West Northamptonshire Joint Strategic Housing Land Availability Assessment (SHLAA)

SHLAA Methodology Update: November 2011
1.0 SHLAA Methodology Update: November 2011 – Introduction

1.1 This paper builds on the ‘West Northamptonshire SHLAA: Background Paper’ in detailing how a comprehensive and robust final assessment of potential housing supply in West Northamptonshire has been conducted. Resolutions have been sought for risks identified since December 2009 and incorporated within an update of the original Methodology developed for the SHLAA assessment in November 2008. There remains a close adherence to the original Methodology followed, which should be read in conjunction with this document.

1.2 As well as addressing the risks identified in the Background Paper this update serves to ensure the assessment of housing potential incorporates the latest evidence and information for each site identified. This recognises the time period that has elapsed since the draft evidence was compiled. Any information that may have changed has been comprehensively revised and re-considered. For this reason the updated assessment of housing potential moves the data for planning application and developability constraints from an April 2008 to April 2011 baseline. As indicated in the SHLAA Background Paper the assessment of housing potential on all 885 sites identified in the draft evidence has been reviewed against the ‘Methodology Update’. This ensures the robustness and completeness of the assessment process.

1.3 A summary is given below of the advice sought from Jeremy Peter Associates in revising specific aspects of the Methodology and updating each site assessment. The more technical aspects of this advice are incorporated under the review of individual stages which follows in this paper.

2.0 Jeremy Peter Associates: Input to the Re-assessment Methodology and Review of Assessments during the update

2.1 Advice was sought from Jeremy Peter Associates, an independent planning consultancy, to assist with updating the site assessment criteria for the Final SHLAA document and to build upon the revision to specific stages of the SHLAA process proposed in the Andrew Wright Planning Review. He has had a number of years working as a planning consultant with the development industry, specialising in residential development. He has also worked with the House Builders Federation (now Home Builders Federation) as a Land and Planning Officer for over 10 years and as well as being a Land and Planning Director with a medium sized house builder. Such input brings extensive experience from within the development and construction sector and ongoing active awareness of the current pressures on development.

2.2 Jeremy Peter was an original member of the West Northamptonshire SHLAA team, representing one of two consultants recruited externally to assist in developing the initial methodology, site identification and detailed assessments. This has provided continuity to
the SHLAA process through a historic awareness of site locations and characteristics and an understanding of the initial methodological and planning policy context. This has aimed to ensure that necessary revision and improvements can be applied to the original framework as seamlessly as possible.

2.3 A full desk review of every identified SHLAA site within Daventry and South Northamptonshire Districts was undertaken by Jeremy Peter during a period within the Joint Planning Unit offices. This built upon the initial review conducted by the Joint Planning Unit following the evidence gathering exercise. Northampton Borough was not covered as part of this process primarily as it was felt the context was different due to the urban nature of the area and more specific local knowledge could be provided by the Borough Council Planning Policy and Development Management Officers to support the update; the majority of potential capacity in Northampton Borough relates to previously identified urban capacity and planning application activity already identified in-house.

2.4 Through the Jeremy Peter Review the Joint Planning Unit was able to translate identified risks and areas for methodological improvement into specific criteria and justifications to use as part of the site assessment update. The detailed areas addressed have been fed into the stage-by-stage update covered below, but in summary the issues primarily related to site availability, density and sustainability in relation to site size and location.

3.0 Stage-by-Stage Review and Update of the November 2008 SHLAA Methodology Paper:

3.1 The following review details aspects of the original methodology where the criteria for assessing housing potential have been reviewed, whilst also briefly summarising those areas where no change has been required. Unless an aspect of the methodology is explicitly highlighted as having changed, it should be considered that the SHLAA methodology at November 2008 was adhered to in conducting the assessment. It is advised the November 2008 SHLAA Methodology (available for download from the Joint Planning Unit Website) is read in conjunction with this document.

3.2 At all times it is advised that the stages in this methodology are interrelated and iterative; the impact of one criterion for housing potential is not overriding when the methodology as a whole is applied against an identified site. Such an approach is consistent with the SHLAA Practice Guidance and advice obtained from Andrew Wright Planning.

3.3 For reference the process stages followed in preparing the Strategic Housing Land Availability Assessment are set out in the diagram below. These are outlined in Government’s Strategic Housing Land Availability Assessment: Practice Guidance.
4.0 Stage 1: Planning the Assessment

4.1 No alterations are proposed to this stage in the Methodology. A commitment has been retained to work jointly in preparing the SHLAA and a considerable amount of resource has been committed from the Partner Local Planning Authorities in helping to review and update site assessments. The SHLAA Panel has also been reconvened, providing consultation to discuss the need for updating the SHLAA and with the aim of seeking board agreement for the processes followed. In accordance with procedures followed prior to publication of the Draft SHLAA in December 2009, the SHLAA Panel has not worked closely on a detailed site-by-site basis in terms of agreeing any revised results of individual assessments.

4.2 No requirement exists to conduct another round of wider public consultation following publication of the final SHLAA results. The results of the initial evidence gathering exercise
have been extremely valuable in providing evidence to contribute towards the updated site assessments and have been utilised where appropriate. It is not felt further comments on the evidence would be valuable at this stage given a requirement to review and update the SHLAA already exists and will be carried out in the coming months and years. This is seen as a more suitable opportunity to extensively update evidence that may have changed considerably from the original April 2008 baseline.

5.0 Stage 2: Determining which sources of sites will be included in the Assessment

Broad scope of the assessment

5.1 The broad scope of the SHLAA assessment has not been changed since publication of the November 2008 Methodology. The assessment covers the same spatial area and continues to include all towns and villages and adjoining or closely related areas.

5.2 All sources of sites with potential remain considered; each site assessed as part of the Draft Call for Further Evidence consultation has been reviewed and a revised assessment will be published in the final SHLAA report. Substantial changes where sites have been sub-divided or substantially altered are clearly referenced, but no sites have been explicitly removed.

5.3 As the base date for the SHLAA has been updated to 1st April 2011, rather than 1st April 2008, some new records have been created. These relate to sites for more than 10 dwellings which have received planning permission, but which were not on the original SHLAA. No assessment of these sites has been considered necessary, as the granting of planning permission, or the progressing of the site through the planning process, automatically means that they are available for development within 5 years. These sites are clearly indicated in the schedules.

6.0 Stage 3: Desktop Review of Existing Information

6.1 It has not been necessary to update the majority of the information used in the initial desktop review that was conducted to identify specific opportunities within the sources with housing potential agreed in Stage 2 of the methodology. With sufficient land with the potential for housing against the RSS dwellings target already identified through the initial process it was immediately decided that there was no need to increase the range of sites being considered. This decision took no reference of the reduced dwelling delivery target emerging as a part of the Local Development Framework. The main outcome of this choice established that no new Call for Sites stage would be conducted as part of the SHLAA update.
6.2 The majority of the remaining data sources used in site identification have not been sufficiently updated or altered to justify their use to identify additional potential sites since the April 2008 baseline. Specifically, no significant update has been conducted on the Urban Capacity Studies, Employment Land Reviews or the National Land Use Database across the SHLAA area to facilitate the identification of new sites through them. Although no new sites have been added to the Urban Capacity Study, the Joint Planning Unit has undertaken a full review of the Northampton Borough Urban Capacity Study (2003) in June 2010 to ascertain whether previously identified sites have had no planning application activity or have obtained planning permission or been developed. This has not added new potential sites but has given an updated baseline against which to assess ‘Urban Capacity’ sourced sites.

6.3 It is acknowledged that other datasets may be subject to more regular updates and could yield information on potential new sites e.g. registers of vacant commercial property. However, data from these sources can be unreliable and would be subject to further change on a regular basis. It is therefore not considered that such a review would identify a significant number of additional sites with housing potential from the pool already identified and would not represent an efficient use of resources.

6.4 Although resources from the initial SHLAA process have not widely been used to identify new sites, it has been necessary to revisit some data sources to establish whether characteristics have changed on sites already being considered. For example, this specifically relates to checking whether sites initially identified as vacant / derelict remain in this state (or vice-versa) and the status of sites being promoted and funded for regeneration. Evidence from the desktop review has also been revisited where changes to site boundaries have been identified and additional information is required to support an update of mapping.

6.5 It has been necessary to update Stage 3 of the SHLAA Methodology in terms of repeating an update of all data sources used to identify sites already in the planning process (although sites not already identified and merely subject to pre-application discussions have not been added to the schedule of sites). It has been necessary to conduct a full review of planning permissions, Local Plan Allocations and completions since 2008 to ensure the SHLAA maintains a consistent baseline against the housing trajectory in the Joint Core Strategy. A failure to acknowledge changes in the planning pipeline would risk double-counting capacity in the SHLAA against completions already monitored elsewhere and would miss important changes to site capacity or phasing as a result of the impact of current economic conditions. Finally, the planning pipeline update is necessary to identify lapsed planning permissions previously identified as full approvals where there has been a significant reduction in the certainty over both developability and, particularly, deliverability of a site within the 15 year period.

6.6 New sites in the planning pipeline with a capacity of 10 or more dwellings that were not previously identified in the SHLAA process have been added to the site schedules. This is to maintain consistency with the baseline position in the Joint Core Strategy and is necessary to help calculate the remaining supply that needs to be identified after establishing all sites
with a clear indication of developability and deliverability within the 15 year period have been included. It is to be noted that even in the subdued economic climate since April 2008 a significant amount of planning application activity has been identified in West Northamptonshire.

6.7 The update has also returned to evidence that identified sites in the Joint Core Strategy process, primarily through the Issues and Options consultation. Progression from the Emergent to pre-Submission stage of Strategy preparation since publication of the Draft SHLAA in December 2009 has necessitated a significant update of the evidence base supporting sites for Sustainable Urban Extensions in particular, notably addressing infrastructure and delivery challenges identified earlier in this document. Whilst the SHLAA is not a policy document and it is not necessary for the site assessments to align with proposed Joint Core Strategy allocations a comprehensive assessment of realistic housing potential can only be provided by including revised information and expectations for such locations.

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

7.1 All the sites identified and assessed in the original December 2009 SHLAA have been carried forward into the update. It was decided that the overriding presumption was that sites did not need to be physically re-surveyed due to the comprehensive initial assessment undertaken. Site surveys were undertaken when desktop evidence and responses to the consultation indicated a significant change in access or suitability constraints on the ground.

7.2 The site size threshold has not been changed from the original assessment. All previously identified sites have been carried forward into the update as they still meet the criteria of being capable of yielding 10 or more dwellings based on density calculations or were otherwise over 0.25ha in size. Any sites carried forward from the original desktop review (Stage 3 above) already highlighted as being too small in December 2009 have also been put forward for review but this is merely to ensure all sites are covered and there is no expectation they will now show strategic potential. This process, however, allows such sites to be accounted for as strategic potential if they have now received planning permission for 10 or more dwellings or constraints information has changed considerably.

7.3 It has been acknowledged that when the assessment of specific sites is reviewed a number may drop below the strategic threshold of being capable of yielding 10 or more dwellings. The reasons for this could be numerous, including changes to the net developable area or obtaining planning permission for 9 or less dwellings. These sites will still show in the update as being carried forward from the original assessment based on their previous results but will be listed on a separate schedule of sites now to be considered as delivery on smaller sites.
7.4 Recording of capacity on smaller sites was identified in the Andrew Wright paper as an important area for improvement to ensure the SHLAA is a comprehensive assessment of all current and future housing land supply (see Para. 3.8, Andrew Wright Planning Review). The update remains consistent with the Para. 6.15 of the original methodology in not seeking to identify additional non-strategic potential for housing on sites not in the planning pipeline and only expected to yield 9 or less dwellings. This approach continues to align with National guidance, and therefore also the approach to the housing trajectory in the Local Development Framework, that no allowance for windfall should be made to contribute towards meeting future housing targets.

7.5 However, it was recognised that the original SHLAA did not give sufficient weight to sites already in the planning pipeline with a capacity of less than 10 dwellings, primarily because all the necessary data was not readily available at the time the SHLAA schedules were first created. These elements of supply were therefore not included in the Surplus / Deficit calculations in the original SHLAA. Such sources of supply have become increasingly important in the period between 2008 and 2011 during the economic recession, representing a significantly greater proportion of overall delivery as deliverability constraints have been felt on larger sites. Additionally, the supply of committed sites for 9 or fewer has been replenished consistently due to the relatively quick preparation and delivery of such sites against larger schemes. As referenced earlier in this document, supply of this nature is expected to support a large proportion of delivery in the immediate years due to the anticipated slow nature of economic recovery. Significant resource has been provided at both the Joint Planning Unit and the partner local authorities to collate, verify and update the relevant information.

7.6 The baseline position for the Local Development Framework housing target takes account of all completions and committed supply at the trajectory base-date and therefore represents a significant discrepancy against the SHLAA. This issue has been comprehensively addressed in the update. A separate entry is now provided as part of the Surplus / Deficit Calculation to account for all committed supply for 9 or less dwellings (all committed supply for 10 or more dwellings remains captured in the SHLAA assessment itself as per the previous methodology). To calculate the residual for which additional housing potential needs to be identified, completions from 2008-2011 have been updated and split to identify completions on smaller sites less than 10 dwellings and those on larger sites of 10 dwellings or more. Any SHLAA sites that have either been completed or obtained planning permission for 9 or fewer dwellings since April 2008 remain identified but have now been included on a separate schedule to show are no longer expected to deliver a strategic number of dwellings. This ensures they are not double counted against the line that identifies completions and commitments on smaller sites. These changes ensure the updated potential capacity for housing within the SHLAA is fully consistent with the housing trajectory in the Local Development Framework.
8.0 Stage 5: Carrying out the survey

8.1 As addressed in Section 4, there was not considered to be any requirement to revisit sites from the original assessment due to the comprehensive initial recording of site characteristics against the ‘site assessment checklist’. The majority of changes could be suitably identified from desktop evidence and consultation evidence. Only where changes have a highly significant effect on a site’s previous status or are unclear was a site visit judged necessary.

9.0 Stage 6: Estimating the housing potential of each site

9.1 As per paragraph 6.12 of the original methodology, primacy remains given to developer estimates or proposed planning permission capacities when estimating the yield and density of a site providing these are realistic. Where developer estimates or planning application estimates have emerged on sites assessed since the April 2008 baseline these have generally replaced original calculations in the update.

9.2 No significant changes have been made to the process in this stage of the methodology. Gross to developable area assumptions have been retained from the original assessment as they remain in-line with best practice guidance. As in the original assessments, deviations from the expected gross to developable area ratio of a site are legitimate when significant constraints on a site further reduce the area likely to be seen as suitable for residential development. Where revised evidence has indicated this may now be the case on a site, such as through an increased proportion subject to Flood Risk, the original developable area calculation has been revised.

9.3 Use of the Urban Design Compendium (English Partnership [now Homes and Communities Agency]) remains supported in Practice Guidance and the typology for considering densities per hectare has therefore been retained within the updated methodology. This ensures the majority of sites retain their original yield estimate for consistency and remain identified as a potential source of strategic housing capacity.

9.4 Following advice obtained from Andrew Wright and Jeremy Peter Associates, however, it was deemed necessary to revise certain areas of the previous typology as illustrated below. Development densities have been assumed at 30 dwellings to the hectare per net developable area where identified in the table below. Given the changes to PPS3 that allow local planning authorities to determine development densities, it is considered that reasonable to assume an average density requirement of 30 dpha on some sites to reflect national policy advice to make efficient use of land. It is also considered that this average density is sufficiently flexible to allow for more or less dwellings to be developed across the range of sites. Sites in these identified locations have continued to see the greatest levels of planning application activity during the economic downturn compared to urban areas, with
most applications coming in at reduced densities to reflect current conditions. This revision also incorporates evidence of changing house types being considered on such types, specifically a reluctance to include any flatted development on such schemes.

<table>
<thead>
<tr>
<th>Table 3: Densities per hectare</th>
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<tbody>
<tr>
<td>Location</td>
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<tr>
<td>-------------------------------</td>
</tr>
<tr>
<td>Northampton</td>
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<td></td>
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<td></td>
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<tr>
<td></td>
</tr>
<tr>
<td>Daventry, Towcester, and Brackley</td>
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<td></td>
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<td></td>
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<tr>
<td>Other towns and Villages</td>
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9.5 For the purposes of this update no amendment has been made to density assumptions in other areas of the typology. It is acknowledged applications may well come forward for significantly different house types and densities than suggested in the Design Compendium. However, in urban areas viable deliverable schemes are likely to still necessitate the building of accommodation at densities similar to those suggested in the table above if they are to come forward at all. It is also noted that a greater proportion of urban and central sites have existing planning or developer yield estimates and therefore the standard density assumptions need not be used.

9.6 Where either gross to developable area or density assumptions have changed from the original assessment these have been updated and yield estimates have been calculated as per the original methodology.

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

10.1 A thorough review of each individual site assessment published in the Draft December 2009 SHLAA has been conducted under this stage using both the original and updated information.
from the abovementioned stages. For the majority of site assessments minimal change was observed and the record was able to be easily migrated to the new classification and final site schedules. The starting point for each assessment remains the definitions to establish the deliverability and developability of sites through assessment of suitability, availability and achievability factors. These definitions and principles have not changed in the Practice Guidance and their comprehensive analysis remains the goal of this assessment. The process is therefore essentially unchanged against the Site Assessment Checklist adopted in the original methodology that allows all factors to be considered. The site assessment process remains policy neutral with respect to adopted Local Planning Policies and Designations, for example in terms of defined Village Confines and Important Local Gaps. The SHLAA is not a policy document and does not in any way replace, or allocate sites against, these policies but assumes there is scope for these to be amended at some point in future policymaking.

10.2 Drawing on advice from the Andrew Wright review of the SHLAA, the update to this stage represents both an update of selected technical evidence that underpins aspects of the assessment criteria (i.e. flood risk, environmental designations etc.) and a change in the degree of weight attached to certain factors against the original methodology.

10.3 Following analysis of consultation responses and as a result of the risk assessment carried out (see associated Background Paper) it was deemed necessary to conduct an update of key areas of evidence that identify physical and environmental suitability constraints to developing a site. These represent information that is known to have changed since April 2008 or was most frequently queried. The Joint Planning Unit also undertook certain suggestions to incorporate entirely new technical evidence into the assessments, particularly in terms of landslide hazards identified as an additional risk when developing policies for the Local Development Framework. Spatial layers were used to update or add the following information for each site assessment:

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Updated/ New Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agricultural Land Grade</td>
<td>New Information</td>
</tr>
<tr>
<td>Ancient Monument</td>
<td>Updated Information</td>
</tr>
<tr>
<td>Ancient Woodland</td>
<td>New Information</td>
</tr>
<tr>
<td>Conservation Area</td>
<td>Updated</td>
</tr>
<tr>
<td>Flood Risk</td>
<td>Updated</td>
</tr>
<tr>
<td>Green Wedge/ Local Gap</td>
<td>New Information</td>
</tr>
<tr>
<td>Historic Parks &amp; Gardens</td>
<td>Updated Information</td>
</tr>
<tr>
<td>Important Local Gap</td>
<td>New Information</td>
</tr>
<tr>
<td>Landslide Risk Data</td>
<td>New Information</td>
</tr>
</tbody>
</table>
### SHLAA Methodology Review

<table>
<thead>
<tr>
<th>Listed Buildings</th>
<th>Updated Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nature Reserve</td>
<td>New Information</td>
</tr>
<tr>
<td>Planning Application Search</td>
<td>Updated Information</td>
</tr>
<tr>
<td>RAMSAR Site</td>
<td>New Information</td>
</tr>
<tr>
<td>Regional Geological Site</td>
<td>New Information</td>
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<tr>
<td>Safeguarded Sand &amp; Gravel</td>
<td>Updated Information</td>
</tr>
<tr>
<td>Sand &amp; Gravel</td>
<td>New Information</td>
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<tr>
<td>SSSI</td>
<td>Updated Information</td>
</tr>
<tr>
<td>Village Green/ Common Land</td>
<td>New Information</td>
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<tr>
<td>Wildlife site</td>
<td>Updated Information</td>
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<tr>
<td>Within Village Confines</td>
<td>New Information</td>
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10.4 This stage also represents the point at which detailed comments received during the ‘Call for Technical Evidence’ exercise or subsequently have been fed into the site assessment update. These specifically cover, but are not limited to, issues regarding ownership, promotion, access or infrastructure that affect the achievability and availability of a site and were not covered under the review of technical evidence identifying suitability constraints. It is understandable that a large number of these factors have changed between April 2008 and April 2011 and as a result it is necessary such areas are comprehensively updated where information has been made available.

11.0 **Matter of Weight Revisions to Site Assessment Checklist**

11.1 The three main areas where the ‘principles of approach’ in the SHLAA were queried by Andrew Wright and it was recommended revised weight was given to evidence as part of the assessment checklist (including consideration of all updated information as detailed above) have been considered under this stage. This has partly led to the development of some new criteria being applied against site assessments but primarily to the establishment of a new classification system for site assessment results. These key changes are summarised below:

11.2 Under recommendation from Andrew Wright the identification of unsuitable sites has been expanded to consider the location and scale of development proposed on sites taking into account the requirements for ‘sustainable development’ principles in relation to the settlements where they are located. This serves to fulfil the requirements of Para. 7.7.4 in the original SHLAA Report and removes a large amount of the uncertainty over the potential
capacity for housing particularly on village sites in rural locations by fully considering Regional and National policy in this area.

11.2.1 This has been achieved as an iterative process, but the starting point has involved assessing the estimated yield estimate of a SHLAA site against the number of dwellings (using average household size) that would add 5%, 10% or 15% to the population of a village against the 2001 Census baseline. The Village Services and Facilities Technical Paper sets out the sustainability evidence for each settlement. This approach has been developed as part of early work to establish a settlement hierarchy in the Joint Core Strategy but the work is only considered indicative at this stage. Nevertheless, it does provide an evidence basis from which an assessment of sustainability can be derived. Because the settlement hierarchy is not yet established in adopted policy, the upper threshold of allowing up to a 15% increase in population has generally been applied against all sites. It is recognised not all locations will be able to accommodate a 15% increase in population sustainably and this could alter the future consideration of some sites but it is considered a realistic starting point to identify housing potential against current policy.

11.2.2 The results of this additional criterion have been used to more clearly identify unsustainable sites in rural locations. It has not been necessary to apply this approach against the towns of Northampton, Daventry, Towcester and Brackley where no proposals would add more than 15% to the existing population. The new assumption being made is that yield estimates adding more than 15% to a rural population would result in unsustainable and disproportionate number of dwellings for village to absorb conflicting with sustainability objectives in PPS1 (para 23 vii), PPS3 (para 30, 36, 38), PPS7 (para 1 and 3) and RSS Policy 3 and Policy 11.

11.2.3 Sites considered ‘as submitted’ with these characteristics are thus seen as unsuitable under any conceivable policy regime in the Local Development Framework. They have not been classified as non-runners outright and have remained of the subject to a full site assessment because there are often few other suitability constraints on site that would prevent their developability. Where this is the case it is noted that site submissions could be modified from those currently presented to develop a workable scheme or the scale of development may become seen as suitable under Neighbourhood Planning demands.

11.2.4 In-line with the original methodology a full site assessment has been conducted on all identified sites carried forward into the update. For this reason, this new criterion has not been used to specifically reclassify sites as ‘non-runners’ to be removed from the schedules. However, updated classifications reflect where the scale of development on a site as submitted is vastly excessive to proportionate requirements or the site is either located in open countryside or would represent a significant extension of the village into open countryside. In these cases it is considered “unimaginable those sites would be seriously considered for development in a DPD” (p.3 Andrew Wright Paper). They are thus judged similarly to sites with irresolvable infrastructure, physical or environmental
constraints (e.g. excessive Flood Risk) listed as ‘Discard’ in the Draft December 2009 SHLAA.

11.3 More nuanced consideration is now given to sites that were classified as ‘Potential’ in the original assessments, or would have become ‘Potential’ under the new information considered as part of this update. It is recognised that uncertainty was caused in the original assessment by showing potential housing delivery across sites identified in this category that were subject to a range of constraints of differing magnitudes. Potential housing capacity is now only shown where a site is classified as developable in terms of the constraints on a particular site being capable of being resolved, and this is achievable within a timescale which will enable development to commence within 15 years of adoption of the core strategy. Where the conclusion is that the constraints are not likely to be capable of being resolved within the 15 year period, the site should be classified as “not currently developable” as advised by the SHLAA guidance. A site assessment has still been completed on these sites to maintain consistency with the originally published schedule of sites, but no capacity is shown in the SHLAA supply. A site is likely to be seen as “not currently developable” for the following reasons in the updated assessment:

- The criterion described under point 1 above has been used to identify “not currently developable sites” in terms of levels of development likely to be seen as disproportionate under current and emerging National, Regional and Local policy frameworks.

- The SHLAA update has taken the approach that a site not actively being promoted for development, either through expressed interest on behalf of a landowner or control by a housing developer, has no “reasonable prospect” of development within the 15 year period. This approach is potentially contentious, but due to the significant supply that remains on sites free from these constraints it is seen robust in terms of identifying a realistic amount of delivery over the 15 year period. This is further backed up by the ongoing constraints in the economic climate and construction sector that are unlikely to allow sites to come forward quickly. In addition, three years have passed between the base dates of April 2008 and April 2011 but the number of previously unprompted sites that have come forward through the planning system or been identified as now available in the consultation is very limited. It would therefore by overly optimistic to identify potential supply on sites seen as unavailable at the review date.

- Using the latest evidence-base for the Local Development Framework a judgement has been made regarding the realistic prospects of resolution for the major infrastructure issues that affect identified sites. In-line with the Andrew Wright review, it is generally seen that constraints can be overcome to support development within the 15 year period where development is otherwise seen as suitable. It is recognised that the infrastructure constraints across the plan area are one of the major factors constraining the scale of delivery likely to be achievable in West Northamptonshire across the 15 year period. Therefore, these constraints continue to affect the capacity anticipated on specific sites, but this has either been considered as part of updating site specific information (i.e. pre-
application discussions) or under issue 3 considered below. This does not alter the positive approach overall that considers constraints can be overcome within the 15 year period.

11.3.1 In terms of availability, sites in active commercial use (or those that are vacant but could still be actively marketed) have been treated in essentially the same way as the original assessments. These sites were ‘Discarded’ as part of the initial results and the intention to retain sites providing employment and service (i.e. healthcare and education) functions remains a key element of emerging Local policy and National guidance. This continues to remove a large amount of urban sites in Northampton from showing potential housing capacity but represents a consistent approach. When reclassifying such sites, a decision has been taken that it is not ‘unimaginable’ that they could be developed if circumstances as there are often few other developability constraints on-site and accordance with other regeneration and brownfield-focused policy principles. It is recognised that on a number of sites a sequential approach needs to be taken where sites have obtained residential planning permission despite active commercial use ongoing prior to these being implemented. In such cases the methodology recognises the clear and realistic prospect of housing capacity and so this must be included. Where this is not the case it is impossible to sustainably or robustly identify capacity on such sites as any policy framework is likely to inhibit consideration. One exception has been made to this “rule”, and that is where the Central Area Action Plan (CAAP), which has been the subject of public consultation, has identified areas of redevelopment opportunity and indicated a number of housing units to be created, whilst not identifying specific sites. An allowance has therefore been made of 1,000 units on sites which are currently classified as “C”, which reflects the additional planned units within CAAP for which sites are not specifically identified. Sites which already have planning consent or “approval in principle” are classified within the SHLAA as either “A” or “B” sites. The 1,000 additional allowance is for sites currently classified as “C” because they do not have consent, but the areas within which they are located are actively promoted for residential or mixed use development within the CAAP.

11.3.2 As per the original assessments, sites where there is no active use (i.e. open land), active uses have been identified as reasonably likely to cease, or a site is substantially derelict and could sustainably be considered for regeneration are considered as potential sources of capacity. They have a likelihood of becoming available in a way that could realistically and sequentially be supported by emerging policy frameworks. In all instances these assessments are nuanced and take account of the full site assessment checklist to highlight other constraints and also noting that any change in use through further consideration of residential development would be subject to approving change away from existing use and / or open space assessment etc.

11.4 Delivery timescales and build rates have received comprehensive attention since the original assessments and they have been updated to provide a more realistic trajectory of anticipated delivery reflecting the on-going recession in the housing market. It has not been possible to apply one updated trend in build rates to all sites as this would not
accurately reflect the range of contexts across amongst the sites submitted; delivery is likely to be dependent on greenfield / brownfield status, urban / rural location and total expected capacity. The following key consideration have been used to guide individual trajectory updates:

- Delivery in the first 5 years of the period is only expected on sites already identified as deliverable and developable in the 5 Year Land Supplies of Partner Local Planning Authorities. As far as possible information has been updated so there is a close match between these sources. Not every site within the 5 Year Land Supply is expected to complete within the first 5 years of the period if significant constraints remain. There are limited exceptions where sites without planning permission are included in the first 5 years supply. These serve to address sites with a small total capacity and advanced pre-application discussions / resolution to approve prior to April 2011; delivery on such schemes will be expected to commence relatively shortly after permission is obtained.

- The accepted ‘rule of thumb’ that a single volume house builder will provide and sell 50 units per annum on a site has been significantly tempered in the update to reflect the current climate. Furthermore, the assumptions that up to 6 builders are likely to be involved on a major strategic site have not been made for the majority of the 15 year period. The impact of these considerations are site specific, but generally see completion rates rising to 50 per annum after the first 3-5 years of the period. It is expected that 2 or more volume builders will return to work on major strategic sites, but generally not until the second half of the 15 year period.

- Where possible, delivery trajectories have been updated using site-specific evidence. This is particularly the case for SHLAA submissions matching proposed Sustainable Urban Extensions in the Joint Core Strategy where more up-to-date information was obtained to support the housing trajectory in the Local Development Framework.

- For rural and suburban sites outside the principle urban area with no other information available an average build rate of 12 dwellings per annum per builder was applied. Given the recessionary effects on the house building industry and subsequent completion rates of dwellings, it was considered prudent to lower the build rates for sites from that initially suggested by the SHLAA. This lower build rate is reflected in the trajectory of individual sites. These considerations drew from the recommendations of Jeremy Peter who provided extensive recent experience of sites within these contexts.

- Slightly faster build rates have been assumed for sites within urban areas, taking account of the increased proportion of flatted development that remains expected in such locations which tends to lead to more concentrated activity once construction commences. This tends to support anticipated completions of 20-25 dwellings per annum, but considerations remain site-specific and also draw information from similar sites on the 5 Year Land Supply.

11.4.1 It was recognised during the update that revised delivery estimates on specific sites have an impact on neighbouring sites where activity is required to progress either
sequentially or in conjunction to ensure a location is seen as suitable and achievable. Where a site would be related in open countryside and / or substantially divorced from existing settlement if developed in isolation this is noted. If the scale of development on sites immediately adjacent settlement boundaries will not be substantially delivered until late in the 15 year period, or further infrastructure improvements not seen as reasonably achievable would be needed support any further development, it is not reasonable or sustainable to identify capacity on any more distantly located sites. This should ensure development is identified in a deliverable and sustainable spatial pattern as part of the site assessment. All other factors in a site assessment remain considered in isolation, with further deliverability and developability also identified where they exist.

11.4.2 As per the previous methodology, where deliverability considerations prevent the total predicted capacity of a site being completed by the end of the 15 year period further potential is assumed to remain for the period beyond 2026 but is not provided with a year-by-year trajectory. This has been particularly crucial given the dramatic reductions in the anticipated delivery of Sustainable Urban Extension sites to 2026.

12.0 Revised Classification of Site Assessment Outcomes

12.1 As a result of the revised site assessments conducted under this methodological review and to fulfil the suggestions of the Andrew Wright Review sites have been reclassified from the status they received in the Draft December 2009 SHLAA. The reasons that these were not fit for purpose have already been stated in this update. It is further stressed here, however, that the factors identified in individual site assessments have undergone no change in most instances but the revised classifications offer much greater certainty on the total potential capacity actually likely to be delivered within the 15 year SHLAA period. The revised classifications with a brief description and relationship to the original Draft are outlined below. As highlighted previously all assessments are iterative and no single factor ensures a site will appear in a given category.

- Classification ‘A’: These sites are considered developable and deliverable within 0-5 years. They generally already have obtained Planning Permission and are still expected to be implemented within this period. Other smaller sites with no other major constraints or active employment use and ostensibly in-line with National Planning Policy that either have pending applications or advanced pre-application discussions may appear in this class as delivery would be expected to commence relatively quickly after permission is obtained. This category can also include existing Saved Local Plan Allocations, depending on projected delivery information.

- Classification ‘B’: Sites that are considered developable in 5-15 years, but do not currently have planning permission or an allocation and with no guaranteed delivery prospects in the immediate future. These sites are largely free from physical and infrastructure constraints and will be broadly in line with National Planning policy considerations (particularly in terms of delivering sustainable communities) and the evidence-base for Local Development Framework policies.
They may not be immediately acceptable if an application was submitted under current Development Management policy, but if allocated there would be nothing to prevent or hinder delivery in the plan period. Larger B sites may have significant infrastructure hurdles to overcome that could delay delivery, or physical/policy constraints that reduce the developable area, but neither should ultimately prevent consideration or allocation within the plan period. Sites in this classification are expected to be demonstrably ‘available’ in terms of promotion or intent to promote, but long-term derelict sites with clear potential for regeneration may also be included.

- **Classification ‘C’**: Sites in this category are likely to be broadly developable but not deliverable within 15 years. This classification represents sites where it would not be robust to identify a realistic potential housing capacity with the 15 year period at the April 2011 base-date. This is likely to be due to infrastructure constraints being too severe to overcome within 15 years. Alternatively, the site may be so large that even if constraints could be overcome late in the 15 year period, the proportion of the site that could be brought forward would not represent meaningful delivery of the site as submitted. Physical constraints may also be too significant to be remedied in 15 years. C sites may be broadly developable but deficient in one or two key areas of National Planning Policy or emerging Local Development Framework considerations. For example, sites in villages that would grow the population by more than 15% would fall into this category. Some, but not all, C sites could be re-submitted as smaller proposals in the future and offer realistic delivery prospects. A site will receive this classification even if it is promoted as available if subject to the indicative range of constraints highlighted above. A site may also appear in this category if there are very few developability issues but no record of promotion and / or ownership as availability can represent a significant barrier to deliverability in itself for reasons already outlined.

- **Classification ‘D’**: These sites are not considered developable and delivery will not be possible within 15 years. Departures from National and Regional Policy would be significant e.g. location in open countryside divorced from existing built-up settlement or development being of a vastly disproportionate scale for the adjacent village or settlement. Developability may only become realistic if other sites are built out so these sites represent future natural extensions, but this would require speculative consideration far beyond the 15 year period. In some cases infrastructure considerations alone could justify this classification, at least based on the proposal as submitted and knowledge about the scale of mitigation required. Insurmountable physical constraints on some sites covering a significant percentage of the total area, especially Flood Risk and Landslip, can justify this category. In some cases sites listed in this classification could be broken down into smaller parcels and reconsidered but will always require significant departure from the submitted information and go beyond the scope of this assessment. There may be cases where the distinction with C sites is blurred, but classification as Classification D highlights it is currently unimaginable that
capacity could be envisaged on a site as submitted unlike classification C where a path to resolution appears more achievable.

12.2 Sites from the original December 2009 assessment will be re-published in Appendices under the revised classifications. The following table summarises the categories. Only those sites under classifications ‘A’ and ‘B1’ display a realistic potential for deliverable and developable capacity to be included within the SHLAA housing trajectory. In addition to the revised classifications used above, it is recognised that a number of sites have moved significantly through the planning process since April 2008 and no longer provide the potential for any future strategic capacity for a number of reasons. A record of all sites from the Original Report will be kept for consistency, but sites have been removed to the following Appendices for reference only as applicable

- Classification ‘X’ – Sites from the April 2008-based assessments that have now been completed. They will be covered as part of the completions for 2008-2011 included as part of the calculations for Residual Requirements in the main report.
- Classification ‘Y’ – Sites considered too small for the SHLAA assessment and unable to display a potential capacity for 10 or more dwellings. This is either through yield estimates calculated in-line with the methodology or because a site has obtained planning permission for 9 or fewer dwellings since April 2008. Completions on these sites will be recorded as part of routine housing monitoring but the sites will continue to be reviewed in the SHLAA to ensure planning permissions are not amended to provide a total of 10 or more dwellings.
- Classification ‘Z’ – This classification covers sites where the total dwelling delivery since 2008 has been for 10 or more dwellings but the residual capacity at April 2011 is for 9 or fewer dwellings. They are no longer included in the trajectory for potential sites in the SHLAA and will be counted under routine housing monitoring, but if assessed since April 2008 will be shown to have delivered a strategic amount of units. Sites will be monitored to ensure the residual element of planning permissions is not amended to make the remaining capacity greater than 10 dwellings.
- For the avoidance of any doubt, the original schedule of sites which were excluded for being too small are also published as Appendix “W”.

13.0 Stage 8: Review of the Assessment

13.1 A revised housing trajectory will be produced for the Final SHLAA from the updated site assessments in accordance with the original methodology.

13.2 It should be noted that small site commitments for 9 or less dwellings have now been included in calculations and removed from the residual requirement against the Local Development Framework housing trajectory, but no future delivery of windfall sites is included as a source of capacity in-line with practice guidance.
13.3 A risk assessment has been carried out to guide the methodology update supporting the SHLAA update. It is anticipated a further risk assessment will be conducted in April 2012 to highlight key issues for the full SHLAA review.

14.0 Stage 9: Identifying and assessing the housing potential of broad locations (where necessary)

14.1 This stage was not conducted either as part of the original methodology or this review.

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

15.1 As per the original methodology and for reasons outlined elsewhere in this update no allowance is made for the potential of windfall in identifying the future supply of land for housing. The updated assessments provide a clearer and more robust assessment of where the deliverable and developable potential for housing capacity exists and continue to identify a sufficient level of supply. A windfall allowance is therefore not justified.

16.0 What happens next?

16.1 This document sets out the consistent approach which has been taken to the update of the SHLAA database. The results from this review will be published in January 2012, and will be used as a part of the evidence base supporting the development of the West Northamptonshire Joint Core Strategy and subsequent Development Plan Documents being prepared by the West Northamptonshire Joint Planning Unit and its partner Councils.