenure Split (by %)		100.00%									
Sales Revenue (£)	356,250	356,250	-	-	-	-	-	-	-	-	-
Average Revenue per unit	356,250	356,250	-	-	-	-	-	-	-	-	-
Average Revenue per sq m GIA	3,750	3,750	-	-	-	-	-	-	-	-	-
Capital Contributions											
0	-										
0	-										
0	-										
0	-										
0	-										
0	-										
0	-										
Total Capital contributions (£)	-										
Total Revenue (£)	356,250										
Scheme Development Costs											
Land	30,150	450,000	per gross ha								
SDLT at prevailing rate	-										
Agents Fees (1%), Legal Fees (0.75%) Total -	528										
Land & associated fees Total	30,678	457,881	per gross ha								
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Build Cost (£)	264,332	264,332	-	-	-	-	-	-	-	-	-
Plot costs (£)	17,809	17,809	-	-	-	-	-	-	-	-	-
Garage Build Costs (£)	8,100	8,100	-	-	-	-	-	-	-	-	-
Additional Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-
Total GIA inc circ space & garages (sq m)	113	113	-	-	-	-	-	-	-	-	-
Total Contingency - 0% Build Costs	-	-	-	-	-	-	-	-	-	-	-
Total Build Cost (£)	290,241	290,241	-	-	-	-	-	-	-	-	-
Policy & Infrastructure Costs											
Total Site Infrastructure Costs	22,897										
Biodiversity (20%) inc. service charge	304										
Part M4(2)	1,400										
Part M4(3) House	-										
Part M4(3) Flat	-										
S106 (sites over 10 units)	-										
Electric Charging Vehicle	865										
RAMS	221										
Voids (older persons only)	-										
	-										
	-										
	-										
	-										
	-										
Total Policy & Infrastructure Costs (£)	25,687										
Sales & Marketing/Legal Fees (mkt)	10,688	10,688	-	-	-	-	-	-	-	-	-
Sales & Marketing/Legal Fees (aff)	-										
Professional Fees Total (£)	36,280	36,280	-	-	-	-	-	-	-	-	-
CIL (£)	-										
Total Development Costs (£)	393,573										
Development Period: 1 Year											
Debit Interest Rate	7.00%										
Credit Interest Rate	0.00%										
Annual Discount Rate	0.00%										
Notes											
You can add notes here! And they print											
Revenue and Capital Contributions	356,250										
Land & associated Fees - inc in interest calc	30,678										
Development Costs	362,895										
Finance	15,364										
ADR Cost	0										
Total Dev Costs inc Finance & ADR Costs	408,937										
Gross Residual Value inc land less finance (£)	-52,687										
Total Developer/Contractor Return	62,344										
Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)	-115,031										

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Summary Report 3												
Site Name	Res2b VA: Broads general : 33% AH						Land and Developer Returns Assumptions					
Site Information							Land & associated costs included in cashflow					
							Developer & contractor returns excluded from cashflow					
Date	19/08/2024	Updated		Compiled by	TM	Reference	Res2b					
Summary Details												
	Net Area	0.20	hectares			Dwellings	NIA (Exc garages & circ space)	Garages	Circ space	Total GIA (inc circ space & garages)		
	Gross Area	0.20	hectares		Market	3.00	283.0	36.2	36.2	355.4		
	Net to Gross %	100.00%			Affordable	2.01	191.0	36.2	36.2	263.3		
	Density	15.00	per net ha		% Affordable	0.99	92.1	-	-	92.1		
						33.00%						
Scheme Revenue												
		Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Total No of Units		3.00	2.01	-	-	-	-	0.69	-	-	0.30	-
Total NIA exc garages & circ space (sq m)		283.0	191.0	-	-	-	-	64.4	-	-	27.6	-
Garages (sq m)		36.2	36.2	-	-	-	-	-	-	-	-	-
Total NIA inc garages exc circ space (sq m)		319.2	227.1	-	-	-	-	64.4	-	-	27.6	-
Tenure Split (by %)			67.00%					23.10%			9.90%	
Sales Revenue (£)		886,640	716,063	-	-	-	-	98,406	-	-	72,171	-
Average Revenue per unit		295,547	356,250	-	-	-	-	142,000	-	-	243,000	-
Average Revenue per sq m GIA		3.133	3,750	-	-	-	-	1,527	-	-	2,613	-
Capital Contributions												
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
Total Capital contributions (£)		-										
Total Revenue (£)		886,640										
Scheme Development Costs												
Land	90,000	450,000 per gross ha										
SDLT at prevailing rate	-											
Agents Fees (1%), Legal Fees (0.75%) Total	1,575											
Land & associated fees Total	91,575	457,875 per gross ha										
		Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Build Cost (£)	444,909	300,175	-	-	-	-	-	101,314	-	-	43,420	-
Plot costs (£)	29,975	20,224	-	-	-	-	-	6,826	-	-	2,925	-
Garage Build Costs (£)	16,281	16,281	-	-	-	-	-	-	-	-	-	-
Additional Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-	-
Total GIA inc circ space & garages (sq m)	319	227	-	-	-	-	-	64	-	-	28	-
Total Contingency - 0% Build Costs	-	-	-	-	-	-	-	-	-	-	-	-
Total Build Cost (£)	491,165	336,679	-	-	-	-	-	108,140	-	-	46,346	-
Policy & Infrastructure Costs												
Total Site Infrastructure Costs	37,682											
Biodiversity (20%) inc. service charge	912											
Part M4(2)	4,200											
Part M4(3a) House	1,436											
Part M4(3a) Flat	-											
S106 (sites over 10 units)	-											
Electric Charging Vehicle	2,595											
RAMS	664											
Voids (older persons only)	-											
	-											
	-											
	-											
	-											
	-											
	-											
Total Policy & Infrastructure Costs (£)	47,489											
Sales & Marketing/Legal Fees (mkt)	21,482	21,482	-	-	-	-	-	-	-	-	-	-
Sales & Marketing/Legal Fees (aff)	495	-	-	-	-	-	347	-	-	-	149	-
Professional Fees Total (£)	49,117	33,668	-	-	-	-	10,814	-	-	-	4,635	-
CIL (£)	-											
Total Development Costs (£)	701,322											
Financial Assumptions												
Development Period	1 Year											
Debit Interest Rate	7.00%											
Credit Interest Rate	0.00%											
Annual Discount Rate	0.00%											
Notes												
You can add notes here! And they print												
Revenue and Capital Contributions	886,640											
Land & associated Fees - inc in interest calc	91,575											
Development Costs	609,747											
Finance	26,372											
ADR Cost	0											
Total Dev Costs Inc Finance & ADR Costs	727,695											
Gross Residual Value inc land less finance (£)	158,945											
Total Developer/Contractor Return	135,546											
Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)	23,399											

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Summary Report 3												
Site Name	Res2b VA: Waterfront : 33% AH						Land and Developer Returns Assumptions					
Site Information							Land & associated costs included in cashflow Developer & contractor returns excluded from cashflow					
Date	19/08/2024	Updated		Compiled by	TM	Reference	Res2b					
Summary Details						Dwellings	NIA (Exc garages & circ space)	Garages	Circ space	Total GIA (inc circ space & garages)		
	Net Area	0.20	hectares			3.00	283.0	36.2	36.2	355.4		
	Gross Area	0.20	hectares	Market		2.01	191.0	36.2	36.2	263.3		
	Net to Gross %	100.00%		Affordable		0.99	92.1	-	-	92.1		
	Density	15.00	per net ha	% Affordable		33.00%						
Scheme Revenue												
		Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Total No of Units		3.00	2.01	-	-	-	-	0.69	-	-	0.30	-
Total NIA exc garages & circ space (sq m)		283.0	191.0	-	-	-	-	64.4	-	-	27.6	-
Garages (sq m)		36.2	36.2	-	-	-	-	-	-	-	-	-
Total NIA inc garages exc circ space (sq m)		319.2	227.1	-	-	-	-	64.4	-	-	27.6	-
Tenure Split (by %)			67.00%					23.10%			9.90%	
Sales Revenue (£)		1,123,436	930,881	-	-	-	-	98,406	-	-	94,149	-
Average Revenue per unit		374,479	463,125	-	-	-	-	142,000	-	-	317,000	-
Average Revenue per sq m GIA		3,969	4,875	-	-	-	-	1,527	-	-	3,409	-
Capital Contributions		0	-									
		0	-									
		0	-									
		0	-									
		0	-									
		0	-									
		0	-									
Total Capital contributions (£)		-	-									
Total Revenue (£)		1,123,436										
Scheme Development Costs												
Land		144,000	720,000	per gross ha								
SDLT at prevailing rate		-										
Agents Fees (1%), Legal Fees (0.75%) Total		2,520										
Land & associated fees Total		146,520	732,600	per gross ha								
		Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Build Cost (£)		487,254	328,744	-	-	-	-	110,957	-	-	47,553	-
Plot costs (£)		32,827	22,148	-	-	-	-	7,475	-	-	3,204	-
Garage Build Costs (£)		16,281	16,281	-	-	-	-	-	-	-	-	-
Additional Build Costs (£)		-	-	-	-	-	-	-	-	-	-	-
Total GIA inc circ space & garages (sq m)		319	227	-	-	-	-	64	-	-	28	-
Total Contingency - 0% Build Costs		-	-									
Total Build Cost (£)		536,362	367,173	-	-	-	-	118,432	-	-	50,757	-
Policy & Infrastructure Costs												
Total Site Infrastructure Costs		41,269										
Biodiversity (20%) inc. service charge		912										
Part M4(2)		4,200										
Part M4(3a) House		1,436										
Part M4(3a) Flat		-										
S106 (sites over 10 units)		-										
Electric Charging Vehicle		2,595										
RAMS		664										
Voids (older persons only)		-										
		-										
		-										
		-										
		-										
		-										
Total Policy & Infrastructure Costs (£)		51,076										
Sales & Marketing/Legal Fees (mkt)		27,926	27,926	-	-	-						
Sales & Marketing/Legal Fees (aff)		495						347	-	-	149	-
Professional Fees Total (£)		53,636	36,717	-	-	-		11,843	-	-	5,076	-
CIL (£)		-										
Total Development Costs (£)		816,016										
Development Period		1 Year										
Debit Interest Rate		7.00%										
Credit Interest Rate		0.00%										
Annual Discount Rate		0.00%										
Revenue and Capital Contributions		1,123,436										
Land & associated Fees - inc in interest calc		146,520										
Development Costs		669,496										
Finance		31,351										
ADR Cost		0										
Total Dev Costs Inc Finance & ADR Costs		847,367										
Gross Residual Value inc land less finance (£)		276,069										
Total Developer/Contractor Return		174,458										
Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)		101,612										
Notes	You can add notes here! And they print											

Summary Report 3											
Site Name	Res3a VA: Broads general : 33% AH										Land and Developer Returns Assumptions Land & associated costs included in cashflow Developer & contractor returns excluded from cashflow
Site Information											
Date	19/08/2024	Updated		Compiled by	TM	Reference	Res3a				
Summary Details					Dwellings	NIA (Exc garages & circ space)	Garages	Circ space	Total GIA (inc circ space & garages)		
	Net Area	0.33	hectares		5.00	486.8	-	1.3	488.1		
	Gross Area	0.33	hectares	Market	3.35	351.8	-	-	351.8		
	Net to Gross %	100.00%		Affordable	1.65	135.1	-	1.3	136.4		
	Density	15.15	per net ha	% Affordable	33.00%						
Scheme Revenue											
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Total No of Units	5.00	3.35	-	-	-	-	1.16	-	-	0.50	-
Total NIA exc garages & circ space (sq m)	486.8	351.8	-	-	-	-	92.5	-	-	42.6	-
Garages (sq m)	-	-	-	-	-	-	-	-	-	-	-
Total NIA inc garages exc circ space (sq m)	486.8	351.8	-	-	-	-	92.5	-	-	42.6	-
Tenure Split (by %)		67.00%					23.10%			9.90%	
Sales Revenue (£)	1,581,534	1,319,102	-	-	-	-	151,305	-	-	111,128	-
Average Revenue per unit	316,301	393,750	-	-	-	-	131,000	-	-	224,500	-
Average Revenue per sq m GIA	3,249	3,750	-	-	-	-	1,635	-	-	2,610	-
Capital Contributions											
	0	-									
	0	-									
	0	-									
	0	-									
	0	-									
	0	-									
Total Capital contributions (£)	-										
Total Revenue (£)	1,581,534										
Scheme Development Costs											
Land	115,500	350,000	per gross ha								
SDLT at prevailing rate	-										
Agents Fees (1%), Legal Fees (0.75%) Total	2,021										
Land & associated fees Total	117,521	356,124	per gross ha								
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Build Cost (£)	768,569	552,970	-	-	-	-	148,679	-	-	66,920	-
Plot costs (£)	51,780	37,255	-	-	-	-	10,017	-	-	4,509	-
Garage Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-
Additional Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-
Total GIA inc circ space & garages (sq m)	488	352	-	-	-	-	94	-	-	43	-
Total Contingency - 0% Build Costs	-										
Total Build Cost (£)	820,350	590,225	-	-	-	-	158,696	-	-	71,429	-
Policy & Infrastructure Costs											
Total Site Infrastructure Costs	65,095										
Biodiversity (20%) inc. service charge	6,360										
Part M4(2)	7,000										
Part M4(3a) House	2,058										
Part M4(3a) Flat	231										
S106 (sites over 10 units)	-										
Electric Charging Vehicle	4,325										
RAMS	1,106										
Voids (older persons only)	-										
	-										
	-										
	-										
	-										
	-										
Total Policy & Infrastructure Costs (£)	86,175										
Sales & Marketing/Legal Fees (mkt)	39,573	39,573	-	-	-	-	-	-	-	248	-
Sales & Marketing/Legal Fees (aff)	825	-	-	-	-	-	578	-	-	7,143	-
Professional Fees Total (£)	82,035	59,022	-	-	-	-	15,870	-	-	7,143	-
CIL (£)	-										
Total Development Costs (£)	1,146,479										
Development Period: 1 Year											
Debit Interest Rate	7.00%										
Credit Interest Rate	0.00%										
Annual Discount Rate	0.00%										
Notes											
Revenue and Capital Contributions	1,581,534										
Land & associated Fees - inc in interest calc	117,521										
Development Costs	1,028,958										
Finance	42,604										
ADR Cost	0										
Total Dev Costs inc Finance & ADR Costs	1,189,083										
Gross Residual Value inc land less finance (£)	392,451										
Total Developer/Contractor Return	246,589										
Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)	145,863										

Summary Report 3											
Site Name	Res4b VA: Broads general : 33% AH									Land and Developer Returns Assumptions	
Site Information										Land & associated costs included in cashflow	
										Developer & contractor returns excluded from cashflow	
Date	19/08/2024	Updated		Compiled by		TM	Reference	Res4b			
Summary Details										Dwellings	Total GIA (inc circ space & garages)
Net Area	0.40	hectares				8.00	778.9	32.2	34.2	845.3	
Gross Area	0.40	hectares		Market		5.36	562.8	32.2	32.2	627.1	
Net to Gross %	100.00%			Affordable		2.64	216.1	-	2.1	218.2	
Density	20.00	per net ha		% Affordable		33.00%					
Scheme Revenue											
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Total No of Units	8.00	5.36	-	-	-	-	1.85	-	-	0.79	-
Total NIA exc garages & circ space (sq m)	778.9	562.8	-	-	-	-	148.0	-	-	68.1	-
Garages (sq m)	32.2	32.2	-	-	-	-	-	-	-	-	-
Total NIA inc garages exc circ space (sq m)	811.1	595.0	-	-	-	-	148.0	-	-	68.1	-
Tenure Split (by %)		67.00%					23.10%			9.90%	
Sales Revenue (£)	2,530,431	2,110,539	-	-	-	-	242,088	-	-	177,804	-
Average Revenue per unit	316,300	393,750	-	-	-	-	131,000	-	-	224,500	-
Average Revenue per sq m GIA	3,249	3,750	-	-	-	-	1,635	-	-	2,610	-
Capital Contributions											
0	-										
0	-										
0	-										
0	-										
0	-										
0	-										
0	-										
Total Capital contributions (£)	-										
Total Revenue (£)	2,530,431										
Scheme Development Costs											
Land	180,000	450,000	per gross ha								
SDLT at prevailing rate	-										
Agents Fees (1%), Legal Fees (0.75%) Total	3,150										
Land & associated fees Total	183,150	457,875	per gross ha								
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Build Cost (£)	1,172,812	842,639	-	-	-	-	228,196	-	-	101,977	-
Plot costs (£)	79,015	56,771	-	-	-	-	15,374	-	-	6,870	-
Garage Build Costs (£)	14,472	14,472	-	-	-	-	-	-	-	-	-
Additional Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-
Total GIA inc circ space & garages (sq m)	813	595	-	-	-	-	150	-	-	68	-
Total Contingency - 0% Build Costs	-										
Total Build Cost (£)	1,266,300	913,882	-	-	-	-	243,570	-	-	108,848	-
Policy & Infrastructure Costs											
Total Site Infrastructure Costs	99,333										
Biodiversity (20%) inc. service charge	2,432										
Part M4(2)	11,200										
Part M4(3a) House	3,292										
Part M4(3a) Flat	370										
S106 (sites over 10 units)	-										
Electric Charging Vehicle	6,920										
RAMS	1,769										
Voids (older persons only)	-										
-	-										
-	-										
-	-										
-	-										
-	-										
Total Policy & Infrastructure Costs (£)	125,316										
Sales & Marketing/Legal Fees (mkt)	63,316	63,316	-	-	-						
Sales & Marketing/Legal Fees (aff)	1,320						924	-	-	396	-
Professional Fees Total (£)	126,630	91,388	-	-	-		24,357	-	-	10,885	-
CIL (£)	-										
Total Development Costs (£)	1,766,032										
Development Period: 1 Year											
Debit Interest Rate	7.00%										
Credit Interest Rate	0.00%										
Annual Discount Rate	0.00%										
Notes											
You can add notes here! And they print											
Revenue and Capital Contributions	2,530,431										
Land & associated Fees - inc in interest calc	183,150										
Development Costs	1,582,882										
Finance	65,644										
ADR Cost	0										
Total Dev Costs inc Finance & ADR Costs	1,831,676										
Gross Residual Value inc land less finance (£)	698,756										
Total Developer/Contractor Return	394,538										
Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)	304,218										

Summary Report 3											
Site Name	Res5b VA: Waterfront : 33% AH						Land and Developer Returns Assumptions				
Site Information							Land & associated costs included in cashflow Developer & contractor returns excluded from cashflow				
Date	19/08/2024	Updated		Compiled by	TM	Reference	Res5b				
Summary Details							Dwellings	NIA (Exc garages & circ space)	Garages	Circ space	Total GIA (inc circ space & garages)
Net Area		0.63 hectares		Market Affordable		12.00	1,168.4	48.2	51.3	1,268.0	
Gross Area		0.63 hectares				8.04	844.2	48.2	48.2	940.7	
Net to Gross %		100.00%				3.96	324.2	-	3.1	327.3	
Density		19.05 per net ha		% Affordable		33.00%					
Scheme Revenue											
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Total No of Units	12.00	8.04	-	-	-	-	2.77	-	-	1.19	-
Total NIA exc garages & circ space (sq m)	1,168.4	844.2	-	-	-	-	222.0	-	-	102.2	-
Garages (sq m)	48.2	48.2	-	-	-	-	-	-	-	-	-
Total NIA inc garages exc circ space (sq m)	1,216.6	892.4	-	-	-	-	222.0	-	-	102.2	-
Tenure Split (by %)		67.00%					23.10%			9.90%	
Sales Revenue (£)	4,826,097	4,115,475	-	-	-	-	363,132	-	-	347,490	-
Average Revenue per unit	402,175	511,875	-	-	-	-	131,000	-	-	292,500	-
Average Revenue per sq m GIA	4,130	4,875	-	-	-	-	1,635	-	-	3,401	-
Capital Contributions											
	0	-									
	0	-									
	0	-									
	0	-									
	0	-									
	0	-									
Total Capital contributions (£)	-										
Total Revenue (£)	4,826,097										
Scheme Development Costs											
Land	453,600	720,000 per gross ha									
SDLT at prevailing rate	12,180										
Agents Fees (1%), Legal Fees (0.75%) Total	7,938										
Land & associated fees Total	473,718	751,933 per gross ha									
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Build Cost (£)	1,827,935	1,314,809	-	-	-	-	354,003	-	-	159,123	-
Plot costs (£)	123,152	88,582	-	-	-	-	23,850	-	-	10,720	-
Garage Build Costs (£)	21,708	21,708	-	-	-	-	-	-	-	-	-
Additional Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-
Total GIA inc circ space & garages (sq m)	1,220	892	-	-	-	-	225	-	-	102	-
Total Contingency - 0% Build Costs	-										
Total Build Cost (£)	1,972,795	1,425,098	-	-	-	-	377,853	-	-	169,843	-
Policy & Infrastructure Costs											
Total Site Infrastructure Costs	154,820										
Biodiversity (20%) inc. service charge	3,648										
Part M4(2)	16,800										
Part M4(3a) House	4,939										
Part M4(3a) Flat	554										
S106 (sites over 10 units)	30,000										
Electric Charging Vehicle	10,380										
RAMS	2,654										
VOIDS (older persons only)	-										
	-										
	-										
	-										
	-										
	-										
Total Policy & Infrastructure Costs (£)	223,795										
Sales & Marketing/Legal Fees (mkt)	123,464	123,464	-	-	-						
Sales & Marketing/Legal Fees (aff)	1,980						1,386	-	-	594	-
Professional Fees Total (£)	197,280	142,510	-	-	-		37,785	-	-	16,984	-
CIL (£)	-										
Total Development Costs (£)	2,993,032										
Development Period: 1 Year											
Debit Interest Rate	7.00%										
Credit Interest Rate	0.00%										
Annual Discount Rate	0.00%										
Notes											
You can add notes here! And they print											
Revenue and Capital Contributions	4,826,097										
Land & associated Fees - inc in interest calc	473,718										
Development Costs	2,519,314										
Finance	112,884										
ADR Cost	0										
Total Dev Costs Inc Finance & ADR Costs	3,105,915										
Gross Residual Value inc land less finance (£)	1,720,182										
Total Developer/Contractor Return	762,845										
Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)	957,336										

Summary Report 3												
Site Name	Res6b VA: Broads general : 33% AH						Land and Developer Returns Assumptions					
Site Information							Land & associated costs included in cashflow					
							Developer & contractor returns excluded from cashflow					
Date	19/08/2024	Updated		Compiled by	TM	Reference	Res6b					
Summary Details							Dwellings	NIA (Exc garages & circ space)	Garages	Circ space	Total GIA (inc circ space & garages)	
	Net Area	1.20	hectares				30.00	2,921.0	120.6	128.3	3,169.9	
	Gross Area	1.33	hectares		Market		20.10	2,110.5	120.6	120.6	2,951.7	
	Net to Gross %	90.23%			Affordable		9.90	810.5	-	7.7	818.2	
	Density	25.00	per net ha		% Affordable		33.00%					
Scheme Revenue												
		Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Total No of Units		30.00	20.10	-	-	-	-	6.93	-	-	2.97	-
Total NIA exc garages & circ space (sq m)		2,921.0	2,110.5	-	-	-	-	555.1	-	-	255.4	-
Garages (sq m)		120.6	120.6	-	-	-	-	-	-	-	-	-
Total NIA inc garages exc circ space (sq m)		3,041.6	2,231.1	-	-	-	-	555.1	-	-	255.4	-
Tenure Split (by %)			67.00%					23.10%			9.90%	
Sales Revenue (£)		9,488,970	7,914,375	-	-	-	-	907,830	-	-	666,765	-
Average Revenue per unit		316,299	393,750	-	-	-	-	131,000	-	-	224,500	-
Average Revenue per sq m GIA		3,249	3,750	-	-	-	-	1,635	-	-	2,610	-
Capital Contributions												
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
Total Capital contributions (£)		-										
Total Revenue (£)		9,488,970										
Scheme Development Costs												
Land	598,500	450,000	per gross ha									
SDLT at prevailing rate	19,425											
Agents Fees (1%), Legal Fees (0.75%) Total	10,474											
Land & associated fees Total	628,399	472,480	per gross ha									
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected	
Build Cost (£)	4,184,656	3,001,956	-	-	-	-	819,392	-	-	363,307	-	
Plot costs (£)	281,931	202,249	-	-	-	-	55,204	-	-	24,477	-	
Garage Build Costs (£)	54,270	54,270	-	-	-	-	-	-	-	-	-	
Additional Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-	
Total GIA inc circ space & garages (sq m)	3,049	2,231	-	-	-	-	563	-	-	255	-	
Total Contingency - 0% Build Costs	-	-	-	-	-	-	-	-	-	-	-	
Total Build Cost (£)	4,520,856	3,258,475	-	-	-	-	874,597	-	-	387,784	-	
Policy & Infrastructure Costs												
Total Site Infrastructure Costs	354,427											
Biodiversity (20%) inc. service charge	9,120											
Part M4(2)	42,000											
Part M4(3a) House	11,823											
Part M4(3a) Flat	1,386											
S106 (sites over 10 units)	75,000											
Electric Charging Vehicle	25,950											
RAMS	6,635											
VOIDS (older persons only)	-											
	-											
	-											
	-											
	-											
	-											
	-											
Total Policy & Infrastructure Costs (£)	526,341											
Sales & Marketing/Legal Fees (mkt)	237,431	237,431	-	-	-							
Sales & Marketing/Legal Fees (aff)	4,950						3,465	-	-	1,485	-	
Professional Fees Total (£)	452,086	325,848	-	-	-		87,460	-	-	38,778	-	
CIL (£)	-											
Total Development Costs (£)	6,370,063											
Development Period												
Development Period	6 Quarters											
Debit Interest Rate	7.00%											
Credit Interest Rate	0.00%											
Annual Discount Rate	0.00%											
Notes												
You can add notes here! And they print												
Revenue and Capital Contributions	9,488,970											
Land & associated Fees - inc in interest calc	628,399											
Development Costs	5,741,664											
Finance	206,047											
ADR Cost	0											
Total Dev Costs Inc Finance & ADR Costs	6,576,110											
Gross Residual Value inc land less finance (£)	2,912,860											
Total Developer/Contractor Return	1,479,491											
Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)	1,433,369											

Summary Report 3												
Site Name	Res6a VA: Broads general : 33% AH										Land and Developer Returns Assumptions	
Site Information											Land & associated costs included in cashflow	
											Developer & contractor returns excluded from cashflow	
Date	19/08/2024	Updated		Compiled by	TM	Reference	Res6a					
Summary Details												
					Dwellings	NIA (Exc garages & circ space)	Garages	Circ space	Total GIA (inc circ space & garages)			
	Net Area	1.20	hectares		30.00	2,921.0	120.6	128.3	3,169.9			
	Gross Area	1.33	hectares	Market	20.10	2,110.5	120.6	120.6	2,351.7			
	Net to Gross %	90.23%		Affordable	9.90	810.5	-	7.7	818.2			
	Density	25.00	per net ha	% Affordable	33.00%							
Scheme Revenue												
		Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Total No of Units		30.00	20.10	-	-	-	-	6.93	-	-	2.97	-
Total NIA exc garages & circ space (sq m)		2,921.0	2,110.5	-	-	-	-	555.1	-	-	255.4	-
Garages (sq m)		120.6	120.6	-	-	-	-	-	-	-	-	-
Total NIA inc garages exc circ space (sq m)		3,041.6	2,231.1	-	-	-	-	555.1	-	-	255.4	-
Tenure Split (by %)			67.00%					23.10%			9.90%	
Sales Revenue (£)		9,488,970	7,914,375	-	-	-	-	907,830	-	-	666,765	-
Average Revenue per unit		316,299	393,750	-	-	-	-	131,000	-	-	224,500	-
Average Revenue per sq m GIA		3,249	3,750	-	-	-	-	1,635	-	-	2,610	-
Capital Contributions												
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
Total Capital contributions (£)		-										
Total Revenue (£)		9,488,970										
Scheme Development Costs												
Land	465,500	350,000	per gross ha									
SDLT at prevailing rate	12,775											
Agents Fees (1%), Legal Fees (0.75%) Total	8,146											
Land & associated fees Total	486,421	365,730	per gross ha									
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected	
Build Cost (£)	4,184,656	3,001,956	-	-	-	-	819,392	-	-	363,307	-	
Plot costs (£)	281,931	202,249	-	-	-	-	55,204	-	-	24,477	-	
Garage Build Costs (£)	54,270	54,270	-	-	-	-	-	-	-	-	-	
Additional Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-	
Total GIA inc circ space & garages (sq m)	3,049	2,231	-	-	-	-	563	-	-	255	-	
Total Contingency - 0% Build Costs	-											
Total Build Cost (£)	4,520,856	3,258,475	-	-	-	-	874,597	-	-	387,784	-	
Policy & Infrastructure Costs												
Total Site Infrastructure Costs	354,427											
Biodiversity (20%) inc. service charge	38,160											
Part M4(2)	42,000											
Part M4(3a) House	11,823											
Part M4(3a) Flat	1,386											
S106 (sites over 10 units)	75,000											
Electric Charging Vehicle	25,950											
RAMS	6,635											
VOIDS (older persons only)	-											
	-											
	-											
	-											
	-											
	-											
	-											
Total Policy & Infrastructure Costs (£)	555,381											
Sales & Marketing/Legal Fees (mkt)	237,431	237,431	-	-	-	-	-	-	-	-	-	-
Sales & Marketing/Legal Fees (aff)	4,950	-	-	-	-	-	3,465	-	-	1,485	-	
Professional Fees Total (£)	452,086	325,848	-	-	-	-	87,460	-	-	38,778	-	
CIL (£)	-											
Total Development Costs (£)	6,257,125											
Development Period												
Development Period	6	Quarters										
Debit Interest Rate	7.00%											
Credit Interest Rate	0.00%											
Annual Discount Rate	0.00%											
Notes												
You can add notes here! And they print												
Revenue and Capital Contributions	9,488,970											
Land & associated Fees - inc in interest calc	486,421											
Development Costs	5,770,704											
Finance	197,212											
ADR Cost	0											
Total Dev Costs inc Finance & ADR Costs	6,454,337											
Gross Residual Value inc land less finance (£)	3,034,633											
Total Developer/Contractor Return	1,479,491											
Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)	1,555,142											

Broads Authority Local Plan Viability Assessment Technical Appendices - October 2024

Summary Report 3												
Site Name	Res7b VA: Broads general : 33% AH							Land and Developer Returns Assumptions				
Site Information								Land & associated costs included in cashflow Developer & contractor returns excluded from cashflow				
Date	19/08/2024	Updated		Compiled by	TM	Reference	Res7b					
Summary Details				Dwellings	NIA (Exc garages & circ space)	Garages	Circ space	Total GIA (inc circ space & garages)				
	Net Area	3.33	hectares		100.00	9,368.2	271.8	403.9	10,043.9			
	Gross Area	4.44	hectares	Market	67.00	6,666.5	271.8	378.2	7,316.5			
	Net to Gross %	75.00%		Affordable	33.00	2,701.7	-	25.7	2,727.4			
	Density	30.00	per net ha	% Affordable	33.00%							
Scheme Revenue												
	Total	Market Sale	Not Selected	Not Selected	Self Build	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected	
Total No of Units	100.00	62.00	-	-	5.00	-	23.10	-	-	9.90	-	
Total NIA exc garages & circ space (sq m)	9,368.2	5,966.5	-	-	700.0	-	1,850.3	-	-	851.4	-	
Garages (sq m)	271.8	271.8	-	-	-	-	-	-	-	-	-	
Total NIA inc garages exc circ space (sq m)	9,640.0	6,238.3	-	-	700.0	-	1,850.3	-	-	851.4	-	
Tenure Split (by %)		62.00%			5.00%		23.10%			9.90%		
Sales Revenue (£)	30,379,275	22,374,375	-	-	2,756,250	-	3,026,100	-	-	2,222,550	-	
Average Revenue per unit	303,793	360,877	-	-	551,250	-	131,000	-	-	224,500	-	
Average Revenue per sq m GIA	3,243	3,750	-	-	3,938	-	1,635	-	-	2,610	-	
Capital Contributions												
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
	0	-										
Total Capital contributions (£)	-											
Total Revenue (£)	30,379,275											
Scheme Development Costs												
Land	1,777,600	400,000	per gross ha									
SDLT at prevailing rate	78,380											
Agents Fees (1%), Legal Fees (0.75%) Total	31,108											
Land & associated fees Total	1,887,088	424,637	per gross ha									
	Total	Market Sale	Not Selected	Not Selected	Self Build	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected	
Build Cost (£)	13,470,664	8,626,187	-	-	1,010,810	-	2,660,681	-	-	1,172,986	-	
Plot costs (£)	907,558	581,168	-	-	68,223	-	179,141	-	-	79,027	-	
Garage Build Costs (£)	122,310	122,310	-	-	-	-	-	-	-	-	-	
Additional Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-	
Total GIA inc circ space & garages (sq m)	9,772	6,345	-	-	700	-	1,876	-	-	851	-	
Total Contingency - 0% Build Costs	-											
Total Build Cost (£)	14,500,532	9,329,665	-	-	1,079,033	-	2,839,822	-	-	1,252,013	-	
Policy & Infrastructure Costs												
Total Site Infrastructure Costs	1,140,930											
Biodiversity (20%) inc. service charge	30,400											
Part M4(2)	140,000											
Part M4(3a) House	41,151											
Part M4(3a) Flat	4,620											
S106 (sites over 10 units)	250,000											
Electric Charging Vehicle	86,500											
RAMS	22,117											
Voids (older persons only)	-											
	-											
	-											
	-											
	-											
	-											
Total Policy & Infrastructure Costs (£)	1,715,718											
Sales & Marketing/Legal Fees (mkt)	753,919	671,231	-	-	82,688	-	-	-	-	4,950	-	
Sales & Marketing/Legal Fees (aff)	16,500											
Professional Fees Total (£)	1,477,029	932,966	-	-	134,879	-	283,982	-	-	125,201	-	
CIL (£)	-											
Total Development Costs (£)	20,350,786											
Development Period	3 Years											
Debit Interest Rate	7.00%											
Credit Interest Rate	0.00%											
Annual Discount Rate	0.00%											
Revenue and Capital Contributions	30,379,275											
Land & associated Fees - inc in interest calc	1,887,088											
Development Costs	18,463,698											
Finance	388,460											
ADR Cost	0											
Total Dev Costs Inc Finance & ADR Costs	20,739,246											
Gross Residual Value inc land less finance (£)	9,640,029											
Total Developer/Contractor Return	4,712,778											
Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)	4,927,251											
Notes	You can add notes here! And they print											

Summary Report 3											
Site Name	OP1 Brownfield VA: Broads general : 33% AH										Land and Developer Returns Assumptions Land & associated costs included in cashflow Developer & contractor returns excluded from cashflow
Site Information											
Date	19/08/2024	Updated		Compiled by	TM	Reference	DP1 Brownfield				
Summary Details					Dwellings	NIA (Exc garages & circ space)	Garages	Circ space	Total GIA (inc circ space & garages)		
	Net Area	0.50	hectares		50.00	3,250.0	-	1,083.3	4,333.3		
	Gross Area	0.50	hectares	Market	33.50	2,177.5	-	725.8	2,903.3		
	Net to Gross %	100.00%		Affordable	16.50	1,072.5	-	357.5	1,430.0		
	Density	100.00	per net ha	% Affordable	33.00%						
Scheme Revenue											
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Total No of Units	50.00	33.50	-	-	-	-	11.55	-	-	4.95	-
Total NIA exc garages & circ space (sq m)	3,250.0	2,177.5	-	-	-	-	750.8	-	-	321.8	-
Garages (sq m)	-	-	-	-	-	-	-	-	-	-	-
Total NIA inc garages exc circ space (sq m)	3,250.0	2,177.5	-	-	-	-	750.8	-	-	321.8	-
Tenure Split (by %)		67.00%					23.10%			9.90%	
Sales Revenue (£)	12,747,215	10,442,788	-	-	-	-	1,224,300	-	-	1,080,127	-
Average Revenue per unit	254,944	311,725	-	-	-	-	106,000	-	-	218,208	-
Average Revenue per sq m GIA	3,922	4,796	-	-	-	-	1,631	-	-	3,357	-
Capital Contributions											
	0	-									
	0	-									
	0	-									
	0	-									
	0	-									
	0	-									
	0	-									
Total Capital contributions (£)		-									
Total Revenue (£)	12,747,215										
Scheme Development Costs											
Land	225,000	450,000	per gross ha								
SDLT at prevailing rate	-										
Agents Fees (1%), Legal Fees (0.75%) Total	3,938										
Land & associated fees Total	228,938	457,876	per gross ha								
	Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Build Cost (£)	8,185,242	5,484,112	-	-	-	-	1,890,791	-	-	810,339	-
Plot costs (£)	551,460	369,478	-	-	-	-	127,387	-	-	54,595	-
Garage Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-
Additional Build Costs (£)	-	-	-	-	-	-	-	-	-	-	-
Total GIA inc circ space & garages (sq m)	4,333	2,903	-	-	-	-	1,001	-	-	429	-
Total Contingency - 0% Build Costs	-	-	-	-	-	-	-	-	-	-	-
Total Build Cost (£)	8,736,702	5,853,590	-	-	-	-	2,018,178	-	-	864,933	-
Policy & Infrastructure Costs											
Total Site Infrastructure Costs	693,264										
Biodiversity (20%) inc. service charge	15,200										
Part M4(2)	-										
Part M4(3a) House	-										
Part M4(3a) Flat	-										
S106 (sites over 10 units)	125,000										
Electric Charging Vehicle	43,250										
RAMS	11,059										
Voids (older persons only)	100,000										
	-										
	-										
	-										
	-										
	-										
	-										
Total Policy & Infrastructure Costs (£)	987,773										
Sales & Marketing/Legal Fees (mkt)	313,284	313,284	-	-	-						
Sales & Marketing/Legal Fees (aff)	8,250						5,775	-	-	2,475	-
Professional Fees Total (£)	873,670	585,359	-	-	-		201,818	-	-	86,493	-
CIL (£)	-										
Total Development Costs (£)	11,148,617										
Development Period: 4 Years											
Debit Interest Rate	7.00%										
Credit Interest Rate	0.00%										
Annual Discount Rate	0.00%										
Notes											
You can add notes here! And they print											
Revenue and Capital Contributions	12,747,215										
Land & associated Fees - inc in interest calc	228,938										
Development Costs	10,919,679										
Finance	1,243,410										
ADR Cost	0										
Total Dev Costs Inc Finance & ADR Costs	12,392,027										
Gross Residual Value inc land less finance (£)	355,188										
Total Developer/Contractor Return	1,965,753										
Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)	-1,610,566										

Summary Report 3												
Site Name	OP1 Brownfield VA: Waterfront : 33% AH										Land and Developer Returns Assumptions	
Site Information											Land & associated costs included in cashflow	
											Developer & contractor returns excluded from cashflow	
Date	19/08/2024	Updated		Compiled by	TM	Reference	DP1 Brownfield					
Summary Details						Dwellings	NIA (Exc garages & circ space)	Garages	Circ space	Total GIA (inc circ space & garages)		
	Net Area	0.50	hectares			50.00	3,250.0	-	1,083.3	4,333.3		
	Gross Area	0.50	hectares	Market		33.50	2,177.5	-	725.8	2,903.3		
	Net to Gross %	100.00%		Affordable		16.50	1,072.5	-	357.5	1,430.0		
	Density	100.00	per net ha	% Affordable		33.00%						
Scheme Revenue												
		Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Total No of Units		50.00	33.50	-	-	-	-	11.55	-	-	4.95	-
Total NIA exc garages & circ space (sq m)		3,250.0	2,177.5	-	-	-	-	750.8	-	-	321.8	-
Garages (sq m)		-	-	-	-	-	-	-	-	-	-	-
Total NIA inc garages exc circ space (sq m)		3,250.0	2,177.5	-	-	-	-	750.8	-	-	321.8	-
Tenure Split (by %)			67.00%					23.10%			9.90%	
Sales Revenue (£)		16,203,904	13,575,456	-	-	-	-	1,224,300	-	-	1,404,148	-
Average Revenue per unit		324,078	405,238	-	-	-	-	106,000	-	-	283,666	-
Average Revenue per sq m GIA		4,986	6,234	-	-	-	-	1,631	-	-	4,364	-
Capital Contributions		0	-									
		0	-									
		0	-									
		0	-									
		0	-									
		0	-									
		0	-									
Total Capital contributions (£)		-	-									
Total Revenue (£)		16,203,904										
Scheme Development Costs												
Land		360,000	720,000	per gross ha								
SDLT at prevailing rate		7,500										
Agents Fees (1%), Legal Fees (0.75%) Total		6,300										
Land & associated fees Total		373,800	747,600	per gross ha								
		Total	Market Sale	Not Selected	Not Selected	Not Selected	Social Rent	Affordable Rent	Not Selected	Not Selected	Shared Ownership	Not Selected
Build Cost (£)		8,185,242	5,484,112	-	-	-	-	1,890,791	-	-	810,339	-
Plot costs (£)		551,460	369,478	-	-	-	-	127,387	-	-	54,595	-
Garage Build Costs (£)		-	-	-	-	-	-	-	-	-	-	-
Additional Build Costs (£)		-	-	-	-	-	-	-	-	-	-	-
Total GIA inc circ space & garages (sq m)		4,333	2,903	-	-	-	-	1,001	-	-	429	-
Total Contingency - 0% Build Costs		-	-	-	-	-	-	-	-	-	-	-
Total Build Cost (£)		8,736,702	5,853,590	-	-	-	-	2,018,178	-	-	864,933	-
Policy & Infrastructure Costs												
Total Site Infrastructure Costs		693,264										
Biodiversity (20%) inc. service charge		15,200										
Part M4(2)		-										
Part M4(3a) House		-										
Part M4(3a) Flat		-										
S106 (sites over 10 units)		125,000										
Electric Charging Vehicle		43,250										
RAMS		11,059										
Voids (older persons only)		100,000										
		-										
		-										
		-										
		-										
		-										
		-										
Total Policy & Infrastructure Costs (£)		987,773										
Sales & Marketing/Legal Fees (mkt)		407,264	407,264	-	-	-						
Sales & Marketing/Legal Fees (aff)		8,250						5,775	-	-	2,475	-
Professional Fees Total (£)		873,670	585,359	-	-	-		201,818	-	-	86,493	-
CIL (£)		-										
Total Development Costs (£)		11,387,459										
Development Period		4 Years										
Debit Interest Rate		7.00%										
Credit Interest Rate		0.00%										
Annual Discount Rate		0.00%										
Revenue and Capital Contributions		16,203,904										
Land & associated Fees - inc in interest calc		373,800										
Development Costs		11,013,659										
Finance		1,022,110										
ADR Cost		0										
Total Dev Costs Inc Finance & ADR Costs		12,409,569										
Gross Residual Value inc land less finance (£)		3,794,335										
Total Developer/Contractor Return		2,533,412										
Gross Residual Value inc land less finance (£) less Dev & Cont Returns (£)		1,260,923										
Notes		You can add notes here! And they print										

List of appendices

List of appendices in this report

Appendix I – National policy and guidance

Appendix II – Notes from the developer workshop

Appendix III – Sample house price data

Appendix IV – Building and construction costs

Appendix V – Results sheets

Appendix VI – Sample summary appraisals