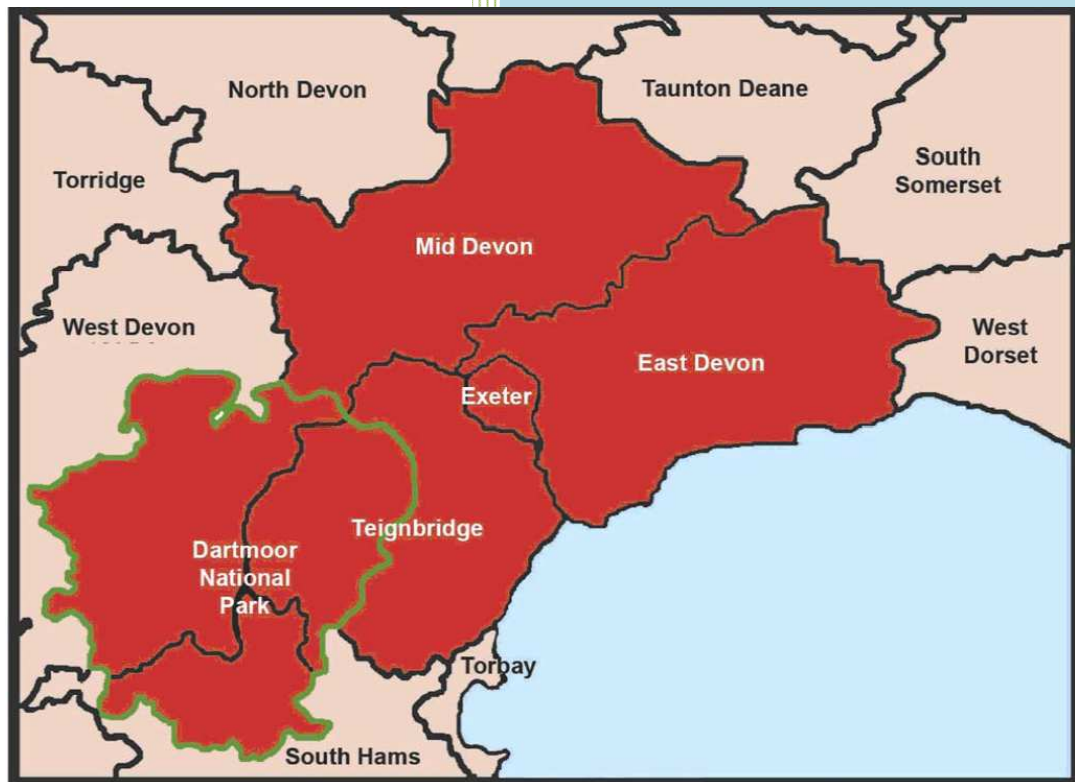


Exeter Housing Market Area

SHLAA Methodology



Adopted September 2013



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1.0 Introduction

- 1.1 Strategic Housing Land Availability Assessments (SHLAAs) are studies that form part of the evidence base for the preparation of Local Plans. They help identify potential sites that may be deliverable and developable for new housing over a period that looks forward over the next 15 years (or the period of the Local Plan).
- 1.2 The local authorities within the Exeter housing market area (Teignbridge, Mid Devon, East Devon and Exeter, with the addition of Dartmoor) have worked together since 2007 to produce a methodology for undertaking SHLAAs. This methodology is jointly published and was previously revised in 2011. This 2013 version updates the document again, in order to reflect national changes in planning policy and guidance.

2.0 About the Strategic Housing Land Availability Assessment (SHLAA)

- 2.1 A Strategic Housing Land Availability Assessment (SHLAA) is an assessment of land in a specific area that is likely to be available and capable of development for new housing within a certain timeframe. The period covered by SHLAA is typically 15 years (or the period of the Local Plan), beginning from the following April. The SHLAA has two purposes, first, it identifies suitable sites with potential for housing, investigates their housing potential and assesses whether they are likely to be developed (i.e. assessing suitability, availability and achievability). Second, the SHLAA assesses the five year supply of deliverable sites, a key requirement under national policy and also enables the local authority to set out a housing trajectory for the plan period.
- 2.2 The assessment of sites for new housing through the SHLAA process and the identification of potential housing sites in the SHLAA report does not indicate that the sites will be allocated for new housing within a Local Plan or be granted planning permission. The SHLAA instead forms part of the evidence base to inform plan-making. Any sites deemed suitable, available and achievable by the SHLAA process will still be subject to public consultation, sustainability appraisal and independent examination if they are taken forward through the Local Plan preparation process. However, the SHLAA may be a material consideration in the determination of planning proposals.

3.0 National policy and guidance

- 3.1 The National Planning Policy Framework (NPPF) requires local planning authorities to significantly boost the supply of housing. The NPPF states in paragraph 47, that local authorities should:
 - *'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*

- *identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;*
- *identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;*
- *for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target.'*

3.2 Preparation of a SHLAA is one means by which local authorities achieve these objectives along with undertaking a Strategic Housing Market Assessment (SHMA). Detailed guidance on how local planning authorities should undertake the assessment is set out in the government's *Strategic Housing Land Availability Assessments: Practice Guidance*. This joint methodology is to be read alongside the national guidance, and does not reiterate advice already provided. However, Lord Matthew Taylor's *External Review of Planning Practice Guidance*, undertaken in December 2012, states that the SHLAA practice guidance is out of date and a priority for review. The Taylor Review recommends that any revisions to practice guidance be undertaken by July 2013. Therefore, in the outcome of significant changes being made to national guidance, this document may be subject to further revision.

3.3 National policy also advises that local authorities should work together, to ensure a joined-up and robust approach. However, since the timescales for the preparation of development plans by local authorities differs, completion of a single SHLAA covering all partners is not practicable. Instead, to ensure a common approach for the preparation of SHLAA, a joint methodology has been adopted between the partner authorities of the Exeter Housing Market Area. Each authority then undertakes the SHLAA process individually, in accordance with this methodology.

3.4 To aid local implementation of SHLAA, this methodology provides further detail on a number of additional matters including:

- Participation of key stakeholders in the process
- A minimum site size threshold
- A method for estimating the housing potential for each identified potential site
- Two models for calculating site commencements and build out rates
- Details of information to be included in the SHLAA report

4.0 The SHLAA Panel

- 4.1 Integral to the preparation of SHLAA is a ‘panel’ of key stakeholders who have a recognised interest in the development of land for housing. Membership of the panel is representative of the broad cross-section of the housing building industry, including housebuilders (volume and smaller scale schemes), social landlords, local property agents and other related professions, local community representatives and other agencies. Local community representatives may be elected members or representatives of local community or voluntary organisations.
- 4.2 Many panel members will have knowledge across the whole SHLAA area, and can advise all the local authorities within the partnership area. However, sometimes a different representative from the same organisation will attend instead of the named attendee, in order to provide more locally specific knowledge, depending on which local authority is holding the meeting. Each local authority convenes their own meetings of the SHLAA panel, and in certain circumstances joint meetings may be held between local authority partners.
- 4.3 The panel operates in an advisory capacity, making use of their specialist knowledge. Local authorities will identify whether sites are ‘available’ and ‘suitable’, and the panel will then advise on ‘achievability’. Panel members such as the Environment Agency and Natural England will also advise further on suitability of sites if required. The expertise and knowledge of panel members is important in helping the partner local authorities identify deliverable and developable sites which can contribute to the supply of housing. Panel members are not precluded from commenting on sites they have an interest in, however, they are required to declare an interest if they have a site under consideration. For further details on how the panel operates or to obtain a copy of its constitution and terms of reference please contact the named local authority planner for that partnership area (see section 11 for details).

5.0 Role of the local authority – assessing ‘suitability’ and ‘availability’

- 5.1 A wide variety of sources will be used to identify potential sites. An exhaustive list of potential sources is set out within the Government’s practice guidance. However, one of the principal methods for identifying such sites will be a public consultation exercise, undertaken by each partner authority. The ‘call for sites’ will be targeted at landowners, agents, developers and town and parish councils to identify sites that are not currently within the planning process. Other known sites will be included, such as existing allocations, current/lapsed planning permissions, draft allocations etc. In addition, a press release will be made available to draw attention to the process. Partner authorities can opt to set out in their SHLAA Report which sites were identified from which sources.

Minimum site size for inclusion

- 5.2 Whilst recognising that a significant amount of new housing delivery takes place on small sites, the partner authorities recognise that surveying all sites (particularly where a large number are small) will be a resource-intensive process. In order to strike a balance between work that is feasible and the consideration of small sites through the SHLAA, a minimum site

size threshold will be set. This will be applied without exception by all partners. The threshold is:

- 5 dwellings (gross) or 0.15 hectares.

5.3 Smaller sites of 1-4 dwellings will not be surveyed, but where planning permission has been granted these will be summarised and assumed to be available, suitable and achievable, and included in the SHLAA Report’s housing trajectory of potential housing delivery.

Visiting sites

5.4 Ideally, all sites that meet the inclusion criteria should be visited. However, this may not be possible given the resources available, particularly if a significant number of sites are identified. Sites that have planning permission may not need a visit, if the necessary information can be obtained from planning and building control records.

5.5 Site surveys are to be undertaken by officers from the respective local authority. Panel members may also undertake site visits in order to provide detailed advice on the potential deliverability and developability of sites. A common pro forma to record site suitability will be used by all partner authorities. A copy can be obtained by contacting the relevant local authority SHLAA contact (for details see section 11).

Estimating housing potential for each site

5.6 The whole area of a proposed site may not all be developable for housing. This is because the area for housing development on larger sites may be reduced through the provision of access roads, strategic open space or landscaping. The development potential of individual sites may also be affected by constraints such as biodiversity conservation, protected trees or the presence of heritage assets.

5.7 To reflect the realistic developable site area, indicative ‘gross to net ratios’ will be applied to all sites. Exceptions to this rule will only be acceptable where evidence justifies an alternative ratio (such as through testing against similar locations) or on advice from the SHLAA panel. The ratios to be used are:

Site size	Gross to net ratio
Up to 0.4 hectare	100%
0.4 to 2 hectares	80%
2 hectares and above	60%

5.8 In order to calculate the potential housing yield for each site, density assumptions will be applied to the net developable area. These assumptions should be applied unless a partner authority has set their own density standards to reflect local circumstances or specific site

characteristics. Variations to the density assumptions will need to be justified by the respective partner authority. The recommended assumptions are:

Location	Density (dwellings per hectare, net)
City centre	101 and over
Town centre / planned urban extension	51 to 100
New community	As yet undetermined – to be resolved through development plan policy
Suburban / rural settlement	30 to 50

5.9 Each partner will make clear in the SHLAA report where these locations apply in its area.

Assessing suitability for housing

5.10 A site is suitable for development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities that are within or adjacent to existing settlements. A two stage approach is applied to determining whether potential sites are in suitable locations for housing development. The following locations will be considered unsuitable and removed from the process under Stage A:

Stage A assessment criteria	
Locations considered to be unsuitable for housing development	Justification
Site and potential scale of development for housing does not accord with strategically appropriate locations through: <ul style="list-style-type: none"> • The Development Plan (e.g. saved policies, published, submitted or adopted Local Plan), or • National guidance on the sustainable location of development 	Development in locations unrelated to settlements defined through existing/emerging development plan policies may not contribute towards the creation of sustainable, mixed communities.

Where the majority of the site ¹ impacts upon the following designated sites of biodiversity or geodiversity importance: <ul style="list-style-type: none"> • Site of Special Scientific Interest (SSSI) • Special Area of Conservation (SAC) • Ramsar site (wetlands of international importance) • Special Protection Area (SPA) 	National policy advises against development that would have an adverse impact on national and internationally important nature and geology conservation interests.
Flood risk zone 3	Comprises land within the functional floodplain or land at high probability of flooding.

5.11 Sites that have been deemed suitable under Stage A will then be considered against further criteria within Stage B. The site criteria take into account policy restrictions, physical problems or limitations, potential impacts, and the environmental conditions which would be experienced by prospective residents. While the local authority will conduct the initial assessments of site suitability, specialist advice of the Environment Agency and Natural England may alter the local authority's conclusions regarding environmental impacts.

Stage B assessment criteria	
Potential for impact on: <ul style="list-style-type: none"> • Biodiversity, the historic, cultural and built environment • Landscape character • Mineral resources • Air quality • Water Source Protection Zones • Open space and recreation facilities • Employment land 	Other considerations: <ul style="list-style-type: none"> • Access to public transport, services and facilities • Highway access, pedestrian and cycle links • Land status • Constraints to delivery, including flood risk • Infrastructure capacity • Compatibility with existing and/or proposed surrounding uses

5.12 Sites allocated in existing plans for housing or with planning permission for housing will be regarded as suitable unless there have been subsequent changes in circumstances which may

¹ Very large sites may include a portion of sites with Stage A constraints, and such cases the developable area or yield should be modified.

affect this position. Where access to a site relies upon third party land that does not form part of another SHLAA site with identified housing potential, it will be regarded as undeliverable. A standard pro forma will be used by all partner authorities to assess suitability.

Assessing availability for housing

- 5.13 Sites brought forward during a call for sites, including those nominated by any landowner/agent/developer or the planning authority, need to be confirmed as available by the landowner/agent via a Housing Site Proforma. Sites with planning permission subject to the completion of a S106 agreement will be assumed to be available unless the local authority has knowledge to the contrary or following advice of the panel. Further investigation may also identify legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners which could affect genuine availability.

Determining housing potential of windfall sites

- 5.14 Local authorities may make an allowance for windfall sites if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Where such circumstances exist, and where there is a likely insufficient number of dwellings through the SHLAA to meet development plan provision totals, a windfall allowance may be used.
- 5.15 To determine the level of windfall allowance, an estimate will be made of the housing potential from each likely source of land for housing through reference to past completion rates from local authority monitoring data. To estimate the potential from each source the average annual completion rate from the source will be calculated, taking care to avoid double counting sites and coming to an informed view as to:
- Whether the annual rate is likely to increase or decrease
 - Whether the pattern of redevelopment is likely to remain the same, grow or decline
 - Whether current market conditions are likely to stay the same, worsen or improve in the future

6.0 Role of the SHLAA panel – assessing ‘achievability’

- 6.1 It is primarily at this stage that the panel provide their input, this forming a significant element of the overall SHLAA process. It is the role of the panel to advise on the ‘achievability’ of each site based on the information supplied by the local authority collated through the earlier stages of the process. The local authority partners should inform the panel whether there are known to be abnormal costs relating to infrastructure, and what requirements may exist for the provision of affordable housing, open space and other community facilities or biodiversity considerations to make development acceptable in sustainability terms. The panel will advise whether a potential site can be determined achievable by there being a reasonable prospect

that housing will be developed on the site at a particular time. The panel may also wish to adjust the housing yield for sites due to constraints or advice on the likely number of dwellings that can be accommodated.

- 6.2 Each partner authority may choose to supplement panel responses through the use of viability modelling, and/or advice from other sources where this may be relevant to help determine whether housing is an economically viable prospect for a particular site. Each authority may also examine the robustness of the findings through testing against alternative delivery scenarios.
- 6.3 The panel and local authority will work together to consider ways to overcome constraints where they have been identified as preventing a site from being currently deliverable or developable. Due to the complexity of issues and variations between districts it is difficult to specify a set approach and each partner authority must work with the consultees and other partners to consider the best course of action. Achieving a consistent approach will be important where possible.

7.0 Calculating delivery rates of housing sites

- 7.1 To support the role of the SHLAA panel, and to subsequently enable calculation of the housing trajectory and five year housing supply, a model is used to set out the commencement and build out rate of sites. A 15 year period is used to set out the delivery period of all housing sites, which begins from the April of the year following the SHLAA or SHLAA review. The calculation is applied to those housing sites deemed suitable, available and achievable. Sites stipulated by the panel as unachievable are not included. The adopted approach gives regard to the capacity of the development industry to build, reflected through past rates of completion and the need for the industry to respond to increased future rates of delivery to meet likely future strategic planning provision requirements.
- 7.2 Two calculation models have been agreed by the joint local authorities and their SHLAA panels for the timescales within which sites are anticipated to be delivered. The 'standard model' was originally developed before the recession of 2008, whilst the 'market conditions model' reflects the current economic conditions. The market conditions model reduces the build out rate for all dwellings during periods where the panel and local authority agree market conditions warrant. This approach recognises the difficulties arising for developers to secure finances for development of sites and to sell completed dwellings. Where there are known time constraints to delivery, the panel may choose to assume a later commencement. Similar adjustments can be taken to build out rates if the panel is aware of circumstances likely to affect the rate particular sites are constructed.
- 7.3 The standard and market conditions models, stipulating the commencement dates and build out rates can be found in appendices 1 and 2 respectively. A worked example spreadsheet that applies the market condition model can be found in appendix 3.

8.0 The SHLAA Report

8.1 Each local authority will produce a report upon completion of the assessment which will form part of the local evidence base. The report will include:

- A detailed assessment for each potential site, cross referenced to a map / plan showing the location and boundary of the site.
- A spreadsheet listing all potential sites presenting the potential commencement of housing development and build out on an annual basis, grouped in five year tranches
- An indicative housing trajectory showing potential delivery each year on sites deemed suitable, available and achievable
- Whether a windfall allowance has been included
- Details of residual valuation models used to supplement panel responses on achievability (if applicable)

8.2 Paragraph 47 of the NPPF requires local authorities to identify and update annually a supply of sites for five years worth of their housing requirements. Each partner authority will use its SHLAA to review and update its calculation of the 5 year supply, which provides a 5 year look forward from April in the following year (i.e. years 1-5 of the SHLAA delivery period). Each partner authority will include the calculation for the 5 year supply and the housing trajectory within their Annual Monitoring Reports.

9.0 Reviewing the assessment

9.1 The SHLAA will need to be reviewed in whole, or in part, on a regular basis. Dependent on circumstances and resources available, this may take place annually or after another period specified in the partner authority's most recent SHLAA report. A full SHLAA review may require a new call for sites, whilst a part review will only require an updating of the SHLAA report.

9.2 Both a full or part review of the assessment will provide an update on the availability and achievability of sites in the SHLAA, including an evaluation of any changes in circumstances. The following information should be recorded:

- Whether sites have been completed or are under construction
- Whether sites are the subject of planning applications or permissions
- Progress which has been made on removing constraints to development and the achievability of sites
- The identification of any new constraints
- Whether any previously unidentified sites have come forward that were not included in the SHLAA but meet the minimum site size threshold (i.e. 5 dwellings / 0.15ha)
- Summaries of small sites below the 5 dwellings / 0.15ha threshold to provide important monitoring information on windfalls which can be used to inform revisions of SHLAA

9.3 It may be necessary to allocate new sites for housing in order to maintain a five year supply of specific deliverable sites. To keep the land supply up to date, and inform any reviews of a Local Plan, a full SHLAA review will need to be undertaken repeating the call for sites and a more comprehensive survey.

9.4 If the assessment or subsequent reviews highlight that insufficient sites have been identified to meet development plan targets, a ‘broad locations’ approach can be taken, which will locate general directions of growth for new development. If this approach is taken it will need to be justified in the SHLAA report and any estimates of potential housing supply will need to have regard to the nature and scale of opportunities within the area identified and market conditions.

10.0 Joint documentation

10.1 Each partner authority will seek to use the same documentation format throughout the SHLAA process to ensure consistency of approach. The following list sets out the common documents that are in use by all the partner authorities:

- Potential Housing Site Pro Forma (New Sites)
- Potential Housing Site Pro Forma (Availability Review)
- Site Suitability Appraisal Pro Forma
- Spreadsheet for presentation of potential sites
- SHLAA Panel constitution and terms of reference

10.2 Copies of the documentation are available on request from the each partner authority’s SHLAA contact. Their contact details are below.

11.0 Partner authority SHLAA contacts

11.1 Should you require further information about any aspect of the joint SHLAA methodology or individual SHLAAs undertaken by local authorities, please contact the following:

Local authority	Name and role	Telephone number	Email address
Dartmoor National Park Authority	David Lillington, Forward Planner	01626 832093	dlillington@dartmoor-npa.gov.uk
East Devon District Council	Ross Sutherland, Planning Policy Officer	01395 517483	rsutherland@eastdevon.gov.uk
Exeter City Council	Katharine Smith, Forward Planning Officer	01392 265283	katharine.smith@exeter.gov.uk
Mid Devon District Council	Dean Titchener, Forward Planning Officer	01884 234334	dean.titchener@middevon.gov.uk
Teignbridge District Council	Mary Elkington, Growth Point Officer	01626 215466	mary.elkington@teignbridge.gov.uk

Appendix 1: Standard model for calculating housing delivery rates

Size of site (no. of dwellings)	Commencement of sites			Build out rate
	Sites where dwellings are under construction	Sites where dwellings have planning permission	Suitable sites without planning permission	
1-15 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 1	Commence in Year 3	1 st year - 25 dwellings maximum 2 nd year onward - 50 dwellings per year maximum
16-500 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 2	Commence in Year 3	1 st year - 25 dwellings maximum 2 nd year onward - 50 dwellings per year maximum
501-1000 dwellings (assumes two developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 st year - 25 dwellings maximum 2 nd year onward - 100 dwellings per year maximum
1001+ dwellings (assumes three developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 st year - 25 dwellings maximum 2 nd year onward - 150 dwellings per year

NB. These figures provide a general guideline. Different commencement dates or build out rates may be chosen for selected sites by the SHLAA panel if warranted due to site specific issues, or if landowners have identified sites as being available at a later date.

Appendix 2: Market conditions model for calculating housing delivery rates

Size of site (no. of dwellings)	Commencement of sites			Build out rate	
	Sites where dwellings are under construction	Sites where dwellings have planning permission	Suitable sites without planning permission	Years 1-5	Years 6+
1-15 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 1	Commence in Year 3	1 st year - 12 dwellings maximum 2 nd year onward - 25 dwellings per year maximum	1 st year - 25 dwellings maximum 2 nd year onward - 50 dwellings per year maximum
16-500 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 2	Commence in Year 3	1 st year - 12 dwellings maximum 2 nd year onward - 25 dwellings per year maximum	1 st year - 25 dwellings maximum 2 nd year onward - 50 dwellings per year maximum
501-1000 dwellings (assumes two developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 st year - 12 dwellings maximum 2 nd year onward - 50 dwellings per year maximum	1 st year - 25 dwellings maximum 2 nd year onward - 100 dwellings per year maximum
1001+ dwellings (assumes three developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 st year - 12 dwellings maximum 2 nd year onward - 75 dwellings per year	1 st year - 25 dwellings maximum 2 nd year onward - 150 dwellings per year

NB. These figures provide a general guideline. Different commencement dates or build out rates may be chosen for selected sites by the SHLAA panel if warranted due to site specific issues, or if landowners have identified sites as being available at a later date.

Appendix 3: Worked example spreadsheet

Applying the market conditions model to calculate commencements and build out rates over the 15 year SHLAA period.

SHLAA site ref / planning application ref	Address	Net Site Area (ha)	Min Yield	Max Yield	Yield Mid Point	Suitable	Available	Achievable	2013/14	2014/15	2015/16	2016/17	2017/18	Yield Yrs 1-5	2018/19	2019/20	2020/21	2021/22	2022/23	Yield Yrs 6-10	2023/24	2024/25	2025/26	2026/27	2027/28	Yield Yrs 11-15	15 years +	Running total	Constraints to development or reasons for exclusion	Potential for constraints to be overcome	Comments
SHLAA/1	East Brook	65	1000	1500	1500	✓	✓	X						0						0						0	0	Infrastructure costs are high			
SHLAA/2	Lea Meadow	8.2	287	451	300	✓	✓	✓			12	25	25	62	50	50	50	50	38	238						0	300				
SHLAA/3	Long Barracks	6	210	330	200	✓	✓	✓						0	25	50	50	50	25	200						0	200	Concerns over infrastructure	Policies are flexible and allows for negotiation		
SHLAA/4	Court Acre	3.84	134	211	173	✓	✓	✓			12	25	25	62	50	50	11			111						0	173				
11/10001/FUL	Hilltop Close	0.32	11	18	14	✓	✓	✓	12	2				14						0						0	14			PP granted for 14d	
12/12001/FUL	Coombe Tracy	3	105	165	135	✓	✓	✓	12	25	25	25	25	87	48					48						0	135			PP granted for 135d	
12/12151/FUL	The Haywain	0.3	10	17	13	✓	✓	✓	12	1				13						0						0	13			PP granted 13d	
13/00012/FUL	Fearnly Drive	0.5	15	25	20	✓	✓	✓	12	8				20						0						0	20			PP granted for 20d	
11/01025/FUL	Gold Road	1.12	39	62	50	✓	✓	✓	12	25	13			50						0						0	50			Site under construction	
11/11217/FUL	Small Street	8.5	300	460	380	✓	✓	✓	12	25	25	25	25	112	50	50	50	18		168						0	280			Site under construction	
11/01088/FUL	Castle Avenue	0.72	25	40	32	✓	✓	✓	12	20				32						0						0	32			Site under construction	
12/15113/FUL	Phoenix Garage	0.24	8	13	11	✓	✓	✓	11					11						0						0	11			Site under construction	