

West Northamptonshire Strategic Plan
Strategic Land Availability Assessment Methodology –
Technical Consultation Document
January 2020



South
Northamptonshire
Council



Northamptonshire
County Council

The following technical document is published for consultation until Friday 27th March. If you have any comments on the content of this document please submit them either online at: <https://westnorthantsplan.inconsult.uk/> , or via email to: westnorthantsjpu@northampton.gov.uk.

1 Introduction

- 1.1 The West Northamptonshire Strategic Land Availability Assessment (SLAA) is an assessment of land availability to help identify a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period covered by the West Northamptonshire Strategic Plan. The plan covering the administrative areas of Daventry District, Northampton Borough and South Northamptonshire.
- 1.2 The SLAA will form a key element of the evidence base to support the development of the strategic plan. It will assist in the identification of strategic sites that will come forward over the plan period (from adoption). In due course, further small sites will be assessed separately as part of the evidence base for Part 2 Local plans. Sites emerging from this assessment may be included in the five year housing land supply as appropriate.
- 1.3 **The SLAA is a technical document only. Consequently it is necessary to include the following disclaimer;**
- The inclusion of any site in the assessment does not indicate that it will be allocated or successfully obtain permission. Similarly, the non-inclusion of a site in the assessment does not in any way preclude future development, providing it meets the planning policy framework that exists at the time a site comes forward.*
- 1.4 National planning guidance on producing Land Availability Assessments is provided in the Planning Practice Guidance (PPG) which accompanies the National Planning Policy Framework (NPPF). The PPG sets out a five stage methodology to identify sites and broad locations with potential for development, and the likelihood that they will come forward.

Planning Context

- 1.5 The most recent LAA which covered West Northamptonshire (known as a Strategic Housing Land Availability Assessment at that time) was undertaken in 2009 and updated in 2012. That assessment only focused on residential land and the assessment did not take account of development plan policy considerations, instead focusing on gaining an overview of total capacity within the joint plan area.

Furthermore Northampton Borough (2019) and Daventry District (2016) undertook Housing and Economic Land Availability Assessments (HELAAAs) as part of the evidence base for their part 2 local plans. South Northamptonshire did not undertake an equivalent assessment as it was not considered necessary for their Part 2 Local Plan as they did not need to make any allocations.

- 1.6 It is important to note that significant work was undertaken for the respective examinations of the Daventry and South Northamptonshire Part 2 Local Plans regarding housing delivery. For Daventry this included work on site specific infrastructure and statements of common ground regarding housing delivery on sites. Given it was undertaken recently in 2019 it is not considered necessary to revisit this work and it will be used to inform this assessment.
- 1.7 The West Northamptonshire Issues Paper identifies the different levels of growth that could be planned for up to 2041 taking into account existing commitments. This is based on information set out in the Housing Background paper¹.

Table 1 West Northamptonshire Housing Scenarios

Scenario	Approximate Requirement to 2041	Supply to 2041	Residual Requirement to 2041
Local Housing Need	48900 dwellings	38500	10400
Local Housing Need +10%	53700 dwellings	38500	15200
Local Housing Need +20%	58600 dwellings	38500	20100
Arc-related Growth	61700 dwellings	38500	23200

- 1.8 Whilst the level of growth to be planned for has yet to be determined clearly the above scenarios will present the minimum and maximum levels of housing to be provided over the period to 2041.

¹ West Northamptonshire Strategic Plan - Housing Background Paper (2019) available from <https://westnorthantsplan.inconsult.uk/consult.ti/WNSPIssues/consultationHome>

- 1.9 The PPG states that the assessment should identify all sites and broad locations regardless of the development needed to provide an audit of available land. However, as the strategic plan will focus on allocating larger strategic sites, potentially leaving further smaller allocations to subsequent plans, this assessment will focus on identifying a sufficient number of strategic sites.
- 1.10 With regard to the economic development uses, further evidence will be undertaken to establish the quantum of employment land to be provided over the plan period.

Engaging with Stakeholders

- 1.11 The NPPG identifies a range of stakeholders who should be involved in the land availability process. This includes developers, those with land interests, land promoters, property agents, local communities, local enterprise partnerships, businesses and business organisations, neighbouring authorities, town and parish councils. Initial involvement has already taken place through the “call for strategic sites” carried out alongside the Issues paper consultation and specific engagement events related to that document. A SLAA panel also is being established to help develop this draft methodology. However further engagement will take place through the following;
- Consultation on the SLAA draft methodology (this consultation)
 - The SLAA panel will assist in the consideration of any responses to this draft methodology, further details of which will be provided in Appendix 1.
 - Site specific discussion with site promoters where clarification of their submissions are required.
 - West Northamptonshire Strategic Plan formal consultation process
 - Discussions with authorities that adjoin West Northamptonshire as part of the Duty to Cooperate
- 1.12 The published SLAA will include a summary of the engagement process on this draft methodology, a summary of comments received and how these have been addressed in the final methodology.

2. Undertaking the Assessment

- 2.1 Figure 1 below sets out the flow chart from the PPG which outlines the five key stages required to undertake the assessment. The West Northamptonshire Joint Planning Unit (WNJPU) will aim to closely follow this in the methodology however it will need to be locally adjusted to reflect the need to assess both Housing and Economic Development land uses more clearly than provided for by the guidance.

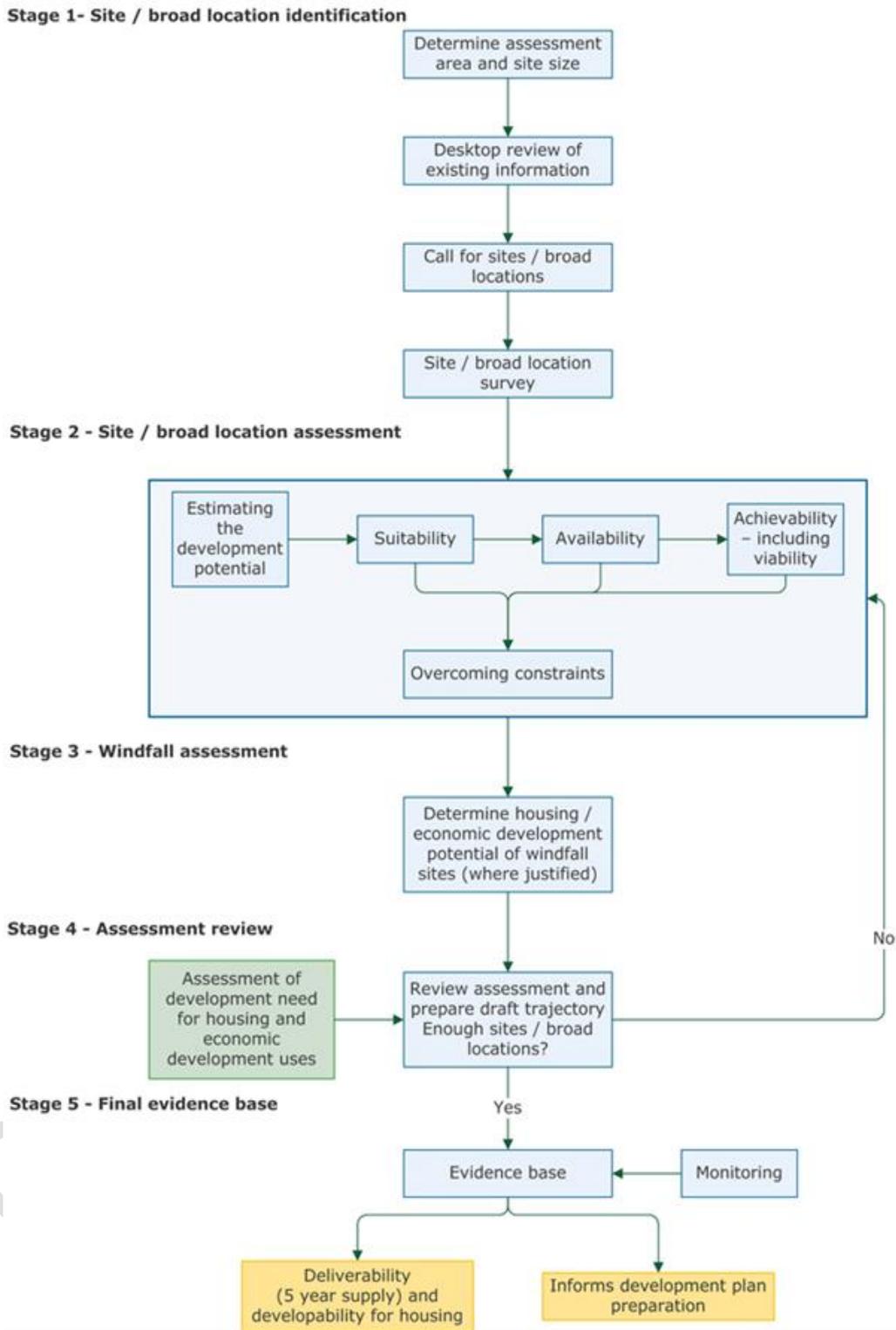


Figure 1: Planning Practice Guidance Housing and economic land availability assessment - Methodology flow chart

Stage 1 – Site/broad location identification

Determine assessment area and site size

- 2.2 The NPPG advocates that LAAs should be produced on a sub-regional basis in partnership with other local authorities. This will involve consulting the local authorities which adjoin West Northamptonshire and the NNDJPU on this draft methodology, and involving them as appropriate in the assessment of any sites in close proximity to their boundaries, or where there would likely be an impact on their areas, e.g. through additional traffic.
- 2.3 The geographical area for the assessment is the area known as West Northamptonshire which is the administrative areas of Daventry District, Northampton Borough and South Northamptonshire. The SLAA will also be reviewed as appropriate to inform the production of the strategic plan, which may include further reviews at different formal stages of the plan-making process. Where necessary it will also be discussed with neighbouring authorities in line with the duty to cooperate.

Figure 1 – Map showing the area covered by the assessment



Site Size Thresholds for the West Northamptonshire Strategic Plan

- 2.4 Given the strategic nature of the Plan, this assessment will consider all sites capable of accommodating 700 dwellings (net) or more, or economic development on sites of 20ha and above. Whilst these thresholds are different to that indicated in the guidance set out within the PPG it is considered to be justified given the strategic scale the plan is intended to operate at.
- 2.5 Groupings of smaller sites may also be considered where in combination they could provide a strategic scale of development in accordance with the site size thresholds specified above.

Call for strategic sites

- 2.6 The PPG states that a call for sites and broad locations for development should be aimed at as wide an audience as is practicable so that those not normally involved in property development have the opportunity to contribute. This should include developers, landowners, promoters, local communities, businesses, town and parish councils and others relevant local interest groups.
- 2.7 A call for sites was undertaken as part of the consultation process for the West Northamptonshire Strategic Plan Issues Paper for 10 weeks between 5th August and 11 October 2019). Notifications were sent to everyone on the West Northamptonshire JPU Consultation Database. Parish Councils within the District were invited to attend one of 6 briefings held during the consultation period in various locations followed by 6 exhibitions held at different venues across the area where members of the public were also invited to attend. Press releases were also used and copies of the 'call for strategic sites' forms were made available at the main Council offices, at local libraries and on the West Northamptonshire Joint Planning Unit website. Approximately 70 sites above the site size threshold (including a proportion for employment uses) were received during the consultation period. A substantial number of smaller sites were also submitted.

Desktop review of existing information

- 2.8 When carrying out a desk top review to identify sites further to those submitted under the Call for Sites, the PPG states that sites/broad locations from as wide a range as possible should be included. This includes sites which have particular policy constraints for comprehensiveness.

2.9 In accordance with the PPG the assessment will not be constrained by the need for development. The assessment will consider sites (meeting the relevant thresholds) from the following sources:

- Sites submitted through the 2019 Call for Strategic Sites
- Sites submitted through the Land Availability Assessments undertaken for the Part 2 Local Plans
- Existing commitments consisting of
 - Allocations (including existing industrial estates identified in the saved policies of the Local Plans)
 - Unimplemented/outstanding planning permissions
 - Sites that are under construction
- Planning applications that have been refused or withdrawn
- Public sector land (Local Authority and County Council owned)
- Sites/broad locations identified in Master Plans / development briefs
- Sites on the brownfield register
- Sites/broad locations identified by officers including those to provide completeness e.g. around existing settlements, where not covered by any of the above.

2.10 The above sources will be used to assess development for housing (including Gypsy and Traveller provision), employment and retail development where appropriate.

Brownfield sites

2.11 Local planning authorities are required to keep a Register of Brownfield Sites within its area. The definition of brownfield land is land which meets the definition of “previously developed land” in the NPPF. Any sites that meet the requirements to be classified as a brownfield site that emerge through this process will be placed on the register as appropriate.

Site survey

2.12 All sites identified, which meet the size threshold criteria, will be assessed. In accordance with the PPG the following characteristics will be recorded during the survey process:

- Site location
- Current land use
- Surrounding land uses
- Site area
- Development progress (where applicable)
- The following physical constraints
 - Flood Zones (2 & 3)
 - Potential contaminated land
 - Environmental designations (such as SSSI, LNR, Local Green Space)

Sites to be excluded at Stage 1

2.13 The PPG states that only sites that have a realistic development potential should be assessed in more detail. The JPU will therefore undertake a sieving process so that only sites that have realistic potential are assessed in more detail. This approach is in line with the PPG which states that site surveys should be proportionate to the detail required for a robust appraisal. Sites that are excluded at this initial stage will be those that are either completely or partially within the constraints below. For those that are partially within these constraints they will only be excluded if the potential need for mitigation would result in the capacity no longer be strategic in nature i.e. above 700 dwellings or 20 ha employment land) :

- Site of Special Scientific Interest
- Local Nature Reserves
- Historic Parks and Gardens
- Functional floodplain (Flood Zone 3a or 3b)
- Ancient Woodlands
- Scheduled Monuments
- The Upper Nene Valley Gravels Pits Special Protection Area

2.14 Sites that are rejected at this stage will be recorded in the report and reasons for their rejection will be set out (see 2.35). Sites that remain after this sieve will be surveyed. This will allow the JPU to ratify information gathered through the SLAA Call for Sites process, to gain a better understanding of the character of the site and its surroundings as well as any potential physical constraints and barriers to deliverability.

Stage 2 – Site assessment

Suitability

2.15 Sites allocated in existing development plans (including made Neighbourhood Plans and those with a published Decision Statement) or with planning permission will generally be considered suitable for development. Other sites will also be considered suitable when assessed positively against the following suitability tests through either scoring “Yes” or a positive qualitative outcome:

Residential

Suitability Test	Explanation of how test undertaken e.g. Yes/No or Qualitative with an explanation (where necessary)
Is the site consistent with National Policy?	Qualitative – predominantly an initial judgement against the three pillars of sustainable development, Social, Economic and Environmental
Does the site have suitable access/can it be provided?	Yes/No
Is the site located within a Flood Risk zone?	Yes/No and Relevant Floodzone
Is the site located in an area with hazardous ground conditions, pollution or contamination?	Yes/No
What is the impact on landscape character and/or any heritage assets?	Qualitative taking into account existing landscape character assessments and evidence on landscape designations including the existing Special Landscape Areas and heritage assets from desktop

	assessment
Is the site accessible to existing services and facilities?	Qualitative with an indication of distances where appropriate
Would the site have an impact upon environmental or other open space designations (both national and local)?	Qualitative
Would development result in any amenity impacts experienced by would be occupiers or nearby residents?	Qualitative
Are there any neighbouring land uses which could have a detrimental impact on potential future occupiers?	Qualitative
Do any public rights of way cross the site and would its enjoyment be affected?	Qualitative
Does the site include any of the Best and Most Versatile Agricultural land?	Reference to grade of land

The following are additional tests for sites promoted solely for employment;

Suitability Test	Explanation
Is the site closely located to existing employment areas?	Qualitative
Can the site gain access to the strategic highway network from an existing access arrangement?	Yes/No
Does the site have any gradient constraints?	Qualitative
Does the site have access or potential access to high speed broadband?	Yes/No/Unknown

2.16 Consideration will also be given to existing policies of the development plan, including made Neighbourhood Plans. As this assessment is intended to inform the production of the new strategic plan for which the spatial strategy is not yet determined the consideration of existing development plan policies will focus on non

spatial policies. Taking the above factors into account, the sites will be assessed against the following three degrees of their suitability:

Suitable	Sites which are located within an area which would or demonstrably could contribute to the delivery of sustainable development, would not have a significant detrimental impact upon the character and appearance of the wider area; would not result in adverse impacts experienced by would be occupiers; would be compatible with neighbouring land uses, would have suitable access through sustainable modes of travel (including access to the strategic highway network for employment sites), and have no physical constraints which would prevent development within the next 5 years.
Not Currently Suitable	Sites which are subject to some form of constraint which would prevent development being delivered within the next 5 years but may be overcome during the remainder of the plan period (i.e. within the next 6-15 years).
Not Suitable	Sites which are subject to some form of constraint preventing development which is unlikely to change during the plan period (e.g. do not contribute to the delivery of sustainable development, subject to an environmental designation or subject to significant risk of flooding).

Table 2: Degrees of suitability

Availability

- 2.17 The PPG states a number of factors which should, on the best information available, provide clarity as to whether a site is available for housing. These factors have been incorporated into the following set of categories of availability and build on the indicated availability timescales set out in the Call for Strategic Sites form:

Available	Sites which are controlled/owned by a developer who have provided clear evidence of an intention to develop, or land owner(s) who have provided clear evidence of their intention to sell; and there is clear evidence that there are no ownership issues which could prevent development being delivered at some point within the next 5 years, i.e. before 2025
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Not Currently Available	Sites which are subject to some form of ownership constraint which would prevent development being delivered within the next 5 years there is a realistic prospect that they will be overcome during the remainder of the plan period i.e. between 2025 and 2040.
Not Available	Sites which have no evidence to suggest that a developer or land owner expressing an interest to develop or sell the site for development; or any ownership issues which are unlikely to be resolved during the plan period or have been indicated as not being available until 2041 ² .

Table 3: Degrees of availability

- 2.18 The PPG also states that the existence of a planning permission does not necessarily mean that a site is available. For residential sites, each Local Planning Authority undertakes an assessment of sites as part of the annual land availability reports which may include contacting site promoters/developers to establish anticipated delivery rates. As appropriate this information will be used as evidence within this assessment for the availability of strategic sites with planning permission or allocated.

Achievability

- 2.19 The PPG states that a site is considered achievable for development where there is a reasonable prospect that housing will be developed on the site at a particular point in time. The 2019 Call for Strategic Sites: Site submission form included a number of questions regarding land ownership and asked if there were any challenges to be overcome to bring the site forward. It also asked when the site would be available.
- 2.20 For sites with outstanding planning permission information from the Council's annual Housing Land Availability Reports will be used as evidence regarding expected future build out rates. For consistency the approach taken in the HLA reports will be applied to prospective sites in this study, and where necessary will be informed by discussions with the landowners/promoters. Sites will therefore be assessed for their 'achievability' as follows:

Achievable	Sites which have a reasonable prospect that development will start within the next 5 years.
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² Or 2050 if the plan-period is extended

Not Currently Achievable	Sites which have a reasonable prospect of being developed at some point during the remainder of the plan period (i.e. within the next 6-20 years).
Not Achievable	Sites which have no evidence to suggest that there is a reasonable prospect that they will be developed within the plan period.

Table 4: Degrees of achievability

- 2.21 This approach is useful for making a judgement on housing sites but is more difficult for employment land because prevailing market conditions may mean that certain uses are unviable (i.e. for speculative development) in the short term, but may not be in 5 years' time. Indeed, in areas of market failure this could result in all employment sites being unviable. Despite this, however, it is important that a portfolio of different types of site is identified so that longer term sustainable development of the area is not constrained.
- 2.22 The information on suitability, availability and achievability will be used to assess the deliverability of each site and the reasonable timescales in which each site could be delivered. Each site will be categorised as either:
- deliverable (i.e. it is available now, at a suitable location and there is a reasonable prospect that development could commence on the site within the first 5 years of the adoption of the plan),
 - developable (i.e. it is a suitable location and there is a reasonable prospect that it will be available and could be delivered in the remainder of the plan period),
 - not developable.

Overcoming constraints

- 2.23 The PPG states that where constraints have been identified, the assessment should consider what action would be needed to remove them (along with when and how this could be undertaken and the likelihood of sites/broad locations being delivered).
- 2.24 The outcomes of the Suitability, Availability and Achievability assessments will be set out within the assessment tables. This will include a separate table of sites which the assessment deemed to be 'not developable' for housing based on current evidence. The identified constraints applicable to each individual site will be set out and where possible, the action(s) needed to overcome them.

Garden Villages/New Settlements

2.25 Sites that are promoted as garden villages/new settlements will be assessed against the respective criteria set out above however it is acknowledged that lead-in times to bring forward the sites might mean that sites do not meet the highest score for availability and achievability.

Estimating the development potential – Residential

2.26 The PPG states that the development potential of each identified site should be guided by the existing or emerging plan policies including those on density. Policy H1 of the adopted West Northamptonshire Joint Core Strategy states that allocated Sustainable Urban Extensions (SUEs) should achieve average minimum densities of 35 dwellings per hectare. Outside of the SUE's policy H1 requires housing developments to make the most efficient use of land having regard to a range of considerations which include the location and setting of the site, and the existing character and density of the area.

2.27 Where sites have outstanding planning permission for housing the permitted number of units will normally be used. If a site has an existing layout and proposed yield this will be considered and taken forward if it is felt appropriate. For all other sites the following range of densities will be applied to assess capacity:

- Sites within urban areas (Daventry, Northampton, Towcester and Brackley) 40 dph
- Sustainable Urban Extensions and sites adjacent to main urban areas 35dph
- Sites elsewhere in the area 30dph

2.28 There may be circumstances where different densities are used, for example to respond to local character or to take into account a Town Centre location where a higher density might be preferable therefore the above densities should be regarded as a starting point only.

2.29 In addition to the above, a development ratio of 60% will be applied to estimate development potential to take into account the accompanying forms of development needed for residential development (e.g. access and service infrastructure, open space provision, community facilities etc). The requirements for infrastructure will be greater the larger the site.

Estimating the development potential – Employment

- 2.30 The development potential of sites suggestion for other forms of development is more difficult to calculate however the following factors will be taken into account;
- information submitted by the promoter
 - Potential land-take up of the proposed use classes- based on similar types of development within the surrounding area.

Stage 3 – Windfall assessment

- 2.31 The term “windfall site” is defined as sites which have not been specifically identified as available. They normally comprise of previously developed sites that have unexpectedly become available. Paragraph 70 of the National Planning Policy Framework (NPPF) advises that a windfall allowance may be justified in the supply if a local planning authority has compelling evidence that such sites will provide a reliable source of supply. It adds that such an allowance should be realistic, having regard to historic delivery rates and expected future trends, and should not include residential gardens where policies prevent this.
- 2.32 To date each Local Planning Authority has looked at a windfall allowance individually.

Daventry District

The Daventry District Housing Land Availability 2019 Report (table 2) includes historic annual windfall delivery rates since 2008/09. Between 1st April 2008 – 31st March 2019 there has been 1186 windfall completions (including those on garden land) with an annual average of 107.

Northampton Borough

The Northampton Borough Council Land Availability Assessment (September 2017) analyses previous windfall development in Northampton between 2011 – 2017.

On average there have been 468 windfall completions each year over the past 6 years.

Excluding sources of supply that would typically be allocated in a Local Plan such as sites for more than 30 dwellings and exhaustible supply such as hospital and school sites, and including a 10% reduction to ensure a conservative estimate in the future equates to 299 dwellings per year.

For future years’ windfalls, the assumption has been made that 300 dwellings will be delivered annually.

South Northamptonshire

The South Northamptonshire Five Year land supply report (2019) includes historic windfall delivery rates since 2001/02. An annual average of 250 windfall completions with an annual average of 113 dwellings on sites of less than 10 dwellings. This has increased to an annual average of 327 since 2011/12. To take into account the historical evidence a windfall allowance of 75 dwellings per annum has been included in the calculation of 5 year housing land supply in South Northamptonshire.

The inclusion of a windfall allowance is clearly well established within each area and the evidence established through the HLA process will be used within this assessment, as appropriate, mindful that the aim of this assessment is to look at strategic sites.

Stage 4 – Assessment review

- 2.33 Once the sites have been surveyed and assessed, an indicative housing trajectory will be produced setting out how much housing supply could be provided during each part of the plan period e.g. 5-10 year blocks. This will be used for the purposes of this assessment only and will not take the place of the trajectory as part of the Council's respective Housing Land Availability Reports (which are updated annually).
- 2.34 If insufficient sites have been identified to meet whatever the determined needs are for housing and employment, the Council will revisit the assessment, including the assumptions on yields on individual sites. If, following this review, there are still not enough sites, then it will be necessary to investigate how this shortfall could be planned for including liaising with authorities that adjoin West Northamptonshire under the Duty to Cooperate.

Stage 5 – Final evidence base

- 2.35 The SLAA will be published as part of the evidence base alongside the West Northamptonshire Strategic Plan. In line with the guidance in the PPG, it will include a set of standard outputs, including a list of all sites considered, cross referenced to maps showing their locations subdivided into;
- A) Sites that have been rejected at stage 1: Including reasons why they have been rejected.
- B) Sites that have been assessed including an assessment of each site in terms of
- its suitability, availability and achievability to determine whether and when it could realistically be developed

- the types and quantities of development that could reasonably be delivered, including an estimate of build out rates, any barriers to delivery and whether these could be overcome.

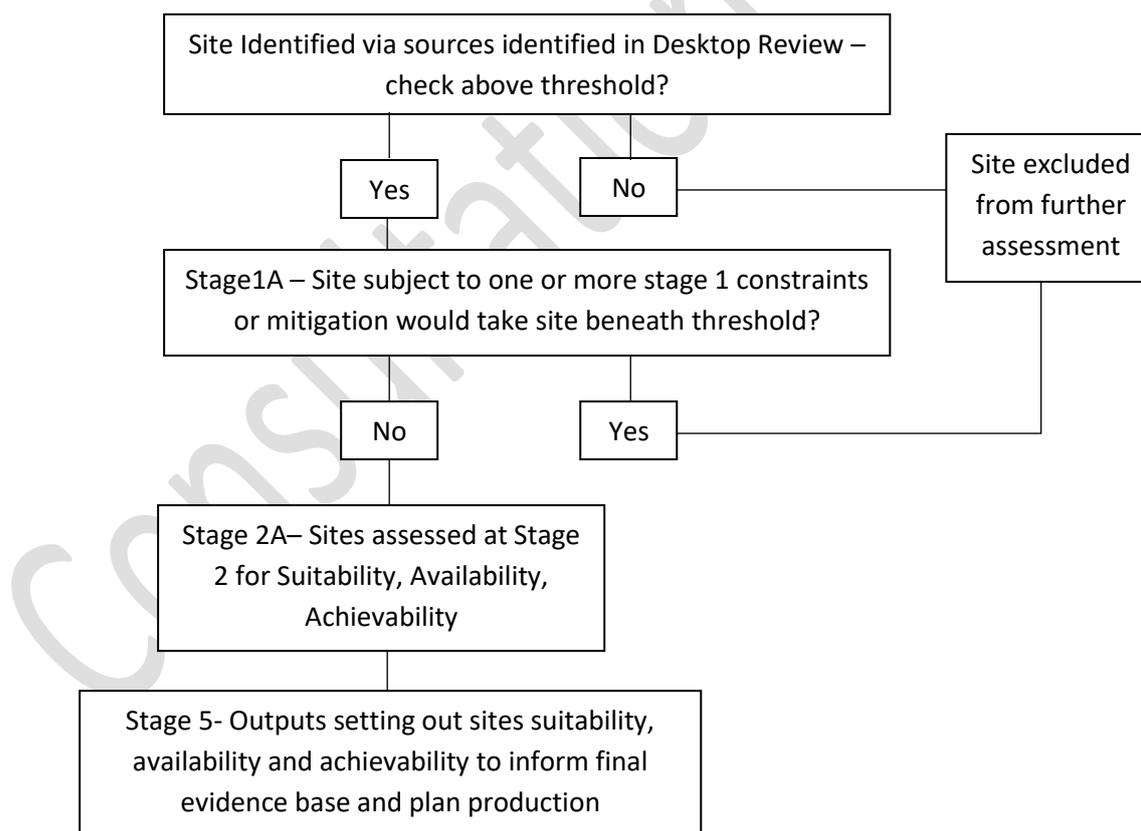
C) Sites that were too small:

These will be assessed in subsequent assessments as part of the work on Part 2 plans.

D) Sites to meet the needs of West Northamptonshire but outside of West Northamptonshire

The SLAA will also include an indicative trajectory of anticipated housing and other development

2.36 The following flow diagram helps indicate how sites proceed through the assessment process with the stage numbering corresponding to the flow diagram set out in the PPG (page 5).



2.37 The SLAA will be publicly available to view on the West Northamptonshire Joint Planning Unit website. The SLAA will also be reviewed as required.

Appendix 1 – SLAA Panel

Terms of Reference

TO BE CONFIRMED

Panel Members

TO BE CONFIRMED

Consultation Draft