West Northamptonshire Joint Strategic Housing Land Availability Assessment (SHLAA)

2009-2011 Update

Background Paper

West Northamptonshire Joint Planning Unit
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1. Introduction and Policy Context:

1.1. The West Northamptonshire Joint Planning Unit commenced production of a Strategic Housing Land Availability Assessment (SHLAA) in mid-2008. The requirement to undertake a SHLAA is set out by Planning Policy Statement 3: Housing (PPS3). The provisions in PPS3 aim to improve the affordability and supply of housing in all communities, particularly by ensuring that land availability is not a constraint on the delivery of new homes. The emerging changes to the national planning system currently indicate that a SHLAA will continue to be required into the future. The SHLAA has been provided for the West Northamptonshire Housing Market Area (WNHMA), which was identified within the East Midlands Regional Spatial Strategy (RSS8). The WNHMA covers Daventry District, Northampton Borough and South Northamptonshire District. A Strategic Housing Market Assessment (SHMA) has been prepared jointly by the Local Planning Authorities within this area, as part of a requirement under PPS3 to provide insight as to how the markets operate at a sub-regional level. This provides a starting point to assess housing need, demand and market conditions within the local area. Some of the key conclusions from the SHMA have been essential in shaping the geography and delivery requirements covered by the SHLAA. Taken together, the SHMA and SHLAA aim to support the robust evidence-base that is required to inform Local Development Documents and aid the formulation of local planning policies, land allocations and ultimately the determination of planning applications.

1.2. A ‘plan, monitor, manage’ approach has been developed to support Local Planning Authorities in maintaining a supply of land for housing and achieving required delivery. In order to achieve this, Planning Policy Statement 3: Housing (paragraphs 54 – 59) requires Local Planning Authorities to:

• Identify specific, deliverable sites for the first 5 years of a plan that are ready for development;
• Identify specific developable sites for years 6-10;
• Indicate either specific developable sites or broad locations for future growth for years 11-15;
• Not include an allowance for windfalls in the first 10 years of the plan unless there are justifiable local circumstances that prevent sites being identified.

1.3. The SHLAA is prepared against this framework to demonstrate that sufficient developable land can be identified for at least a 15 year period. This is necessary to provide a degree of certainty over housing delivery in future Local Development Documents. The SHLAA specifically identifies sites with the potential for housing, evaluates their housing potential and assesses when they are likely to be developed. Evidence within the SHLAA is then monitored to highlight any changing trends in land availability over the plan period.

1.4. The West Northamptonshire SHLAA is conducted using a methodology in accordance with ‘PPS3: Housing and Strategic Housing Land Availability: Practice Guidance’ (2007). The SHLAA is a technical document only and the identification of a specific site in the assessment does not mean that the site will be allocated for housing development or given planning permission. An extensive range of sites with the potential for housing are identified in the assessment and this evidence helps inform the future pattern of development and the allocation of land for housing when developing policies in Local Development Documents. The statutory plan-making process will further assess the
suitability of sites, including holding them to detailed evaluation against National (and if applicable Regional) policy before determining allocations.

1.5. An important stage of the process was reached in December 2009 with the publication of a draft version of the SHLAA evidence highlighting sites with housing potential in West Northamptonshire. The base date for the planning and development information in the original site assessments was 1st April 2008. A ‘Call for Further Technical Evidence’ exercise was conducted between 17th December 2009 and 11th February 2010.

1.6. The information released during this exercise, including the Draft Report, Methodology and Schedule of Site Assessments (including mapping) is still available through the Joint Planning Unit Website. These documents provide substantially more information on the SHLAA process than the summary given above.

1.7. This background paper summarises the extensive further work which has been conducted since December 2009 in preparing the Final SHLAA for West Northamptonshire. Where necessary further advice has been sought and the SHLAA Methodology adapted to accommodate a revised assessment of housing potential. This paper aims to aid understanding of how the final assessment of housing potential has been made for West Northamptonshire and how this has positively been taken forward from the December 2009 publication. A separate paper, the ‘SHLAA Methodology Update: December 2011’ details the specific changes to the site assessment process.

1.8. These two documents support the final schedule of SHLAA Site Assessments that have now been published to support further preparation of the West Northamptonshire Joint Core Strategy and other Local Development Documents. They also provide a justification of where, how and why the assessment process has been updated from the April 2008 baseline to the April 2011 position. Progression of the SHLAA is detailed in chronological order as far as possible.

2. Summary of the December 2009 ‘Call for Technical Evidence’ Exercise

2.1. The SHLAA ‘Call for Further Technical Evidence’ exercise provided an opportunity for public, stakeholder and development industry engagement around the SHLAA. It provided a valuable source of supplementary evidence on the deliverability / developability of identified sites (in terms of the suitability, availability and achievability of development) and sought to update information from the April 2008 baseline where necessary and appropriate. The exercise provided site-specific data with respondents encouraged to update information about particular sites. The Joint Planning Unit has looked to make the maximum use of all responses, and where comments have been received regarding the site assessment process more generally these have also been considered.

2.2. In total, 4085 responses were received during the December 2009 call for further technical evidence, including 1078 responses to the SHLAA website and 3007 through paper correspondence. A significant proportion of the public responses were in the form of circular and / or standard responses drafted by community groups to raise concerns against a range of sites and the plan-making process more generally (see below). A significant amount of time has been spent analysing these responses and beginning work to assess how they may have changed the suitability, availability and achievability of sites. The initial stage involved breaking full responses down to itemised comments, which totalled 23,438 individual comments. All comments were considered in the initial analysis of the exercise.
response to obtain the best possible indication of how well the SHLAA had identified the potential housing capacity in West Northamptonshire.

2.3. The SHLAA exercise ran less than 2 months after completion of consultation on the West Northamptonshire Emergent Joint Core Strategy. That consultation led to a high degree of public interest in the SHLAA site assessments presented in the exercise, generally relating to concerns about the quantum of land required to meet the housing targets of the East Midlands Regional Spatial Strategy. This was despite assurances that the SHLAA was a technical exercise to support the plan making process, and that the outcomes of assessments did not themselves mean a site was or should be allocated for development. All comments were extensively reviewed, analysed and included in the total response, but it became evident that some filtering of comments was required. Those that related to the general principle of development or the role of housing targets and the Regional Spatial Strategy in the Planning Policy Framework, especially where not site-specific, were not deemed Valid in terms of updating SHLAA site assessments.

2.4. Members of the public made numerous valuable comments on sites, highlighting new physical constraints or policy designations not previously identified (e.g. Village Greens) and availability issues such as legal covenants not previously recorded. The vast majority of comments were deemed to be ‘Valid’ and did initiate an update of the technical evidence behind the SHLAA. Further significant interest was received from stakeholders and the development industry. Comments indicated a varied set of changing circumstances affecting specific sites and across the development industry more generally. These included changes to site promotion and availability, planning application activity (including the outcome of pre-application discussions) and updated information on physical constraints and high-level policy designations such as Flood Risk and SSSIs.

2.5. To remain in accordance with the original Methodology, ‘Valid’ comments were split into two categories. The November 2008 SHLAA Methodology highlights that the initial site assessments were conducted without reference to existing Saved Local Plan Policies and Designations, but it was decided during the analysis that comments relating to these areas were ‘Valid Policy’ statements. This was justified as some of the rationale behind such policies and designations, such as protecting the built heritage of an area or promoting Sustainable Communities, relate to principles that extend beyond the Saved Policy itself and would still apply in any future decision about whether a site is allocated. All other comments that related to physical / environmental suitability constraints on a site (including infrastructure requirements), availability issues and achievability factors (including infrastructure costs and timings) were noted as ‘Valid Evidence’. It is acknowledged that there is a degree of overlap between the ‘Policy’ and ‘Evidence’ distinction; some assets such as SSSI and Ramsar sites reflect high level policy designations and could present an insurmountable constraint under any policy scenario developed for the LDF and are therefore considered to be specific ‘Evidence’. Appendix 1 contains a copy of the original (November 2009) SHLAA Site Assessment Checklist and indicates whether comments against these areas were logged as ‘Policy’ or ‘Evidence’. Some additional criteria not contained on the original checklist are also added on this Appendix because they were raised extensively in the consultation and were deemed to need further investigation. More information is given on these criteria in the coming sections.
2.6. The extent of the consultation response meant some sites attracted a high degree of interest, with numerous parties making the same valid comments and in effect duplicating information. Comments were carefully scrutinised to ensure all relevant information was retained, but it was then necessary to remove duplicated comments. This left a summary of valid comments that could be attributed to specific sites and subsequently used to update site assessments. In total 1962 site-specific Valid comments requiring further investigation were identified after duplicates were removed.

3. Outcome from the Call for Technical Evidence Exercise:

3.1. The Call for Technical Evidence on the Draft SHLAA served a key function in establishing the amount of further work required to publish a final Strategic Housing Land Availability Assessment of the housing potential in West Northamptonshire. It was the intention to publish the final schedules of potential sites using the original information and April 2008 baseline date.

3.2. In accordance with the November 2008 SHLAA Methodology, provision is made to undertake a ‘Risk Assessment’ of the SHLAA as part of ‘Stage 8: Review of the Assessment’ (following the SHLAA Practice Guidance (CLG, 2007: 17)). The aim of the risk assessment is to determine “whether sites will come forward as anticipated”.

3.3. It was determined that a full ‘Risk Assessment’ of the SHLAA was not justified at the Draft Evidence stage as the site assessment process remained iterative, with significant scope for new information to be considered. This background paper summarises the process of ‘Risk Identification’ that was conducted to ensure all the factors that may have changed since commencement of the SHLAA were considered and investigated. This serves to summarise the output from the consultation and determine how site-specific concerns can best be addressed and re-evaluated. Risk identification also provided scope to investigate the underlying social, economic and political factors currently influencing housing delivery that were identified in the consultation response and have influenced the planning system in general.

3.4. Where risks are determined to have a tangible impact on the potential delivery of housing, either at a site-specific or general level, they have been taken forward into the final site assessment of housing potential in West Northamptonshire. This process is further considered later in this paper and in the SHLAA Methodology Update: December 2011.


4.1. Achievability of Housing Targets:

4.1.1. The East Midlands Regional Plan, published in March 2009, identifies a requirement for 62,125 new homes to be built in West Northamptonshire in the period 2001 to 2026. The information below indicates the level of housing completions against this target since 2001 and clearly demonstrate a marked downturn in delivery since 2007. Patterns vary between the Partner Local Planning Authorities, but the downturn in the last 4 years is pronounced across the plan area. The lowest annual completions were recorded last year in April 2011, showing the extent and longevity of the downturn. Completions against the Regional Plan target are recorded for the ‘Northampton Implementation Area (NIA)’ to recognise opportunities for dwelling delivery across Local Authority boundaries but related to the Principle Urban Area of Northampton. The NIA to 2011 includes all development inside Northampton Borough and
completions on the Grange Park development located in South Northamptonshire. For reference, a further table has also been provided recording the same housing completions against existing Local Authority boundaries (Table 2). Figure 1 displays the cumulative performance against the RSS dwellings requirement from 2001 to 2011 based on recorded completions.

<table>
<thead>
<tr>
<th>Location</th>
<th>01/02</th>
<th>02/03</th>
<th>03/04</th>
<th>04/05</th>
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<th>06/07</th>
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<th>09/10</th>
<th>10/11</th>
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</thead>
<tbody>
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<td>435</td>
<td>266</td>
<td>247</td>
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<tr>
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<td>1,009</td>
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<tr>
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**Table 1 – Housing Completions 2001-2011 Using RSS Dwelling Target Definitions**

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<th>Location</th>
<th>01/02</th>
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<th>06/07</th>
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<td>417</td>
<td>435</td>
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<td>183</td>
<td>174</td>
<td>158</td>
<td><strong>2854</strong></td>
</tr>
<tr>
<td>Northampton Borough Completions</td>
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<td>1802</td>
<td>983</td>
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<td>348</td>
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<td><strong>10784</strong></td>
</tr>
<tr>
<td>South Northamptonshire District Completions</td>
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<td>993</td>
<td>432</td>
<td>595</td>
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<td>257</td>
<td>248</td>
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**Table 2 – Housing Completions 2001-2011 Using Existing Local Authority Boundaries**
4.1.2. The Joint Planning Unit began exploring in detail the extent of the shortfall in delivery against Regional Spatial Strategy housing targets in November 2009, at the same time as the publication of the Draft SHLAA and the Call for Technical Evidence. Initial doubts had been raised in October 2008 in response to the Secretary of State regarding the revision of the East Midlands RSS. A view has been consistently maintained since this date that West Northamptonshire will find it impossible to complete the 62,125 dwellings required in the RSS by 2026. At April 2011 West Northamptonshire was 6,080 dwellings behind the RSS target. A Housing Technical Paper was prepared by the Joint Planning Unit that takes forward work from the National Housing and Planning Advice Unit (NHPAU) which anticipates a slow recovery in the housebuilding industry. This is due to ongoing constraints on mortgage lending and the availability of equity, loss of capacity in the construction industry and the slow economic recovery reducing potential returns and increasing costs as a result of inflation. This paper can be downloaded from the West Northamptonshire JPU Website.

4.1.3. The Housing Technical Paper predicts that at least 5 more years of heavily constrained delivery will occur (albeit with incremental annual improvement) that would increase the shortfall further. The shortfall in this period would be exacerbated by the fact that annual RSS targets for the Northampton Implementation Area are increased from 2011/12 onwards in anticipation of the delivery of significant growth through Sustainable Urban Extensions, which have been delayed by the recession. These factors are predicted to give a total shortfall of around -11740 dwellings, which would only reduce if completions in every subsequent year from 2016/17 to 2026 were delivered above the RSS target.

4.1.4. West Northamptonshire has only delivered dwellings above the RSS target for 3 years since 2001 (during the 2004/05, 2005/06 and 2006/07 period of strong growth). Building to around the RSS target level from 2016/17 onwards is considered highly challenging and potentially optimistic. It is feasible if the required Sustainable Urban Extensions around the major settlements can be made deliverable and developable at
historic build rates later in the plan period. Any attempt to reduce the shortfall established to this point by 2026 could be considered, with a high degree of probability, to be unsound and undeliverable.

4.1.5. The impact of the downturn has wide-reaching implications beyond the SHLAA process. The abovementioned impacts formed the central argument in reducing the proposed housing figure in the pre-Submission Joint Core Strategy to 50,150 dwellings. The housing, population and employment implications have been considered in a series of Technical Papers produced by the Joint Planning Unit. Whilst the total projected increase in population and labour force envisaged in the RSS cannot be met under the revised target significant growth is still provided for under this new housing figure.

4.1.6. The revised housing figure is not used directly to constrain deliverable and developable sites. It is, however, essential that the individual site assessments in the SHLAA reflect the prevailing circumstances influencing delivery.

4.1.7. The residual supply of sites with housing potential will exceed the 50,150 target in the published Pre-Submission Joint Core Strategy, especially due to the prevalence of smaller sites outside larger urban areas that are less immediately affected by the specific financial impact of the downturn. This will leave a degree of choice and flexibility in available land but it would not be the role of the SHLAA to make a strategic policy decision to allocate extensive amounts of land in these alternative locations, thus representing a move away from the existing national and regional policy direction to concentrate development in large Sustainable Urban Extensions around the main urban areas.

4.2. Changing of Government and pending RSS Revocation:

4.2.1. The Regional Spatial Strategy (RSS) for the East Midlands currently provides the regional tier of West Northamptonshire’s Development Plan. In the context of housing, the RSS sets out policies to be considered at the local level and the housing target of the different Partner Local Planning Authorities. This equates to 540 dwellings per annum in Daventry, 330 dwellings per annum in South Northamptonshire and an average of 1615 dwellings per annum (1300 to 2005/6, 1450 to 2010/11 and 1775 from 2011/12) in the Northampton Implementation Area (covering extensions to the main urban area extending beyond the Borough Boundary) between 2001 and 2026. More information is given on performance against this target in section 4.1 above.

4.2.2. Following the election of the Coalition Government, the intention to abolish Regional Spatial Strategies was announced. Although the Government attempted to revoke the RSSs in July 2010, this decision was subject to legal challenge and subsequently overturned in the High Court. The Government has since reiterated its intention to abolish regional strategies via enactment of the Localism Bill and subsequent Parliamentary Orders. These measures will put more power in the hands of Local Planning Authorities in terms of determining delivery requirements and the most appropriate pattern of development. This will be supported by an updated suite of streamlined planning policy guidance, of which the National Planning Policy Framework will be the cornerstone once adopted.

4.2.3. Until the necessary stages of the new system are enacted, and established in statute where required, there has been a lack of clarity about the future planning policy system. This has prevented Submission of the West Northamptonshire Joint Core
Strategy to date, but a strong position remains whereby preparation can be finalised and the plan subsequently adopted at the earliest opportunity and in accordance with the new policy system as soon as clarity emerges.

4.2.4. The Joint Planning Unit has demonstrated in the Housing and Population technical papers what the demographic implications would be from changes in the housing delivery target. As will be emphasised below, the reduction is currently based on the amount of delivery that is considered realistic and achievable rather than meeting a “locally derived” requirement. However, the demographic implications from the 50,000 figure have shown that some population growth above natural change would still be achieved, including elements of internal and international migration.

4.2.5. It is considered that the revised housing delivery figure is based on robust evidence as published in the Pre-Submission joint Core Strategy. Therefore, the SHLAA should calculate the residual supply of potential housing land required against this requirement.

4.3. **Evolving Site Availability and Achievability:**

4.3.1. It was acknowledged following the December 2009 consultation that the assumptions underpinning delivery on a large number of identified sites had changed significantly from the April 2008 baseline. In a number of cases construction that was anticipated to commence has not been observed. Where delivery has continued it has commonly been at significantly reduced rates. Significantly fewer sites have become actively promoted than was anticipated in the potential supply of sites coming forward in the Draft site assessments.

4.3.2. Work on the evidence-base for the Joint Core Strategy has clarified a number of economic, infrastructure and environmental constraints that specifically affect likely delivery of major strategic sites across West Northamptonshire. These findings form part of the robust evidence base for the Local Development Framework and have been used to revise the strategic allocations and policies as part of the pre-Submission Joint Core Strategy. Revised information now exists of reasons why sites have not come forward as anticipated and whether and when delivery is achievable. This represents a significant departure from the direction of the Emergent Joint Core Strategy which was prepared alongside the Draft SHLAA. It is considered that these fundamental changes in evidence must be reflected in the assessment of potential housing supply.

4.3.3. The pronounced downturn in completions has not generally been associated with a lack of available land confirmed in the planning pipeline. Northampton Borough and South Northamptonshire District are both largely able to demonstrate a 5 Year Land Supply even against the RSS requirement when looked at from a land supply rather than delivery viewpoint. Sites initially expected to bring significant delivery early in the plan period are expected to deliver at slower rates over a longer period and with delayed start dates, especially when only ‘Approved in Principle’ or subject to finalised Section 106 agreements. Sites with extant full permissions have also been readily mothballed during the recession, particularly in Northampton Borough but also Middlemore in Daventry District, despite the Draft SHLAA evidence suggesting they would be completed soon after the April 2008 baseline.

4.3.4. The availability of sites is also considered to need more specific consideration as a result of the downturn. A number of consultation responses were received revising
information as to whether a site is now available or unavailable. This was an anticipated result of calling for more Technical Evidence and it was always anticipated all comments would be followed up prior to publication of the Final SHLAA report. Sites identified that are now considered unavailable, or where availability or promotion is not confirmed, are now viewed as less likely to provide delivery before the end of the plan period.

4.3.5. The circumstances, including their degree of impact, affecting achievability and availability will vary on a site-by-site basis but must be considered for all submissions moving forward to the final assessment of housing potential.

4.4. Planning Application Activity:

4.4.1. It is a requirement under Planning Policy Statement 3: Housing, for each Local Planning Authority to identify a five year supply of deliverable sites for housing as part of the provisions to increase housing supply. The information is published annually by each Local Planning Authority as a Housing Land Supply document and represents the most up-to-date and reliable reflection of where development is expected to occur within the next 5 years. The West Northamptonshire Housing Land Supply position at 1st April 2008 represented a key component of the original SHLAA evidence as it provided a reasonably accurate indication of potential housing supply in the immediate period. The majority of sites with capacity for 2008-2013 were identified through this source and covered land with extant planning permission.

4.4.2. For the final SHLAA assessment of potential housing supply to remain robust the published data should reflect the most recent available Housing Land Supply. With the period elapsed since the April 2008 baseline this data has been continuously updated to ensure data integrity with the 5 Year Land Supply. The Strategic Housing Land Availability Assessment has been accurately re-based to the latest date of which a Housing Land Supply document is available; the 1st April 2011 will be used as the revised baseline at final publication.

4.4.3. An update of the housing land position is essential to maintain the robustness of the SHLAA evidence for its own sake but also serves to address many of the other risks identified in this paper, at least with regards how they impact on the delivery of housing in the short term. A significant amount of planning application activity has continued to take place, even in a constrained economic climate, and this has established new sites with the potential for housing supply. This is also a useful exercise to highlight sites identified in the SHLAA process as they have moved through the planning system and obtained planning consent for residential development. As significantly, the Housing Land Supply position incorporates a significant degree of research and investigation into the housing market and will quantify many of the changes impacting on delivery against the 2008 baseline. Each site within the Housing Land Supply is given a projected output for each of the first 5 years. This will allow identification of sites that have ‘lapsed’ since April 2008; these no longer have an extant planning permission and are not automatically on the Housing Land Supply and considered deliverable within 5 years. The projected delivery can be compared with the trajectory in the Draft SHLAA evidence and updated as appropriate, especially where construction has not commenced as expected.
4.5. Updating Developability Constraints from April 2008 Baseline:

4.5.1 An extensive range of environmental and physical constraints was considered at the 2008 baseline for the Draft SHLAA assessments. Based on the consultation responses received, it became apparent that some of these constraints had evolved to affect sites in different ways since the original date. Revision of technical evidence, for example in terms of new Local Wildlife Site designations or identified Flood Risk Zones, is common. These have been updated as the potential housing land supply in West Northamptonshire moves forwards from the information available at the original April 2008 baseline.

5. Summary Draft Housing Potential against Identified Risks

5.1. The risks identified in this paper are considered in terms of whether they will affect sites coming forward as anticipated in the draft assessment of potential. This serves to establish the framework against which further evidence should be considered.

5.2. The table below (Table 3) demonstrates the potential supply identified at December 2009. It should be noted that capacity was split across ‘retained’ and ‘potential’ sites, which were defined in the following way:

5.3. To be seen as ‘Retained’ a site is considered suitable for housing development if it offers a suitable location for development and would contribute to creating sustainable mixed communities. Where a suitable site has been identified as being both available and achievable, it has been categorised in this SHLAA as a Retained site. The retained sites include outstanding planning permissions on sites of 10+ units. All of these sites have been assessed and the numbers of dwellings left to be built as at 1st April 2008 have been recorded.

5.4. Other potential sites may be suitable subject to resolving constraint issues, but are otherwise available and achievable. These sites have been categorised in this SHLAA as ‘Potential’ sites.
5.5. The investigative work identifying risks against some of the components of the site assessment process summarised in this paper demonstrates the increasing weight of constraints against development in the current climate. Work has demonstrated that identified sites may be subject to these risks whether originally termed ‘Retain’ or ‘Potential’, particularly when considering the reduced rates of delivery even on sites with extant planning consents.

5.6. None of the additional risks identified in this report considered in isolation are guaranteed to undermine the potential for housing on an identified site, particularly when the entire 15 year period is considered. A desktop review conducted shows that since the publication of Draft evidence in December 2009 some sites have continued to be actively promoted and / or subject to planning applications. Changes in developability constraints are selective and rarely lead to sites becoming undevelopable.

5.7. However, the SHLAA update leading to the final assessment of housing potential must consider the weight of identified risks against specific sites and how this could affect the original position. This is most often, but not exclusively, observed to be the case when several factors can be seen to affect a site in combination. The December 2009 SHLAA acknowledged that potential housing capacity was identified subject to overcoming constraint issues. Where a site is demonstrated to be not actively promoted and may be contrary to existing principles guiding the pattern of development in national and regional policy, it must be assessed whether housing is conceivably deliverable or developable within the 15 year period.

Table 3 – Summary of potential housing capacity identified in November 2009 Draft WN SHLAA

<table>
<thead>
<tr>
<th>Completion 2001-05</th>
<th>Retained** Sites 2008–2021</th>
<th>Total Completions and Retained Sites</th>
<th>Regional Plan Target 2001 - 2021</th>
<th>Surplus/Deficit against Regional Plan Target</th>
<th>Potential* Sites 2008 - 2021</th>
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<td>South Northamptonshire Council (Excluding the NIA)</td>
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* Includes Orange Park

** Includes sites on Brownfield Land.
6. Review of Advice Obtained To Take Forward the SHLAA Update and Accommodate Identified Risks in Site Evaluation: -

6.1. In addressing the abovementioned risks and issues highlighted during production of the Draft SHLAA and the subsequent response to the ‘Call for Technical Evidence’ consultation the Joint Planning Unit sought advice on how best to take forwards the SHLAA process and proceed with updating site assessments. The advice was obtained from two sources; Andrew Wright Planning provided a review of the Draft SHLAA and Jeremy Peter Associates provided further technical input and insight to identify the key factors for re-assessing sites. Jeremy Peter also provided a first review of sites to check the consistency of the update process.

6.2. Both sources had been previously involved in production of the Draft SHLAA. Andrew Wright Planning assisted with production of the initial Methodology and establishing the role of the SHLAA Panel. Jeremy Peter was employed as a consultant in part of the team that undertook the original site assessment process in 2008 and 2009. Re-utilising sources familiar with the West Northamptonshire context was seen to add value and consistency to the update process. The advice from Andrew Wright is summarised below, with the input from Jeremy Peter included in the SHLAA Methodology Update: December 2011 paper.

7. Andrew Wright Planning: Review of WNJPU Draft SHLAA

7.1. Andrew Wright brings considerable expertise of the SHLAA process, being involved in the Planning Officers Society Enterprises team that developed the original SHLAA practice guidance for the Department of Communities and Local Government and working to further refine this advice through work with the Planning Advisory Service. A full review paper produced by Andrew Wright, which evaluates the project to date and suggests potential refinement, is available on the Joint Planning Unit website as part of documentation produced with the Final SHLAA. The stage-by-stage update to the Original Methodology contained in the ‘SHLAA Methodology Update: December 2011’ document details how this advice has been interpreted and incorporated in the Final SHLAA. The findings presented below serve to emphasise the necessity and importance of the update undertaken by the Joint Planning Unit.

7.2. In summary, the Andrew Wright analysis has identified some components within the key principles behind the West Northamptonshire Draft SHLAA that relate to elements of the identified risks. Specifically, these were identified as: ‘Engagement with development interests’; ‘Unsuitable sites included in the SHLAA’; ‘Treatment of constraints on “potential” sites’; ‘Delivery Timescales and Build Rates’.

7.3. Although issues were raised in the Andrew Wright Paper regarding the involvement of the SHLAA Advisory Panel in the assessment process, these can be justified within the West Northamptonshire context. The lack of an established Housing Market Partnership to readily bring together landowner, developer and stakeholder interests in an open and transparent manner led to the establishment of the ‘SHLAA Advisory Panel’. Despite the sensitivity of commercial interests preventing a full assessment of all sites by the Panel, significant input was achieved in both establishing the Methodology and reviewing a selection of sites to inform further work. The role of the Panel is considered sufficiently in-
line with guidance providing the group is re-convened to discuss the update of assessments leading to publication of the Final SHLAA.

7.4. The requirement to acknowledge changes to Delivery Timescales and Build Rates was an expected outcome of the Andrew Wright review and justified further input from Jeremy Peter Associates to provide technical guidance. Specific refinement in these areas is taken up further in the Methodology update, following the guidance from para. 2.28 of the Andrew Wright Paper that:

“The SHLAA needs to similarly reflect the realities of housing delivery, and this will require a reassessment of the lead-in timescales for housing sites, and the building rates likely to be achieved.”

7.5. The main areas for attention are highlighted in relation to the inclusion of ‘unsuitable’ sites in the original assessment and the treatment given to constraints on ‘Potential’ sites. This was a known issue, as the SHLAA was developed within the context of

- There being no previous SHLAA or similar data, and therefore a view that a comprehensive data collection exercise was required; and
- The SHLAA was being undertaken in the context of West Northamptonshire being a designated Growth Area.

The classification was developed as an interim position pending the acquisition of additional evidence planned as a part of the publication of the Draft SHLAA. The advice from Andrew Wright Planning confirmed that the original categories of RETAIN / POTENTIAL / DISCARD are not in accordance with issued guidance, and in his view gave rise to a situation where:

“What appears to have happened is that any site where a significant constraint is identified has been put into the “potential” category. There is no encouragement for such an approach in the SHLAA guidance. It creates serious uncertainty as to what the true potential supply might be, because classifying a site as potentially developable must carry the implication that it may not be developable. (Para 2.15)”

7.6. The report encourages site categorisation to more specifically indicate whether a site has a realistic prospect of delivery within the 15 years after overcoming any constraints on developability. A more stringent investigation of the scale of physical, highways and environmental constraints is also encouraged to better identify the realistic prospect of mitigating these within the 15 year period, if at all. Reference should be made to the current economic for development climate is making this judgement. The issue is further complicated by the Review’s findings that the Draft SHLAA misinterpreted the original SHLAA guidance on identifying site suitability. As part of the work undertaken in producing the Andrew Wright Paper:

“A review of the sites in the SHLAA suggests that some are quite unsuitable for development, eg because they are detached from any settlement, or much larger than would be appropriate in a village.”

7.7. This supports issues highlighted in the risk assessment and through consultation responses and leads to a clear impression that:

“the inclusion of such sites contributes to a significant over-statement of the potential supply of housing sites and the real strategic choices available to the planning authorities.”
7.8. As suggested in the risk assessment, it is considered that this outcome came largely as result of the SHLAA Advisory Panel concluding that sites should not be considered unsuitable on policy grounds as this could be seen as making judgements based on the existing policies used to constrain development. Where such policies applied to a site, this led to a situation where the policy was automatically assumed to be a straightjacket preventing exploration of potential growth options. In reality, this led to the fundamental planning principles behind such policy considerations being overlooked. This is not the purpose of the suitability assessment, and considerations such as a location in open countryside are likely to be identified as a barrier to development in any policy framework and therefore should be considered a suitability constraint.

7.9. The Draft SHLAA undertook a full assessment of all sites, choosing to regard none as explicitly unsuitable or ‘non-runners’ prior to assessment. It will therefore be essential to provide an updated assessment for all sites as part of the review, but through the use of revised classifications develop a clearer indication of whether a site is considered deliverable and developable within the 15 year period. Different appendices should be used to clearly highlight the assessment outcomes, with the constraints on developability or deliverability explicitly identified.

8. Conclusion and Way Forward:

8.1. This paper has summarised progress on the West Northamptonshire SHLAA since publication of draft evidence in December 2009 and the intention to move to publication of a final assessment of housing potential. Key risks have been identified through analysis of the response to consultation and further investigation of additional political and economic factors. Further advice sought from Andrew Wright Planning has been summarised to identify where identified risks may impact on sites coming forward as expected from the draft assessment of housing potential. This has allowed the consideration of measures to better resolve the factors identified that have been taken forward further as part of the ‘SHLAA Methodology Update: December 2011’ supporting the final SHLAA document.