



Planning Policy Committee 8th June 2020

Annual Position Statement – updated Five Year Housing Land Supply for the district, 1st April 2019

Purpose of report

This report is the Annual Position Statement, to update Members on East Northamptonshire Council's current five year housing land supply situation, as at 1st April 2019.

Attachment

Appendix 1: Land rear of 7-12 The Willows, Thrapston – reference APP/G2815/W/19/3232099; determined 24th January 2020

Appendix 2: Methodology and justification for calculating the five year housing land supply, for the 2019 Authorities Monitoring Report (AMR)

Appendix 3: Schedule of Sites included in the Five Year Housing Land Supply Calculation (amended 8 January 2020)

Appendix 4: Housing delivery 2011-19, compared to North Northamptonshire Joint Core Strategy 2011-2031 trajectory

Appendix 5: Updated five year housing land supply calculations (amended 8 January 2020)

1.0 Background

- 1.1 National planning policy requires local planning authorities to identify sufficient specific deliverable sites to deliver housing for a period of five years. This policy requirement is colloquially referred to as the “five year housing land supply” and entails the production of an “Annual Position Statement” (APS), setting out the five year housing land supply position at 1st April each year.
- 1.2 The Council's five year land supply for the period to 1st April 2019 was agreed by the Planning Policy Committee on 17th December 2019 (Item 8). The position reported to the Committee on that date identified a five year land supply (6.03 years); this figure was subsequently challenged by Lourett Developments Ltd through a Planning Appeal case (Appendix 1: Land rear of 7-12 The Willows, Thrapston – [18/02459/OUT](#); appeal reference APP/G2815/W/19/3232099). This proposal, to erect four dwellings on redundant land, was considered at an informal hearing on 8th January 2020.
- 1.3 On the 24th January 2020 the Planning Inspector upheld the Appeal and reduced the Council's housing land supply from 6.03 years to 4.28 years. The reduction in the figure was significant, in that falling below the Government's requirement for demonstrating a five year supply of deliverable housing sites the Council could become vulnerable to speculative planning applications, rather than plan led proposals.
- 1.4 Following the Inspectors decision, on 6th March 2020 the Council submitted a Statutory Planning Appeal to the High Court. Having considered the Council's robust application, the Secretary of State conceded that the Inspector:

'...had erred in his interpretation of the definition of deliverable within the glossary of the National Planning Policy Framework ("NPPF") as a 'closed list'. It is not. The proper interpretation of the definition is that any site which can be shown to be 'available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years' will meet the definition; and that the examples given in categories (a) and (b) are not exhaustive of all the categories of site which are capable of meeting that definition. Whether a site does or does not meet the definition is a matter of planning judgment on the evidence available'.

1.5 Following this, on the 12th May 2020 the Council agreed a Consent Order with both the Secretary of State and Lourett Developments for consideration by the High Court. All parties agreed that it was appropriate for the Court to make an Order quashing the decisions of the Planning Inspector and remitting the appeal to be determined again. The High Court has yet to consider the agreed Consent Order and determine the matter.

1.6 On the basis that the appeal decision has now been quashed, this report provides an updated APS. It amends that previously agreed by the Planning Policy Committee on 17th December 2019. It should be read in conjunction with the 17th December 2019 report (Item 8). Appendix 2 to this report provides sets out the methodology and an updated justification for calculating a five year housing land supply.

2.0 Changes to the housing land supply, as presented to the appeal hearing on 8th January 2020 (Land rear of 7-12 The Willows, Thrapston – 18/02459/OUT)

2.1 The Council presented an updated position statement to the "Willows" appeal hearing on 8th January 2020, in response to the Lourett Development's (the appellant) list of disputed housing sites. This conceded a small number of sites from the Council's housing land supply, equating to 72 dwellings. However, on the same basis the list of deliverable sites was updated by the following additions:

- Increased capacity (+30 dwellings) at an existing committed site; and
- Addition of a new 'Category (b)' site (+100 dwellings), that was not previously regarded as deliverable in the 2019 Annual Position Statement

2.2 The net effect of these changes is to increase the deliverable supply by 58 dwellings. Notwithstanding, the Inspector's Report rejected the Council's overall approach to defining a 'deliverable' housing site, concluding that:

"Much of the discrepancy can be put down to the Council not adhering to the definition of what constitutes a deliverable site in the Framework...This is a significantly flawed approach as the definition of 'deliverable' in the Framework is a closed list [The appellant has referred to case law reinforcing this point]. At least 774 homes can immediately be removed from the Council's housing land supply. This alone means the Council is unable to demonstrate a five-year housing land supply, the supply being in the region of 4.28 years" (paragraph 36).

2.3 A key issue of the dispute also relates to the definition of what constitutes a deliverable site:

"During the hearing I heard evidence on the deliverability of some of the Category B

sites (those with outline permission or allocated in the development plan) relied upon by the Council to demonstrate a five-year housing land supply. However, as will be apparent, it is enough to work with the 4.28-year figure for the purposes of my assessment” (paragraph 37)

2.4 The Inspector’s Report did not provide any direction regarding the Council’s evidence for the deliverability of individual sites, other than to confirm that debate had taken place during the proceedings. In the absence of any further guidance from the Inspector, it is argued that the Council’s methodology for the 2019 AMR (previously agreed by the Planning Policy Committee on 17th December 2019; updated at Appendix 2) remains an appropriate and defensible approach for determining the deliverability of individual sites within the housing land supply.

2.6 A consequence of the Secretary of State’s decision to quash the Willows appeal decision is that an updated position statement has been prepared. This has been undertaken on the basis of the Council’s updated evidence put forward at the informal hearing on 8th January 2020.

3.0 Updated assessment of the current five year housing land supply position (1st April 2019)

3.1 Much of the debate during the informal hearing for the “Willows” appeal on 8th January 2020 related to the deliverability (or otherwise) of individual sites that were included within the Council’s five year land supply calculations. In light of this latest evidence, officers have reassessed the Council’s Housing Land Supply position to take account the Inspector’s findings, applying the following assumptions:

- The adopted JCS (Local Plan Part 1; Policy 28/ Table 4) provides the basis for calculating the five year housing land supply.
- The total deliverable supply equates to **2,718 dwellings**; basic supply 2,595 dwellings, plus 123 dwellings windfall allowance (appendices 3 and 5).
- Assessment of delivery rates during the 2011-19 monitoring period has identified an excess of **134 dwellings** against the JCS requirement for the same period (Appendix 4). This would entail a five year land supply requirement of **2,100 dwellings** (i.e. 420 dwellings per year) for the 2019-24 monitoring period; with 401 dwellings per year thereafter.
- Given that housing completions currently exceed the JCS requirement for the monitoring period (2011-19), the NPPF requires that a 5% buffer (contingency) should be applied in calculating the five year housing land supply (Appendix 5). Therefore, the five year land supply requirement would equate to **2,205 dwellings** (441 dwellings per year), inclusive of the 5% buffer.

4.0 Conclusion – the five year housing land supply, calculated for East Northamptonshire

4.1 This report summarises the process that has been undertaken in calculating the five year housing land requirement. The five year housing land supply has been calculated on the basis of the assumptions in section 3.0 (above)

4.2 During the 2018-19 monitoring year, **473 dwellings** were delivered. These completions positively illustrate the continued housing delivery against the JCS requirement (420 dwellings per year; 3,360 dwellings 2011-19), to the extent that

completions during the plan monitoring period (2011-19) exceed the requirement by over 130 dwellings, as at 1st April 2019. This assumes a deliverable housing land supply of 2,718 dwellings compared to requirement of 2,205 dwellings; equating to **6.16 years** supply (2418/2205 x 5).

- 4.3 The committee is asked to review and note the list of sites included in the latest Housing Site Schedule (Appendix 3), with reference to amendments to the list of allocated sites and emerging sites at the foot of the Schedule, previously agreed by the Planning Policy Committee on 17th December 2019 (Item 8); i.e. sites that did not have extant planning permissions as at 1st April 2019.

5.0 Equality and Diversity Implications

- 5.1 This report is purely for information and requires no decision from committee. There are no equality and diversity implications arising from this report.

6.0 Privacy Impact Implications

- 6.1 There are no privacy impact implications arising from this report.

7.0 Health Impact Assessments

- 7.1 There is no need to prepare a health impact assessment relating to this report as the purpose of it is just to make Members aware of the current housing land supply position for the District, as at 1st April 2019.

8.0 Legal Implications

- 8.1 There are no legal implications arising from the proposals. There is no longer a legal requirement to submit a "Local Development Framework Annual Monitoring Report" to the Secretary of State.

9.0 Risk Management

- 9.1 It is a requirement of the NPPF that local planning authorities demonstrate a five year deliverable supply of housing land. Should East Northamptonshire Council be unable to fulfil this requirement, then it is likely that the authority would find itself having to challenge unwanted or inappropriate development through the planning appeals process.

- 9.2 The JCS (Local Plan Part 1) was adopted on 14th July 2016, on the basis that the North Northamptonshire housing requirement (35,000 dwellings, of which 8,400 are allocated to East Northamptonshire). This represents the starting point (strategic policies), against which the five year housing land supply should be assessed (NPPF paragraph 73). While the Council is comfortably able to demonstrate well in excess of a deliverable five year land supply (6.16 years), it is possible that this may continue to be challenged through the submission of speculative planning applications. These risks are borne out by the recent "Willows" appeal case.

10.0 Resource and Financial Implications

- 10.1 There are no resource and financial implications arising from this report.

11.0 Constitutional Implications

11.1 There are no constitutional implications arising from this report.

12.0 Implications for our Customers

12.1 There are no customer service implications arising from this report.

13.0 Corporate Outcomes

13.1 The relevant Corporate Outcomes are:

- Good Quality of Life – sustainable development, strong communities and high quality built environment
- Effective Partnership Working – effective joint working with neighbouring local planning authorities through the North Northamptonshire Joint Planning Unit
- Effective Management – ensuring a continuous and sufficient deliverable housing land supply to meet local (district-level) housing needs.


14.0 Recommendation

14.1 The Committee is recommended to note the following:

- (1) Updated schedule of sites and phasing assumptions used in the calculation of the five year housing land supply figure (Appendix 3) which constitute the Council’s “Annual Position Statement”; to be included in the 2019 Authorities Monitoring Report.
- (2) Updated five year housing land supply calculation for 1st April 2019 against the submitted North Northamptonshire Joint Core Strategy (Policy 28/ Table 4): 6.16 years, applying a 5% buffer (Appendix 5).

(Reason – To provide a robust housing land supply position on which to base planning decisions)

14.2 This report is presented to the Planning Policy Committee for information only. No resolution is required by the Committee.

Legal	Power: Planning and Compulsory Purchase Act 2004 Localism Act 2011				
	Other considerations: Planning Practice Guidance – “Housing supply and delivery”, 22 nd July 2019: https://www.gov.uk/guidance/housing-supply-and-delivery				
Background Papers:		North Northamptonshire Joint Core Strategy 2011-2031 (adopted 14 th July 2016) “Annual Position Statement – calculating a Five Year Housing Land Supply for the district, for the 2019 Authorities Monitoring Report” (Planning Policy Committee, December 2019, Agenda Item 8): https://www.east-northamptonshire.gov.uk/meetings/meeting/1023/planning_policy_committee			
Person Originating Report:		Michael Burton, Principal Planning Policy Officer ☎ 01832 742221 ✉ mburton@east-northamptonshire.gov.uk			
Date: 01 June 2020					
CFO		MO		CX 28/05/20	



Appeal Decision

Hearing Held on 8 January 2020

Site visit made on 8 January 2020

by Graham Chamberlain, BA (Hons), MSc, MRTPI

an Inspector appointed by the Secretary of State

Decision date: 24th January 2020

Appeal Ref: APP/G2815/W/19/3232099

Land rear of 7 - 12 The Willows, Thrapston, Northamptonshire, NN14 4LY

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Lourett Developments Ltd. against the decision of East Northamptonshire District Council.
 - The application Ref: 18/02459/OUT, dated 19 December 2018 was refused by notice dated 28 February 2018.
 - The development proposed is residential development to erect four dwellings.
-

Decision

1. The appeal is allowed, and planning permission is granted for a residential development to erect four dwellings at Land rear of 7 - 12 The Willows, Thrapston, Northamptonshire, NN14 4LY in accordance with the terms of the application, Ref: 18/02459/OUT dated 19 December 2018, subject to the conditions set out in the attached schedule.

Preliminary Matters

2. The planning application was submitted in outline with all matters of detail reserved for future consideration save for 'access' and 'scale'. Drawings have been submitted with the application detailing the width and depth of each of the proposed dwellings. However, the appellant confirmed at the hearing that these should only be treated as presenting the potential maximum depth and width of the individual dwellings. This is because 'appearance' is a reserved matter and therefore the final form and size of the individual dwellings may be less than set out on the plans. I have considered the appeal on this basis.
3. Drawings have not been submitted confirming what the height of the proposed dwellings would be¹ and there is no reference to numeric dimensions in the submissions. The only reference is an indication that the dwellings could be two to three storeys. This is imprecise as there can be significant deviations in storey heights. The appellant therefore confirmed that 'scale', in so far as it relates to height, is not a matter before me. I have accepted this point and considered the proposal on this basis as it is possible to advance some aspects of a reserved matter for consideration but not others. For example, the access to a site may be advanced for assessment in an application but not the access within it, such as circulation routes.

¹ The drawings in Appendix 27 of the appellant's statement are indicative and thus not a firm proposal

4. The appellant originally signed Certificate A on the application form thereby confirming Lourett Development Ltd as the sole owner of the appeal site. It transpired that this was incorrect because there are two other freeholders. To address this, the appellant served notice on the freeholders and completed Certificate B. The appellant has therefore discharged the obligations imposed by The Town and Country Planning (Development Management Procedure) Order 2015 relating to the notice of planning permission.
5. During the hearing the Council produced late evidence (listed at the end of this decision). It was not extensive or overly technical and was capable of being dealt with by those present following a short adjournment. Accordingly, no party was significantly prejudiced when I accepted it. In addition, I requested the submission of evidence relating to the effect of the proposal on the Upper Nene Valley Gravel Pits Special Protection Area. I adjourned the hearing to enable me to consider this information, which was extensive, and consult Natural England. The hearing was subsequently closed in writing.
6. Applications for awards of costs were made by Lourett Developments Ltd against East Northamptonshire District Council and by East Northamptonshire District Council against Lourett Developments Ltd. These applications are the subject of separate Decisions.

Main Issues

7. The appeal was submitted with additional survey evidence relating to breeding birds and great crested newts. These details had originally been recommended as being necessary in the appellant's preliminary ecological appraisal and the absence of them had resulted in the Council's fourth reason for refusal. The Council's ecologist has reviewed the additional evidence and is content that it demonstrates protected species are unlikely to be present in the site and thus effected by the proposal. The Council has therefore withdrawn the fourth reason for refusal. I have no substantive evidence before me disputing the expert views of the ecologists advising the Council and appellant. Accordingly, this matter has been appropriately addressed by the additional evidence and therefore it is unnecessary for me to consider it further.
8. During the hearing the Council, Town Council and local residents confirmed that the developers of the Willows had originally intended to provide a public open space at the appeal site. However, due to the specific drafting of the planning obligation and a lack of monitoring, this never came to fruition. The appeal site is currently fenced off with no public access provided. The Council confirmed that there is no means of securing the appeal site as a public open space and therefore the enforcement investigation considering this matter was closed.
9. The Council accepted at the hearing that the appeal site has never been a public open space, that any public access to date has been informal and at the discretion of the landowner and there is no legal obligation on the appellant to provide public access. In the absence of such access, the appeal site cannot provide the public with important opportunities for sport and recreation and therefore cannot be considered an open space as defined in the National Planning Policy Framework (the 'Framework'), regardless of whether it offers a visual amenity. It therefore follows that the proposal would not result in the loss of open space. As such, the Council withdrew its fifth reason for refusal. Given what I heard at the hearing, I consider this was an appropriate course of action and therefore I have not considered this further.

10. Given the forgoing, the main issues in this appeal are:

- Whether the proposed development would be in a suitable location with reference to the relevant development plan policies concerned with the location of housing;
- Whether the proposed development would provide an appropriate mix of dwellings, including whether it would amount to an efficient use of land;
- The effect of the proposed development on the character and appearance of the area; and
- If there is a conflict with the development plan, whether there are other material considerations that indicate a decision should be taken other than in accordance with the development plan.

Reasons

Whether the proposed development would be in a suitable location with reference to development plan policies

11. In order to provide a planned approach to the location and extent of development that meets needs as locally as possible, Policy 11 of the North Northamptonshire Joint Core Strategy 2011 – 2031 (JCS) provides an overarching spatial strategy for the plan area. The broad aim is to direct development to urban and rural areas in a locally appropriate way.
12. Policy 11b) of the JCS refers to Market Towns such as Thrapston² and states that they will provide a strong service role for their local communities with growth in homes and jobs at an appropriate scale. Policy 11b) of the JCS should be read alongside the Rural North, Oundle and Thrapston Plan (RNOTP), which identifies several development sites for Thrapston. It also includes Policy 2, which permits windfall development within the defined settlement boundary of the town subject to criteria. The strategy in these policies makes no explicit provision for unallocated windfall development on the edge of Market Towns. The emerging Local Plan currently includes a specific policy dealing with windfall development on the edge of towns, but this is not at a stage of preparation where it can be afforded more than very limited weight.
13. Different criteria within Policy 11 of the JCS apply depending on whether a site is within an urban or rural area. However, the policy does not set out how the urban and rural areas should be differentiated and defined. For example, there is no reference in the policy to settlement boundaries as the means of doing this. Planning judgment is therefore required in the absence of any definition. A useful starting point in making this judgment is the settlement boundary placed around Thrapston in the RNOTP. This was identified following a rational assessment based on the criteria set out in Paragraph 4.5 of the plan.
14. Land on the periphery of towns has only been included in the settlement boundary where it is clearly distinct from the countryside. To this end the appeal site is not included in the settlement boundary of Thrapston, correctly in my view, because it has a rural appearance that provides a visual affinity with the river corridor. It is also beyond the rear elevations of the properties in The Willows, which functions as a discernible natural boundary of the town. As

² The Council erroneously referred to Policy 11a) in its reason for refusal, which relates to Growth Towns

such, the appeal site is in the open countryside, a finding supported by the appellant's Landscape and Visual Impact Assessment.

15. Given the foregoing finding that the appeal site is not within the urban area of Thrapston, the appeal site cannot be the type of windfall development supported by Policy 2 of the RNOTP and therefore it gains no support from that policy. Instead, the proposal falls to be considered against The Rural Areas criteria in Policy 11. To this end, no substantive evidence has been provided to demonstrate the proposal is required to support the rural economy or to meet a local need. It is not a rural diversification or the reuse of rural buildings. Moreover, the proposal would not represent the type of infilling permitted by Policy 11b, which relates to villages. Permitting infilling on the edge of towns would be to stretch the interpretation of the policy beyond what it says.
16. Policy 11d) states that other forms of development (those not referred to in the policy) will be resisted in the open countryside unless there are special circumstances as set out in Policy 13 of the JCS or national policy. There is nothing before me to suggest such special circumstances exist. Accordingly, the proposal would not be any of the types of development permitted by Policy 11 in the rural areas. The negative corollary being that the proposal is at odds with Policy 11 of the JCS.
17. In conclusion, the proposed development would not be in a suitable location when considering the relevant development plan policies concerned with the location of housing. As such, it would harmfully undermine the adopted spatial strategy and the consistency and relative certainty that should flow from a planned approach to the location of new development.

Whether the proposed development would provide an appropriate mix of dwellings

18. The 2015 Strategic Housing Market Assessment (SHMA) informed the JCS and demonstrated that the need in the market sector is for predominately smaller dwellings. It forecast that around 70% of new households would need 1-2-bedroom homes, 30% 3-bedroom and very few 4 or more. However, Paragraph 9.26 of the JCS recognises that it may not be advantageous to secure all housing as 1-3-bedroom properties and therefore it seeks to address the aspiration for additional bedrooms. To this end, the JCS indicates that a significant proportion of new homes (generally 70%) should be 1-3-bedroom properties with the remainder being larger, with proposals advocating a higher proportion of larger homes needing to be justified with evidence.
19. The above is encapsulated in Policy 30 of the JCS. It places an emphasis on the provision of small and medium sized dwellings, defined as properties with 1-3 bedrooms. This approach has regard to the findings of the SHMA whilst also allowing flexibility to provide larger aspirational homes. Policy 30 does not explicitly state that proposals should be refused if they fail to place an emphasis on smaller properties, but such a policy would not be positively prepared. There is a negative corollary that a mix at odds with that in Policy 30 will be at odds with the policy itself.
20. The Council has not suggested what an appropriate housing mix at the appeal site would be, but even in the absence of this clarification the appellant's initial suggestion that the proposal should provide four larger homes (4+ bedrooms) would clearly be contrary to Policy 30, as it would not place an emphasis on smaller homes (1-3-bedroom properties).

21. The appellant's justification behind the mix was not persuasive, advocating, without substantive evidence, that viability may be affected if smaller homes were proposed. However, as scale (in so far as it relates to height) and appearance are not before me the appellant convincingly argued at the hearing that the housing mix could be addressed at the reserved matters stage. For example, the proposal could entirely comprise of bungalows.
22. That said, even if bungalows were proposed the depth and width set out on the drawings would allow the dwellings to be larger three-bedroom properties or four-bedroom homes³. It is highly unlikely that any would be limited to 1 or 2 bedrooms given the likely floor area. That said, Policy 30 does not entirely rule out larger homes and it only defines smaller properties with reference to bedroom size and not floor area. Therefore, a mix with an emphasis on three-bedroom properties, even larger ones, alongside the provision of a four-bedroom home, need not be at odds with Policy 30.
23. Although not explicitly referred to in its second reason for refusal, the Council sought to develop an argument that the proposal would be an inefficient use of land because four large properties are proposed instead of a greater number of smaller homes. There is some traction to this argument because more homes could be provided within the built envelope of what is proposed, and little evidence has been submitted to suggest the access could not be delivered to an adoptable standard, thereby enabling more than four homes to be served off it. Even if it could not, the Highway Authority's indicative standard is for five homes to be served off a private drive. This could leave scope to increase the number of homes by at least one.
24. However, the access into the site would closely pass between the flank elevations of two homes. This would result in noise and disturbance to the occupants of these properties from passing traffic. On balance, I share the view of the Council that the activity from four homes would not be unreasonable. However, increasing the number of homes, even by one, would increase the impact and begin to tip the balance towards an unreasonable effect.
25. Moreover, the appeal site is on the edge of the town, where a tapering into the countryside can be advantageous to the character and appearance of the area. A lower site coverage and density can allow more opportunities for larger plots and gardens, and thus extra soft landscaping. This would provide a more sensitive and gentle transition from the urban area to the rural fringe. Accordingly, it seems to me that the number of homes proposed is about right to ensure the living conditions of neighbours are not unreasonably affected and the rural fringe character of the area respected. Consequently, the proposal would be an efficient use of land given the specific site constraints.
26. In conclusion, the proposal need not inherently result in a housing mix of larger properties. Instead, it would be possible to provide a mix that places an emphasis on smaller properties, thereby adhering to Policy 30 of the JCS.

The effect on the character and appearance of the area

27. The Willows is a small housing estate broadly characterised by repeated house types that are generally detached with driveways and garages and arranged within a conventional highway layout and design. This results in a suburban

³ The floorplans indicate the homes could have ground floors of around 86sqm-113sqm

- appearance, which is further reinforced by the position of the properties in diminutive clusters that branch off the main carriageway. The pattern of development is therefore one of small cul-de-sacs. The appeal scheme would broadly continue this arrangement, as it would amount to a small cluster of homes in a cul-de-sac accessed off the main carriageway. In this respect it would not jar with the overriding pattern of development in The Willows.
28. That said, the appeal scheme would be positioned in a 'back land' location as it would be behind Nos 7 - 12 The Willows. However, the houses need not appear discordant or unduly prominent from The Willows if their height (which is a reserved matter) is no greater than Nos 7-12 The Willows. This is because the existing properties would largely screen the new homes in views from The Willows thereby limiting their street presence.
29. Plot 2 would be the most prominent in views from The Willows, but it could be designed to appropriately punctuate the vista that would be created along the access drive. The indicative layout demonstrates that a feature cluster of trees, and landscaped front gardens, could also be used to further soften views.
30. The properties would have a similar depth to nearby houses but their width, particularly Plots 1 and 4, would be greater. Nevertheless, the homes could be articulated in the final design to lessen the impact of the massing. In addition, the proposed dwellings could also have similar finishing materials to nearby properties which would facilitate a complementary appearance that would integrate the dwellings into the street scene.
31. The appellant's LVIA demonstrates that the appeal scheme would have a limited visual envelope and therefore the urbanisation of the appeal site would have little visual impact beyond the immediate context of the site, thereby broadly preserving the wider landscape. Existing soft landscaping along the western boundary of the site would screen much of the development from the river corridor. The houses would be visible from the south/south west, but they would be viewed against the backdrop of housing in The Willows and Sedge Close. The development would not, therefore, appear as a discordant or unnatural incursion into the countryside. Moreover, there would be space along the southern boundary for a thick row of planting to provide further visual containment that would complement the existing planting along the western boundary of the site.
32. In conclusion, the proposal, subject to an appropriate reserved matters submission, would not inherently harm the character and appearance of the area and therefore a conflict with Policy 8 of the JCS, which seeks to secure development that responds to a site's context, need not occur.

Other Considerations

33. Paragraph 73 of the National Planning Policy Framework (the 'Framework') states that a local planning authority should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies. The JCS sets out the Council's housing requirement which, with a five percent buffer⁴, equates to 2205 homes over the five-year period (1 April 2019 to 31 March 2024). This is an annual requirement of 441 homes.

⁴ As required by Paragraph 73 of the Framework

34. The Framework defines what constitutes a 'deliverable' site for the purposes of a five-year housing land supply assessment. Category A sites in the definition are all minor sites with planning permission as well as all major sites with full planning permission. The second part of the definition sets out a list of certain types of site that can be considered deliverable if there is clear evidence that housing completions will begin within five years. The onus is on the Council to provide that evidence. These are sites with outline planning permission for major development, sites allocated in a development plan, sites with permission in principle or sites identified on a brownfield register.
35. The Council has recently published an Annual Position Statement approved by its Planning Policy Committee that suggests the housing supply over the relevant period is 2660 homes. This would amount to a 6.03-year supply⁵ against the housing requirement. The appellant has reviewed this and is of the view that the supply is nearer to 1269 homes, which is around 2.88 years.
36. Much of the discrepancy can be put down to the Council not adhering to the definition of what constitutes a deliverable site in the Framework. The Council has included sites allocated in the emerging Local Plan (around 549 homes) and unallocated unapproved development schemes that are likely to come forward on previously developed land in urban areas, two of which were discounted by the Council from the brownfield register⁶ (around 225 homes). This is a significantly flawed approach as the definition of 'deliverable' in the Framework is a closed list⁷. As such, at least 774 homes can immediately be removed from the Council's housing land supply. This alone means the Council is unable to demonstrate a five-year housing land supply, the supply being in the region of 4.28 years⁸.
37. During the hearing I heard evidence on the deliverability of some of the Category B sites (those with outline permission or allocated in the development plan) relied upon by the Council to demonstrate a five-year housing land supply. However, as will be apparent, it is enough to work with the 4.28-year figure for the purposes of my assessment.
38. Paragraph 11 of the Framework states that in situations where a Council cannot demonstrate a five-year housing land supply, permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole.
39. In this instance, the conflict with Policy 11 of the JCS would be the only adverse impact of the proposal. Policy 11 is a strategic policy that is broadly consistent with several of the Framework's aims, such as the promotion of sustainable transport, recognising the intrinsic character and beauty of the countryside and delivering a genuinely plan led planning system, which can include land use designations. In this instance, the land use designations being urban and rural areas, which are used as a means of guiding the location and quantum of development to maximise its benefits and minimise its impacts.
40. However, a rigorous application of Policy 11 of the JCS would frustrate attempts to address the Council's current housing deficit. Settlements such as

⁵ 2660/441

⁶ Former Abbott House residential Home and Gells, 35 High Street – together these sites account for 14 homes

⁷ The appellant has referred to case law reinforcing this point

⁸ (2660-774)/441

Thrapston are well placed to accommodate additional homes given the services available, a point made in Policy 11 1b) of the JCS. In this respect, the appeal site, although outside the settlement boundary of Thrapston, and thus in a rural area, is very well connected to several facilities in the town centre.

41. Moreover, I have not been presented with substantive evidence to suggest the housing deficit can be remedied without releasing land outside settlement boundaries. If sites in the rural area must be released, then the appeal site is a good candidate given the absence of technical harm in respect of matter such as landscape impact, highway safety and flood risk. In the circumstances, the conflict with Policy 11 of the JCS is of moderate weight.
42. When considering the benefits of the appeal scheme, the proposal would provide some modest support to the construction industry and to the local economy through the subsequent spend of future occupants. However, given the modest scale of the development these benefits would carry limited weight, particularly as I have seen nothing of substance to suggest the contribution from future residents would make a significant difference to the local economy or the vitality of the community.
43. Similarly, the small size of the development means the contribution to housing land supply would be modest. Nevertheless, this attracts moderate weight given the housing supply shortfall. Overall, the benefits of the proposal are cumulatively of moderate weight. Thus, the moderate adverse impact of the appeal scheme would not significantly and demonstrably outweigh the moderate benefits. This is a material consideration that indicates the proposal should be determined other than in accordance with the development plan.

Other Matters

44. I share the view of the Council and Local Highway Authority that the use of the access would not harm highway safety because it would have a suitable width with adequate visibility. The development can be designed at the reserved matters stage to deliver satisfactory levels of parking and an appropriate refuse strategy. Moreover, with layout and height being reserved matters there is scope to design a scheme that would not harm the outlook, level of light and privacy of the occupants in The Willows. I understand that a gas main passes through the site, and wires over it, but these are constraints for the developer to address with the owners and operators of this infrastructure. Land contamination can be addressed through planning conditions.
45. Reference has been made to the Council's emerging Local Plan Part 2, but this has not been subject to examination and is therefore open to potentially significant changes. As such, it has limited non determinative weight. The Flood Risk Assessment has demonstrated that the houses can be sited within Flood Zone 1 and therefore the sequential test is not required. Substantive evidence is not before me to suggest the proposal would harm the aims of the Nene Valley Nature Improvement Area.
46. The Upper Nene Valley Gravel Pits is designated as a Special Protection Area (SPA). The Conservation of Habitats and Species Regulations 2017 requires that where a plan or project is likely to result in a significant effect on a European site such as a SPA, and where the plan or project is not directly connected with or necessary to the management of the European site, as is the case here, a competent authority is required to make an Appropriate

Assessment of the implications of that plan or project on the integrity of the European site in view of its conservation objectives

47. The qualifying features underpinning the SPA designation is the concentration of Great Bittern, Gadwell and European golden plover. The conservation objectives for the SPA can be summarised as ensuring that the integrity of the site is maintained or restored as appropriate so that it continues to support the population and distribution of its qualifying features.
48. Natural England's (NE) supplementary advice on conserving and restoring the site features of the SPA⁹ identifies recreational disturbance as one of the principle threats to the birds. Research evidence referred to in the Council's Upper Nene Valley Gravel Pits SPA Supplementary Planning Document 2015 (SPD), undisputed by the appellant, supports this conclusion. As does NE's consultation response. The presence of people can disturb the birds and dog walking can be particularly problematic in this regard, especially if dogs are let off their lead.
49. The appeal scheme would facilitate a permanent increase in the number of people living within a 'zone of influence' around the SPA and thus within a short journey of it. The SPA is an interesting and attractive semi-natural area and is therefore somewhere the future residents of the proposed homes would likely wish to visit for recreation, thereby increasing the risk of harmful recreational pressure. This would provide a pathway of effect for recreational disturbance. Accordingly, and when following a precautionary approach, the proposal, in combination with other plans and projects, would be likely to have a significant effect on the SPA. There is no evidence before me to suggest the proposal would have any other effects on the SPA.
50. NE, as the Statutory Nature Conservation Body (and the Council) have referred to the SPD, which sets out a mitigation strategy. This involves developers providing an evidence based financial contribution per dwelling that is used for Strategic Access Management and Monitoring at the SPA, such as fencing, screening and wardens. Such management will minimise the risk of recreational disturbance upon the qualifying features.
51. The appellant has paid the financial contribution to the Council in line with the methodology in the SPD¹⁰. In the absence of a planning obligation there is no legal requirement upon the Council to spend the money in the way envisaged, but as a responsible public authority with a publicly stated position and strategy, I am satisfied that they will. The overall approach, and the level of the financial contribution, is supported by NE. Thus, with this mitigation the proposal would not adversely affect the integrity of the SPA, as its condition need not deteriorate as a result of the appeal scheme.

Conditions

52. I have had regard to the advice in the Planning Practice Guide and the conditions suggested by the Council. In the interests of certainty, it is necessary to secure details of the reserved matters and for the proposal to be implemented in accordance with them. In the interests of minimising the risk of flooding it is necessary to secure the implementation of the measures set out in the FRA. To safeguard living conditions, it is necessary to impose conditions

⁹ See Planning Practice Guide (PPG) Paragraph: 002 Reference ID: 65-002-20190722

¹⁰ A receipt has been provided as has a copy of the Habitats Mitigation Contribution Agreement

relating to land contamination and construction. In the interests of highway safety, it is necessary to secure parking and an appropriate surface treatment, pedestrian visibility splays, highway drainage and details of any gates.

53. As appearance and landscaping are reserved matters it is unnecessary to secure details of external materials, boundary treatment and levels. The burning of construction material can be dealt with through other legislation, with reference made to the Environmental Protection Act at the hearing. As such, a condition along these lines is not necessary to make the development acceptable.

Conclusion

54. The proposed development would not adhere to the development plan but material considerations, namely the Framework, indicate that the appeal should be determined other than in accordance with the development plan. Accordingly, the appeal has succeeded.

Graham Chamberlain
INSPECTOR

APPEARANCES

FOR THE APPELLANT

Brett Mosely	Appellant
Kilian Garvey	Kings Chambers
Andrew Grey	Atchinson Raffety
Neil Tiley	Pegasus Group

FOR THE LOCAL PLANNING AUTHORITY

Roz Johnson	East Northamptonshire DC
Michal Burton	East Northamptonshire DC
Dez Tanser	East Northamptonshire DC

INTEREST PARTIES

Peter Theakston	Local Resident
Chris Otterwell	Thrapston Town Council
Val Carter	Thrapston Town Council (and East Northamptonshire District Cllr)

DOCUMENTS SUBMITTED AT THE HEARING

By the Council

Doc 1 Appeal Decision APP/G2815/W/19/3230410
Doc 2 Appeal Decision APP/G2815/W/19/3235142
Doc 3 Council's Five-Year Housing Land Supply Update

By the Council upon my request

Doc 4 Comments from the Environment Agency (in full)
Doc 5 Plan of the Upper Nene Valley Gravel Pits SPA
Doc 6 Habitats Mitigation Contribution Agreement
Doc 7 Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document
Doc 8 Addendum to the SPA SPD: Mitigation Strategy
Doc 9 Natural England's consultation response to the Council

By Mr Theakston

Doc 10 Letter from Bramble Homes dated 14 April 2005 and accompanying plan

Schedule of Planning Conditions

1. Approval of the details of scale (in so far as it relates to height), layout, appearance and landscaping (hereinafter called "the reserved matters") shall be obtained from the Local Planning Authority in writing before the development is commenced.
2. Application for the approval of the reserved matters must be made not later than the expiration of three years beginning with the date of this permission.
3. The development to which this permission relates shall be begun before the expiration of two years from the date of approval of the last of the reserved matters to be approved.
4. The development shall be carried out in accordance with the submitted flood risk assessment (FRA) (Ref: 120-FRA-01-C) dated October 2018 and the following mitigation measures it details:
 - Finished floor levels shall be set no lower than 30.83 metres above Ordnance Datum (AOD).

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

5. No demolition or construction work (including deliveries to or from the site) that causes noise to be audible outside the site boundary shall take place on the site outside the hours of 08:00 and 18:00 Mondays to Fridays and 08:00 and 13:00 on Saturdays, and at no times on Sundays or Bank Holidays unless otherwise agreed with the local planning authority.
6. During site clearance and construction phases the developer shall provide, maintain and use a supply of water and means of dispensing it, to dampen dust in order to minimise its emission from the development site. The developer shall not permit the processing or sweeping of any dust or dusty material without effectively treating it with water or other substance in order to minimise dust emission from the development site. The developer shall provide and use suitably covered skips and take other suitable measures in order to minimise dust emission to the atmosphere when materials and waste are removed from the development site
7. Prior to the commencement of piling operations, a scheme for the control and mitigation of noise, including vibration, affecting surrounding premises shall be submitted to, and approved in writing, by the local planning authority. Such measures shall operate throughout the piling operations in accordance with the approved details or amendments which have been submitted to and approved in writing by the Local Planning Authority.
8. The development hereby permitted shall not be commenced until details of a comprehensive contaminated land investigation has been submitted to and approved by the Local Planning Authority (LPA) and until the scope of works approved therein have been implemented where possible. The assessment shall include all of the following measures unless the LPA dispenses with any such requirements in writing:

a) A Phase I desk study carried out by a competent person to identify and evaluate all potential sources of contamination and the impacts on land and/or controlled waters, relevant to the site. The desk study shall establish a 'conceptual model' of the site and identify all plausible pollutant linkages. Furthermore, the assessment shall set objectives for intrusive site investigation works/ Quantitative Risk Assessment (or state if none required). Two full copies of the desk study and a non-technical summary shall be submitted to the LPA without delay upon completion.

b) A site investigation shall be carried out to fully and effectively characterise the nature and extent of any land contamination and/or pollution of controlled waters. It shall specifically include a risk assessment that adopts the Source-Pathway-Receptor principle and takes into account the sites existing status and proposed new use. Two full copies of the site investigation and findings shall be forwarded to the LPA.

This must be conducted in accordance with the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR11'.

9. Where the risk assessment identifies any unacceptable risk or risks, an appraisal of remedial options and proposal of the preferred option to deal with land contamination and/or pollution of controlled waters affecting the site shall be submitted to and approved by the LPA. No works, other than investigative works, shall be carried out on the site prior to receipt and written approval of the preferred remedial option by the LPA.

This must be conducted in accordance with DEFRA and the Environment Agency's 'Model procedures for the Management of Land Contamination, CLR11'. Reason: To ensure the proposed remediation plan is appropriate.

10. Remediation of the site shall be carried out in accordance with the approved remedial option.
11. On completion of remediation, two copies of a closure report shall be submitted to the LPA. The report shall provide verification that the required works regarding contamination have been carried out in accordance with the approved Method Statement(s). Post remediation sampling and monitoring results shall be included in the closure report.
12. If, during development, contamination not previously considered is identified, then the LPA shall be notified immediately, and no further work shall be carried out until a method statement detailing a scheme for dealing with the suspect contamination has been submitted to and agreed in writing with the LPA.
13. a. Prior to first use or occupation of the development hereby permitted, the means of access shall be paved with a hard-bound surface for at least the first 10m from the highway boundary. Such surfacing shall thereafter be retained and maintained in perpetuity. The maximum gradient over a 5m distance (from the highway boundary) shall not exceed 1 in 15.
- b. Prior to first use or occupation of the development hereby permitted, pedestrian visibility splays of at least 2m x 2m shall be provided on each side of the vehicular access. These measurements shall be taken from and along the highway boundary. The splays shall thereafter be permanently retained and kept free of all obstacles to visibility over 0.6 metres in height above access/footway level.

c. Prior to first use or occupation, the proposed vehicular access and parking facilities shall be provided in accordance with the approved plans and shall thereafter be set aside and retained for those purposes.

d. Prior to first use or occupation, suitable drainage shall be provided at the end of the driveway to ensure that surface water from the vehicular access does not discharge onto the highway or adjacent land.

e. No gate(s), barriers or means of enclosure shall be erected within 8m of the highway boundary. Any such feature erected beyond that distance should be hung to open inwards only. The gates shall be retained as such thereafter.

Appendix 2: Methodology and justification for calculating the five year housing land supply, for the 2019 Authorities Monitoring Report (AMR)

1.0 Introduction

- 1.1 National planning policy (the National Planning Policy Framework, updated February 2019) requires local planning authorities to identify sufficient specific deliverable sites to deliver housing for a period of five years. This policy requirement is colloquially referred to as the “five year housing land supply”.
- 1.2 The National Planning Policy Framework (NPPF) highlights that: “*where...the policies which are most important for determining the application are out-of-date*”, planning permission should be granted unless “*any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework [the NPPF] taken as a whole*” (paragraph 11(d)). In in this scenario, the NPPF (footnote 7), explains that if East Northamptonshire Council is unable to demonstrate a five year housing land supply, then national policy (NPPF) may override adopted Local Plan policy.
- 1.3 The NPPF and Planning Practice Guide (PPG) provide direction as to how a local planning authority should demonstrate a five year housing land supply. Crucially, the NPPF requires that: “*Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies*”, plus a 5% buffer to ensure choice and competition in the market for land (paragraph 73). In the case of East Northamptonshire, the strategic housing requirement is set out in the North Northamptonshire Joint Core Strategy (JCS) 2011-2031, Policy 28/ Table 4.
- 1.4 Furthermore, the NPPF and PPG sets out additional challenges, including requirements for 10% and 20% buffers where delivery has fallen below 95% and 85% respectively, of the JCS housing requirement (PPG, paragraph 022); the Government’s Housing Delivery Test (first introduced through the updated NPPF, July 2018). The NPPF directs that where either of these trigger thresholds have been reached over the previous three monitoring years, then in practice this equates to the Government’s definition for “significant under delivery”. The NPPF and PPG entail increases to the housing requirements if set triggers are met (i.e. 95% or 85%), in order to improve the prospect of achieving the planned supply (paragraph 73(c)).
- 1.5 The 2nd NPPF update (February 2019) reiterates the importance for local authorities to maintain a deliverable five year housing land supply. It is therefore critical that the Council’s five year land supply assessment is underpinned by a robust methodology and evidence base. This report has been prepared to inform the 2019 North Northamptonshire Authorities Monitoring Report (AMR); which is expected to be published by spring/ summer 2020 and will set out the Council’s latest five year housing land supply calculations.
- 1.6 Calculating a five year land supply is a stepped process. This paper sets out the stages that have been undertaken in calculating an updated five year housing land supply for the 2019 AMR:
 1. Assessing current performance against the North Northamptonshire Joint Core Strategy (JCS) 2011-2031 target (8400 dwellings, 2011-2031);

2. Defining 'deliverable' and 'developable' sites in a local context in accordance with the national definition, for inclusion within the five year supply of deliverable housing land (2019-24);
3. Setting site specific trajectories;
4. Planning Practice Guidance – Housing supply and delivery (July 2019)
5. Calculating the five year housing land supply for the District.

2.0 Assessing current performance against the North Northamptonshire Joint Core Strategy (JCS) 2011-2031 target (8400 dwellings, 2011-2031)

2.1 The North Northamptonshire JCS (Local Plan Part 1 – strategic policies) defines the overall housing requirement for the Plan period. JCS Policy 28/ Table 4, set out a requirement of 8400 dwellings over 20 years:

- 420 dwellings per annum (dpa); or
- 2100 dwellings over five years.

2.2 Collation of the latest monitoring data reveals that, as at 1 April 2019, **3494 dwellings** had been completed (2011-19), against the JCS target of 8400 dwellings (2011-2031). This leaves a balance, for **4906 dwellings** to be delivered over the next 12 years (mean 409 dwellings per year).

3.0 Defining 'deliverable' and 'developable' sites in a local context in accordance with the national definition, for inclusion within the five year supply of deliverable housing land (2019-24)

3.1 The Council's latest published Housing Site Schedule was agreed by the Planning Policy Committee on 17th December 2019 ([Item 8, Appendix 3](#)). This included the following types of site within the deliverable housing land supply:

- "Starts"; i.e. sites with permission and units under construction at the time of monitoring visits (spring/ autumn 2019);
- Extant planning permissions, as at 1 April 2019;
- Major planning applications with a resolution to grant subject to s106, as at 1 April 2019 (e.g. Irthlingborough West);
- Adopted development plan site allocations (1996 District Local Plan, 2011 Rural North, Oundle and Thrapston Plan (RNOTP), Neighbourhood Plans and Rushden East sustainable urban extension);
- Emergent development plan site allocations (i.e. draft Neighbourhood Plan/ Local Plan Part 2 allocations);
- Emerging Rural Exceptions housing schemes; and
- Specific unallocated brownfield sites (e.g. Former factory, Oakley Road, Rushden; identified in the Brownfield Land Register).

3.2 The deliverable housing land supply also includes an additional 123 dwellings "windfall allowance", covering years 3, 4 and 5 of the five year monitoring period. This reflects the continuing delivery of small scale windfall or infill development sites (average 41 dwellings per year), which will inevitably continue to come forward.

- 3.3 The types of site included within the deliverable housing land supply were challenged by Lourett Developments Ltd through a recent appeal case ([18/02459/OUT](#); Land rear of 7-12 The Willows, Thrapston – Planning Inspectorate reference APP/G2815/W/19/3232099, 24 January 2020). The appellant’s evidence centred upon what constitutes a ‘deliverable’ housing site.
- 3.4 To a significant extent, the Inspector concurred with the appellant, concluding that: “*Much of the discrepancy can be put down to the Council not adhering to the definition of what constitutes a deliverable site in the Framework*” (APP/G2815/W/19/3232099, paragraph 36). The Inspector ruled that the definition of ‘deliverable’ in the Framework is a “closed list”; such that 774 dwellings should be removed from the Council’s housing land supply, thereby reducing the housing land supply to 4.28 years.
- 3.5 The Council successfully challenged the appeal decision (6 March 2020); with the Secretary of State having conceded to judgment, on the basis that the Council’s interpretation of the word ‘deliverable’ is correct. This decision effectively quashes the Inspector’s findings at paragraph 36 of his report; such that the Secretary of State has overruled the Planning Inspector and endorsed the Council’s overall approach to assessing site deliverability.
- 3.6 The national definition for a ‘deliverable’ site’ is set out at Annex 2 of the [NPPF](#). Further direction is provided through the national Planning Practice Guidance (PPG), [Housing supply and delivery](#), 22 July 2019 (paragraph 007). The new national definition, together with the subsequent guidance provided by the PPG, has required sites to be comprehensively re-categorised. Table 1 (below) provides a revised list of site typologies, which together make up the deliverable and developable supply.

Table 1: Revised site categories, applying NPPF/ PPG definitions
<p>Category A – Deliverable sites; i.e. included within the five year housing land supply, 2019-24:</p> <ol style="list-style-type: none"> 1. <i>Sites with full planning permission (unless there is clear evidence that homes will not be delivered within 5 years);</i> 2. <i>Minor sites (<10 dwellings) with outline planning permission.</i>
<p>Category B – Developable sites (that is, a suitable location, with a reasonable prospect that these will be available and could be viably developed within the current Local Plan period, by 2031), but included within the deliverable supply (2019-24) where sufficient evidence is available to demonstrate deliverability¹:</p> <ol style="list-style-type: none"> 3. <i>Have outline planning permission for major development (10 dwellings or more); i.e. issued, or a resolution to grant;</i> 4. <i>Minor development plan (Neighbourhood Plan) site allocations (<10 dwellings);</i> 5. <i>Major development plan (Local/ Neighbourhood Plan) site allocations (10 dwellings or more);</i>

¹ In the Council’s December 2019 Annual Position Statement, evidence regarding the deliverability of Category B sites was put forward in Appendix 2 (Site deliverability matrix). This Matrix was prepared in accordance with the latest (PPG) guidance, and is considered to provide a proportionate evidence base to demonstrate the deliverability of Category B sites which are counted within the five year housing land supply.

Table 1: Revised site categories, applying NPPF/ PPG definitions

6. *Have a grant of permission in principle (PIP); or*
7. *Are identified on a brownfield register.*

Category C – Emerging sites (that is, a suitable location, with a reasonable prospect that these will be available and could be viably developed within the current Local Plan period, by 2031), but included within the deliverable supply (2019-24) where sufficient evidence is available to demonstrate deliverability²:

8. *Windfall sites (e.g. brownfield land within existing built up areas) with a current planning application or a recent favourable pre-application enquiry; or*
9. *Emerging development plan allocations (Local/ Neighbourhood Plan), including where sites are not, as yet confirmed at the monitoring base date by way of a “made” Neighbourhood Plan.*

- 3.7 In all cases Category A sites are included within the deliverable housing land supply; in accordance with the general presumption of deliverability. In many cases, Category B or C sites may also be included, where the evidence summarised at the December 2019 Annual Position Statement (Planning Policy Committee, 17th December 2019, [Item 8, Appendix 2](#)) and reviewed at the Willows informal appeal hearing (8 January 2020) satisfactorily demonstrates that a site may be regarded as deliverable.
- 3.8 During the Willows appeal hearing (8th January 2020), the Council made a small number of concessions regarding the deliverable supply. These concessions were offset by the inclusion of additional supply at committed (Category A or B) sites that had not previously been counted within the deliverable supply.

4.0 Setting site specific trajectories

- 4.1 As for previous housing land supply assessments, the Housing Site Schedule (Planning Policy Committee, 17th December 2019, [Item 8, Appendix 3](#)) was prepared on the basis of an annualised trajectory; providing a forecast for housing delivery to 2031.
- 4.2 The Annual Position Statement (Appendix 1), set out a range of indicative standards regarding annual delivery rates for sites greater than 200 dwellings:
 - Sites with full planning permission could be anticipated to deliver around 200 dwellings within five years;
 - Sites with outline planning permission or a resolution to grant permission could be anticipated to deliver around 150 dwellings within five years;

² In the Council’s December 2019 Annual Position Statement, evidence regarding the deliverability of emerging (Category C) sites was put forward in Appendix 2 (Site deliverability matrix). This Matrix was prepared in accordance with the latest (PPG) guidance, and is considered to provide a proportionate evidence base to demonstrate the deliverability of Category C sites which are counted within the five year housing land supply. This approach was borne out by the Secretary of State’s response to the Council’s successful judicial review (March 2020).

- Development plan site allocations could be anticipated to deliver around 100 dwellings within five years.

4.3 These standards equated to anticipated delivery rates of 40-50 dwellings per year for sites of between 200 and 500 dwellings; i.e. below the strategic threshold as set out in the Joint Core Strategy. For sites of 500 dwellings or more (i.e. sustainable urban extensions), these could be expected to deliver higher numbers of dwellings annually due to two or more outlets coming forward simultaneously.

4.4 Accordingly, a simplified approach may be applied to defining deliverable supply, as set out below.

Table 2: Deliverability thresholds (2019-24)	
Typologies 1-2 – Category A sites below 500 dwellings; i.e. JCS threshold for ‘strategic sites’, Figure 12	Deliverable supply up to 200 dwellings within the 2019-24 monitoring period
Typologies 3-9 – Category B and C sites below 500 dwellings, with sufficient available evidence for deliverability, in accordance with the PPG	
Typologies 1, 3 and 5 – Category B sites (sustainable urban extensions; i.e. 500 dwellings or more)	Up to 500 dwellings may be included within deliverable supply, where outline planning permission and reserved matters granted/ pending for one or more specific phases

4.5 Beyond 2024, sites identified within the housing land supply are regarded as developable, but not deliverable. Typically, 40-50 dwellings per year could be anticipated to come forward over the remaining seven years of the Local Plan period (2024-2031). However, these rates would be expected to increase for larger sites (sustainable urban extensions – Rushden East and Irthlingborough West), which could be expected to continue delivery at higher annual rates (up to 150 per year) due to numbers of outlets.

5.0 Planning Practice Guidance – Housing supply and delivery (July 2019)

5.1 In response to the publication of the updated PPG (22 July 2019), an additional aspect was introduced to the process of assessing deliverability. The 2019 assessment of housing land supply (Planning Policy Committee, 17 December 2019, Item 8) included an additional matrix (Appendix 2), to assess deliverability of the following typologies of site:

- Typologies 3, 5 and 7 (Category B); and
- Typologies 8 and 9 (Category C).

5.2 Category A sites (typologies 1 and 2), together with minor Category B sites (typology 4; <10 dwellings) were presumed to be deliverable, unless it was specifically observed that such sites could not be delivered within the five year monitoring period; e.g. unequivocally unavailable now.

- 5.3 NPPF Annex 2 and the PPG set the current definition for deliverability. This places the onus upon the local planning authority to gather defensible evidence as to the deliverability of sites that do not have full planning permission at the monitoring date (1st April 2019). This requires the local planning authority to undertake a systematic assessment of development sites that do not, as yet, have full planning permission; but which the local authority wishes to count within its deliverable housing land supply.
- 5.4 Full details of the housing delivery matrix are set out in appendices 1 (section 5.0) and 2 of the Annual Position Statement (APS), December 2019. Appendix 2 of the APS provides an assessment of site typologies 3, 5, 7, 8 and 9 (Table 1, above). The process of engagement in the preparation of the Site Deliverability Matrix is set out in Appendix 1, section 5.0 of the APS.
- 5.5 The methodology was considered through the “Willows” appeal case (APP/G2815/W/19/3232099, 24 January 2020) and subsequent High Court judicial review (March 2020). The outcome of the judicial review was that the Secretary of State gave overall acceptance the Council’s definition for a ‘deliverable’ housing site, and therefore the overall methodology applied for the APR (approved 17 December 2019).
- 5.6 However, in the appeal decision the Inspector did not go further than a declaration that “Sites outside of the closed list” (Category C sites), as identified by Pegasus Planning, should be removed from the deliverable housing land supply. The Inspector did not engage with the extensive debate around the deliverability (or otherwise) of Category B sites. This was despite an extensive site by site debate taking place during the informal hearing on 8 January 2020.
- 5.7 Notwithstanding, consideration should be given to the additional evidence presented to the hearing, where the Council conceded a small number of deliverable sites from the APR, but also identified some further deliverable supply from developable sites with new deliverability evidence. In light of the range of evidence presented at the “Willows” appeal hearing, it is necessary to refresh the deliverable housing land supply.

6.0 Calculating the five year housing land supply for the District

- 6.1 The 2019 Housing Site Schedule (Planning Policy Committee, 17 December 2019; Item 8, Appendix 3) has been revisited in light of the evidence presented to and heard at the “Willows” hearing (8 January 2020). The deliverable supply put forward in the APS Housing Site Schedule have been amended as follows (**Appendix 2**):
- Removal of a small number of previously deliverable sites from the APR, equating to 72 dwellings;
 - Increased capacity (+30 dwellings) at an existing committed site; and
 - Addition of a new ‘Category (b)’ site (+100 dwellings), that was not regarded as deliverable in the 2019 Annual Position Statement, but which the latest evidence suggested was, in fact, deliverable.
- 6.2 This represents a net **58 dwellings** increase from the December 2019 Annual Position Statement, consisting of:
- Removal of five Category B and C sites from the deliverable supply, that it was accepted at the “Willows” hearing were unlikely to be deliverable by 2024;

- Additional capacity at one Category A site (+30 dwellings, Raunds); and
- Addition of one Category B site (+100 dwellings) to the deliverable supply from the developable (post-2024) housing land supply; and

6.3 Amendments to the 2019 Annual Position Statement are highlighted at Appendix 3. Table 3 (below) sets out the revised housing land supply calculations.

Table 3
Revised housing land supply calculation, 1
April 2019

Completions 2011-18	3,021
Recorded completions 2018-19	473
Total	3,494
Residual Requirement (2019-31)	4,906
Five year land supply requirement (2019-24)	2,100
Residual Requirement (2024-31)	2,806

JCS annual requirement (2011-31)	420
JCS Requirement 1 April 2011 - 31 March 2019 (Policy 28/ Table 4)	3,360
Shortfall (JCS requirement 2011-19 minus completions 2011-19)	-134
Shortfall yearly requirement	-19

Actual	
ENC Supply 2019-24	2,595
Windfall Allowance (41 dpa: 2020-23)	123
Total Supply 2019-24	2,718
ENC Requirement 2019-24	2,100
No. of Years Housing Supply	6.47

Required + 5% Buffer	
ENC Supply 2019-24	2,718
ENC Requirement 2019-24	2,205
No. of Years Housing Supply	6.16

6.4 This report explains the process for calculating the five year housing land requirement. The five year housing land supply has been calculated on the basis of the following assumptions:

- The adopted JCS (Local Plan Part 1; strategic policies) represents the basis for calculating the five year housing land supply (**420 dwellings per annum**: Policy 28/ Table 4), as required by the NPPF (paragraph 73).
- The total deliverable supply equates to **2,718 dwellings**; basic supply 2,595 dwellings, plus 123 dwellings windfall allowance.
- Assessment of delivery rates during the 2011-19 monitoring period has identified an overall excess of **134 dwellings** against the JCS requirement for the same period. This would entail a five year land supply requirement of **2,100 dwellings** (420 dwellings per year) for the 2019-24 monitoring period.

- Given that housing completions have progressively recovered throughout the plan period (since 2011) and now exceed the JCS requirement, it is concluded that a 5% buffer (contingency) should be applied in calculating the five year housing land supply (NPPF paragraph 73(a)). Therefore, the five year land supply requirement would equate to **2,205 dwellings** (including the 5% buffer).

6.5 During the 2018-19 monitoring year, 473 dwellings were completed, in excess of the JCS requirements (420 dwellings per year). The current five year land supply calculation as at 1 April 2019 assumes a deliverable housing land supply of 2418 dwellings, compared to a five year land supply requirement of 2,205 dwellings; i.e. the current five year supply as calculated provides **6.16 years** housing land supply ($2718/2205 \times 5$).

Appendix 3: Schedule of sites included in the five year housing land supply calculation (amended 8 January 2020)

Parish Name	Settle-ment type (Urban/Rural)	Address	Gross Area (ha)	Net No of dwellings committed as at 31 March 2019	Planning application reference	Current Status	PDL (Y/N)	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	5 year land supply totals (2019-24)	Total supply (2019-31)	Post-2031	
Aldwincle	Rural	10, Cross Lane	0.16	2	17/02560/FUL	STARTED	N	2												2	2		
Aldwincle	Rural	Lyveden Manor, Harley Way	10.67	-1	18/01818/FUL	GRANTED	Y		-1												-1	-1	
Ashton	Rural	The Mansion, Ashton Wold	0.84	7	11/01846/FUL	STARTED	Y	4	3												7	7	
Ashton	Rural	The Water Tower, Ashton Wold	0.88	1	13/00110/FUL	STARTED	Y		1												1	1	
Ashton	Rural	Walled Kitchen Garden, Ashton Wold	0.17	5	13/02127/VAR	STARTED	Y	2	3												5	5	
Benefield	Rural	Yokehill Farm, Weldon Road, Upper Benefield	0.58	1	13/00362/FUL	STARTED	Y	1													1	1	
Benefield	Rural	The Benefield Wheatsheaf, Main Street, Upper Benefield	0.38	8	14/01751/FUL	GRANTED	Y		4	4											8	8	
Benefield	Rural	Buildings And Land Adjacent And Rear Of 15, Main Street, Upper Benefield	0.27	6	14/02085/FUL	STARTED	Y	3	3												6	6	
Benefield	Rural	Ashley Farm, Main Street, Upper Benefield	0.12	1	15/00274/FUL	STARTED	Y	1													1	1	
Benefield	Rural	Yokehill Farm, Weldon Road, Upper Benefield	0.43	1	15/00729/PDU	STARTED	Y	1													1	1	
Benefield	Rural	Coach House, Berkeley House, Main Street, Lower Benefield	0.12	1	17/00831/FUL	STARTED	Y	1													1	1	
Benefield	Rural	33, Main Street, Lower Benefield	0.07	1	18/01647/FUL	STARTED	Y	1													1	1	
Brigstock	Rural	Property between No 4 and Stable Barn, Stable Hill	0.04	1	16/00125/FUL	STARTED	Y	1													1	1	
Brigstock	Rural	1, Hunter Rise	0.20	1	17/02567/FUL	STARTED	Y	1													1	1	
Brigstock	Rural	Land Adjacent 4, Stanion Road	0.09	2	18/00876/OUT	GRANTED	N			2											2	2	
Chelveston-cum-Caldecott	Rural	White House, The Green, Chelveston	0.04	1	18/00591/FUL	STARTED	Y	1													1	1	
Chelveston-cum-Caldecott	Rural	Land Adjacent, 47 The Crescent, Chelston Rise	0.70	9	18/00708/FUL	GRANTED	N		4	5											9	9	
Chelveston-cum-Caldecott	Rural	Site 949, Former Quarry, Bidwell Lane, Caldecott	0.41	5	18/01359/FUL	STARTED	Y	5													5	5	
Clopton	Rural	Motel Block, The Red Lion Inn, Main Street	0.29	3	16/02182/REM	GRANTED	Y		3												3	3	
Clopton	Rural	16, Main Street, Clopton, NN14 3DZ	0.06	1	16/02214/FUL	GRANTED	N		1												1	1	
Collyweston	Rural	Site 1172, Former Quarry, Main Road	0.18	1	15/01726/FUL	STARTED	Y	1													1	1	
Deenethorpe	Rural	14 Deenethorpe Lane, Manor Farm	0.60	1	18/00626/FUL	GRANTED	Y		1												1	1	
Denford	Rural	Land Rear Of Glebe House, Meadow Lane	0.04	1	13/00670/FUL	STARTED	Y	1													1	1	
Duddington-with-Fineshade	Rural	Monkton Sidings, Stamford Road, Fineshade	0.75	1	17/01387/FUL	GRANTED	Y		1												1	1	
Duddington-with-Fineshade	Rural	Barns North Of Home Farm, High Street, Duddington	0.13	2	17/02089/FUL	GRANTED	Y		2												2	2	
Duddington-with-Fineshade	Rural	Fineshade Farm, Stamford Road, Fineshade	0.47	2	17/02402/FUL	STARTED	Y	2													2	2	

Appendix 3: Schedule of sites included in the five year housing land supply calculation (amended 8 January 2020)

Parish Name	Settle-ment type (Urban/Rural)	Address	Gross Area (ha)	Net No of dwellings committed as at 31 March 2019	Planning application reference	Current Status	PDL (Y/N)	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	5 year land supply totals (2019-24)	Total supply (2019-31)	Post-2031
Duddington-with-Fineshade	Rural	Manor Farm, High Street, Duddington	0.10	1	18/00804/FUL	STARTED	Y	1												1	1	
Duddington-with-Fineshade	Rural	Barns North Of Home Farm, High Street, Duddington	0.07	1	18/01207/FUL	STARTED	Y	1												1	1	
Duddington-with-Fineshade	Rural	Gardeners Cottage, High Street, Duddington	0.01	1	18/02207/FUL	GRANTED	Y		1											1	1	
Easton on the Hill	Rural	Land Rear Of 28 30 And 32, Western Avenue	0.37	9	16/01833/FUL	STARTED	N	4	5											9	9	
Easton on the Hill	Rural	25, High Street	0.36	1	17/00072/FUL	STARTED	Y	1												1	1	
Easton on the Hill	Rural	37, West Street	0.20	1	17/01942/FUL	STARTED	Y	1												1	1	
Easton on the Hill	Rural	Land Rear Of 28 30 And 32, Western Avenue	0.08	1	18/01844/FUL	STARTED	Y	1												1	1	
Glaphthorn	Rural	Manor Farm, Cotterstock Road	0.44	4	18/00895/FUL	GRANTED	Y		4											4	4	
Glaphthorn	Rural	Leverton, Oundle Road	0.11	1	18/02297/FUL	GRANTED	Y		1											1	1	
Glaphthorn	Rural	Land Adjacent The Cottage, Benefield Road		2	18/01496/FUL	GRANTED	N			2										2	2	
Great Addington	Rural	Patch Lodge, Cranford Road	2.06	1	16/00041/FUL	GRANTED	Y		1											1	1	
Great Addington	Rural	Rectory Farm, Cranford Road	0.31	2	16/02466/FUL	GRANTED	Y			2										2	2	
Great Addington	Rural	Patch Lodge Farm Caravan, Cranford Road	0.10	1	17/02380/FUL	GRANTED	Y		1											1	1	
Hargrave	Rural	1, Nags Head Lane	0.06	1	12/00481/REM	STARTED	N	1												1	1	
Hargrave	Rural	Land between The Gables and Church Road	0.15	1	15/00472/OUT	GRANTED	Y			1										1	1	
Hargrave	Rural	Land Adjacent Rectory View, Church Road	0.26	2	18/01293/FUL	STARTED	Y	2												2	2	
Hargrave	Rural	4, Moor Cottages, Nags Head Lane	0.06	1	18/02258/FUL	STARTED	Y	1												1	1	
Harringworth	Rural	Barns to SE of Lime Grange, Wakerley Road	0.11	1	16/00131/FUL	STARTED	Y	1												1	1	
Harringworth	Rural	Glebe Barns, Wakerley Road	0.75	1	18/00255/FUL	STARTED	Y	1												1	1	
Higham Ferrers	Urban	82, High Street	0.03	2	17/02221/FUL	STARTED	Y	2												2	2	
Higham Ferrers	Urban	Land Rear of 10, Windmill Banks	0.03	2	18/01322/FUL	GRANTED	Y		2											2	2	
Irthlingborough	Urban	2, Victoria Street	0.01	1	11/01083/VAR	STARTED	Y	1												1	1	
Irthlingborough	Urban	4, Baker Street	0.04	1	12/01497/FUL	STARTED	N	1												1	1	
Irthlingborough	Urban	271, Addington Road	0.45	1	15/00370/FUL	GRANTED	N		1											1	1	
Irthlingborough	Urban	13-19, High Street	0.05	5	15/00722/VAR	GRANTED	Y		2	3										5	5	
Irthlingborough	Urban	19-21, High Street	0.21	2	15/01953/FUL	GRANTED	Y		2											2	2	
Irthlingborough	Urban	Nene Business Park, Diamond Way	9.13	88	16/01431/OUT & 19/00402/REM	GRANTED	Y			8	40	40								88	88	
Irthlingborough	Urban	Rear Of Green Close, Wellingborough Road	3.49	60	16/01944/REM	GRANTED	N			30	30									60	60	
Irthlingborough	Urban	176, High Street	0.09	3	16/02311/OUT	GRANTED	N			3										3	3	
Irthlingborough	Urban	Land Adjacent to 11 Manor Drive	0.01	1	17/00836/FUL	STARTED	N	1												1	1	
Irthlingborough	Urban	Land Adjacent 83, Victoria Street	0.02	1	17/02483/FUL	GRANTED	Y		1											1	1	
Irthlingborough	Urban	49, Finedon Road	0.14	3	18/00609/FUL	STARTED	Y	3												3	3	
Irthlingborough	Urban	2A, New Street	0.04	3	18/00722/OUT	GRANTED	Y			3										3	3	
Irthlingborough	Urban	126, Victoria Street	0.03	2	18/02239/FUL	GRANTED	Y		2											2	2	

Appendix 3: Schedule of sites included in the five year housing land supply calculation (amended 8 January 2020)

Parish Name	Settle-ment type (Urban/Rural)	Address	Gross Area (ha)	Net No of dwellings committed as at 31 March 2019	Planning application reference	Current Status	PDL (Y/N)	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	5 year land supply totals (2019-24)	Total supply (2019-31)	Post-2031
Islip	Rural	The Mill Barn, Mill Lane	0.21	1	16/01835/FUL	GRANTED	Y		1											1	1	
King's Cliffe	Rural	Huskissons Lodge Farm Buildings, Wansford Road	0.82	4	15/01767/FUL	STARTED	Y	4												4	4	
King's Cliffe	Rural	94, West Street	0.02	1	16/01525/FUL	GRANTED	N		1											1	1	
King's Cliffe	Rural	33, Wood Road	0.18	2	18/01971/FUL	GRANTED	Y			2										2	2	
Lilford-cum-Wigsthorpe	Rural	Wigsthorpe House Farm, Main Street, Wigsthorpe	0.25	3	17/01325/FUL	GRANTED	N			3										3	3	
Little Addington	Rural	Land Adjacent Meadowview, Woodford Road	0.46	11	16/02305/FUL	GRANTED	N		11											11	11	
Little Addington	Rural	The Bell Inn, High Street	0.08	1	17/02080/REM	GRANTED	Y		1											1	1	
Lutton	Rural	Piccadilly Farm, Main Street	0.50	1	18/02320/OUT	GRANTED	Y			1										1	1	
Newton Bromswold	Rural	Manor Farm, Rushden Road	0.01	1	18/01233/FUL	GRANTED	Y		1											1	1	
Oundle	Urban	38, West Street	0.20	4	16/00069/OUT	GRANTED	Y			4										4	4	
Oundle	Urban	88 West Street	0.01	1	17/02453/FUL	GRANTED	Y		1											1	1	
Oundle	Urban	24B, East Road	0.17	2	18/00351/FUL	STARTED	Y	2												2	2	
Raunds	Urban	Darsdale Farm ("Darcie Park"), Chelveston Road	17.36	382	13/01604/REM & 18/00656/VAR	STARTED	N	60	60	45	45	23								233	233	
Raunds	Urban	Brook Farm Cottage, Brooks Road	0.11	1	14/00528/FUL	STARTED	Y	1												1	1	
Raunds	Urban	Land North Of Raunds Fronting, Brick Kiln Road, North Street, Brooks Road And Midland Road	16.88	310	14/01082/REM	STARTED	N	36	40	40	40	40	20							196	216	
Raunds	Urban	Land Adjacent 2, Midland Road	0.03	1	15/02157/FUL	GRANTED	N		1											1	1	
Raunds	Urban	22, Rotton Row	0.16	2	16/00869/REM	STARTED	N	2												2	2	
Raunds	Urban	Sub Station Site, Midland Road	0.04	2	16/00903/FUL	STARTED	Y	2												2	2	
Raunds	Urban	St John Ambulance Hall, High Street	0.07	1	17/00906/FUL	STARTED	Y	1												1	1	
Raunds	Urban	Antona, Stanwick Road	0.33	3	17/02442/OUT	GRANTED	Y			3										3	3	
Raunds	Urban	Crossways, 1 Chelveston Road	0.42	2	18/00877/FUL	STARTED	Y	2												2	2	
Raunds	Urban	46, Cartrill Street	0.30	5	18/01510/OUT	GRANTED	Y			2	3									5	5	
Ringstead	Rural	Spencer Street	0.04	1	17/00424/FUL	GRANTED	Y		1											1	1	
Ringstead	Rural	Tithe Farm 5, Ham Lane	0.02	1	18/00549/VAR	GRANTED	N		1											1	1	
Rushden	Urban	Engineering Premises, Shirley Road	0.11	14	03/01551/FUL	STARTED	Y	7	7											14	14	
Rushden	Urban	127, Queen Street	0.04	2	13/00315/FUL	STARTED	Y	2												2	2	
Rushden	Urban	113, High Street South	0.01	4	16/00548/OUT	GRANTED	Y			4										4	4	
Rushden	Urban	Mike Wells Cars, Montague Street	0.18	12	16/01343/OUT	GRANTED	Y			6	6									12	12	
Rushden	Urban	7, Birchall Road	0.03	1	16/01348/FUL	GRANTED	Y		1											1	1	
Rushden	Urban	20, Kings Road	0.14	4	16/01843/FUL	GRANTED	N		4											4	4	
Rushden	Urban	Site At 206 208 And 208A, Wellingborough Road	0.10	7	16/02358/FUL	GRANTED	Y		3	4										7	7	
Rushden	Urban	67, Wellingborough Road	0.03	1	16/02449/PDU	GRANTED	Y		1											1	1	
Rushden	Urban	8A, Church Street	0.01	2	17/02311/FUL	GRANTED	Y		2											2	2	
Rushden	Urban	123, Northampton Road	0.13	1	18/00284/OUT	GRANTED	Y			1										1	1	
Rushden	Urban	2, Prospect Avenue	0.09	1	18/00955/FUL	STARTED	Y	1												1	1	
Rushden	Urban	48, High Street South	0.05	4	18/01010/FUL	GRANTED	Y		2	2										4	4	
Rushden	Urban	55, Rushmere Way	0.03	1	18/01136/REM	STARTED	N	1												1	1	

Appendix 3: Schedule of sites included in the five year housing land supply calculation (amended 8 January 2020)

Parish Name	Settle-ment type (Urban/Rural)	Address	Gross Area (ha)	Net No of dwellings committed as at 31 March 2019	Planning application reference	Current Status	PDL (Y/N)	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	5 year land supply totals (2019-24)	Total supply (2019-31)	Post-2031
Rushden	Urban	55, North Street	0.06	1	18/01392/FUL	STARTED	Y	1												1	1	
Rushden	Urban	Manor Lodge Farm, 411, Newton Road	0.23	2	18/01623/FUL	GRANTED	Y		2											2	2	
Rushden	Urban	84, Avenue Road	0.21	1	18/01851/FUL	GRANTED	Y		1											1	1	
Rushden	Urban	158, Wymington Road	0.15	2	18/01972/FUL	STARTED	Y	2												2	2	
Rushden	Urban	31, Fitzwilliam Street	0.01	1	18/02227/FUL	GRANTED	Y		1											1	1	
Rushden	Urban	182, Wellingborough Road	0.02	1	18/02400/FUL	GRANTED	Y			1										1	1	
Rushden	Urban	30, Blinco Road	0.03	1	19/00058/FUL	GRANTED	Y		1											1	1	
Southwick	Rural	Velaire House, Bulwick Road	0.05	1	15/02116/PDU	STARTED	Y	1												1	1	
Stanwick	Rural	2, St Laurence Way	0.04	1	17/01294/FUL	STARTED	Y	1												1	1	
Stanwick	Rural	Land Adjacent 51, West Street	0.08	1	17/01712/REM	STARTED	N	1												1	1	
Sudborough	Rural	Riding Stables Manor Yard, Main Street	0.57	3	10/01376/FUL	STARTED	Y	3												3	3	
Sudborough	Rural	Indoor Riding School Manor Yard, Main Street	0.22	1	16/02190/FUL	STARTED	N	1												1	1	
Tansor	Rural	Tansor Wold Farm Buildings, Tansor Wold Road	0.77	2	14/02243/VAR	STARTED	Y	2												2	2	
Thrapston	Urban	Springfield Farm, Oundle Road	0.38	5	12/01800/FUL	STARTED	N	1	4											5	5	
Thrapston	Urban	Land Between Oakleas Rise And A14, Midland Road	2.30	65	18/01186/REM	GRANTED	N		30	35										65	65	
Thrapston	Urban	50, High Street	0.07	2	16/00369/FUL	STARTED	Y	2												2	2	
Thrapston	Urban	Land Between 15 And 15A, Chancery Lane	0.16	2	16/01033/FUL	GRANTED	N		2											2	2	
Thrapston	Urban	7, Chancery Lane	0.07	1	16/01421/FUL	STARTED	Y	1												1	1	
Thrapston	Urban	Land Off, Huntingdon And Market Road	16.60	418	16/01690/REM	STARTED	N	23	44	45	45	45	45	45	50	50				202	392	
Thrapston	Urban	Mill Marina, Midland Road	0.49	8	17/00486/FUL	GRANTED	Y			8										8	8	
Thrapston	Urban	38, Huntingdon Road	0.22	6	18/00526/FUL	GRANTED	Y		6											6	6	
Thrapston	Urban	68, Market Road	0.02	1	18/01900/FUL	GRANTED	Y		1											1	1	
Thrapston	Urban	The Kings Arms, High Street	0.13	7	97/00773/FUL	STARTED	Y					4								4	4	
Thurning	Rural	Thurning Lodge, Winwick Road	0.36	1	10/00948/RWL	STARTED	Y	1												1	1	
Thurning	Rural	The Old Rectory, Winwick Road	0.53	1	17/00797/VAR	GRANTED	Y		1											1	1	
Thurning	Rural	Hill Farm Buildings, Barnwell Road	0.09	1	18/02075/FUL	STARTED	Y	1												1	1	
Thurning	Rural	Hill Farm Buildings, Barnwell Road	0.24	1	18/02076/FUL	STARTED	Y	1												1	1	
Titchmarsh	Rural	Village Farm, North Street	0.40	5	17/00692/FUL	GRANTED	Y		2	3										5	5	
Twywell	Rural	Agricultural Building, High Street, Twywell	0.12	1	17/00565/FUL	STARTED	N	1												1	1	
Wadenhoe	Rural	Wadenhoe House, Church Street	0.28	2	17/01397/FUL	STARTED	Y	2												2	2	
Wadenhoe	Rural	Dovecote, Pilton Road	0.20	1	18/02318/FUL	STARTED	Y	1												1	1	
Warmington	Rural	Little Orchard, Peterborough Road	0.05	1	13/00004/FUL	STARTED	N	1												1	1	
Warmington	Rural	18 - 20, Chapel Street	0.31	11	16/00326/FUL	GRANTED	Y		5	6										11	11	
Warmington	Rural	Davys Lodge, Morborne Road	0.63	1	17/00870/FUL	STARTED	Y	1												1	1	

Appendix 3: Schedule of sites included in the five year housing land supply calculation (amended 8 January 2020)

Parish Name	Settle-ment type (Urban/Rural)	Address	Gross Area (ha)	Net No of dwellings committed as at 31 March 2019	Planning application reference	Current Status	PDL (Y/N)	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	5 year land supply totals (2019-24)	Total supply (2019-31)	Post-2031
Warmington	Rural	21, Broadgate Way	0.06	1	18/01707/REM	GRANTED	Y		1											1	1	
Woodford	Rural	11, Church Street	0.05	1	08/02290/REM	STARTED	Y	1												1	1	
Woodford	Rural	Garages Adjacent 12, The Leys	0.10	6	15/00811/FUL	GRANTED	Y		3	3										6	6	
Woodford	Rural	10, Addington Road	0.05	1	15/01477/FUL	STARTED	Y	1												1	1	
Woodford	Rural	7, High Street	0.16	1	17/01026/REM	GRANTED	Y		1											1	1	
Woodford	Rural	Manor House Farm Buildings, Addington Road	0.04	1	16/01518/FUL	GRANTED	N		1											1	1	
Yarwell	Rural	Whitelands Farm, Sulehay Road	0.04	1	18/02313/FUL	STARTED	N	1												1	1	
Brigstock	Rural	Land North of Stanion Road	1.90	25	B3 (Brigstock NP)	Adopted DPD Allocation	N				10	15								25	25	
Brigstock	Rural	Land Between Allotments And Number 27, Grafton Road	0.31	10	B1 (Brigstock NP)	Adopted DPD Allocation	N			10										10	10	
Chelveston-cum-Caldecott	Rural	The Barns, Caldecott		2	H4c & H4d	Adopted DPD Allocation	N				2									2	2	
Chelveston-cum-Caldecott	Rural	Raunds Road/Sawyers Crescent, Chelveston		8	H4e	Adopted DPD Allocation	N						4	4						0	8	
Chelveston-cum-Caldecott	Rural	J S T Forklifts Ltd, Higham Road, Chelveston	0.27	9	H4f	Adopted DPD Allocation	Y						5	4						0	9	
Deene	Rural	The Sea Horse	0.28	5	19/01556/FUL (pending)	Specific, unallocated BF site	Y			6										6	6	
Glaphorn	Rural	Land below Glaphorn Manor Farm, bordering Benefield Road between Manor Farm and Crown House	0.40	5	B.3	Adopted DPD Allocation	N					5								5	5	
Glaphorn	Rural	Land at Church Farm	0.14	3	B.5	Adopted DPD Allocation	N				3									3	3	
Glaphorn	Rural	Meadow View	0.33	1	B.6	Adopted DPD Allocation	Y			1										1	1	
Glaphorn	Rural	Between Rose Cottage and Northfield	0.03	1	B11	Adopted DPD Allocation				1										1	1	
Glaphorn	Rural	Land to the west of Southwick Road	0.37	3	B15	Adopted DPD Allocation					3									3	3	
Higham Ferrers	Urban	Higham Town Band Club, 7 Wharf Road	0.08	10	19/01625/QRY	Specific, unallocated BF site	Y				10									10	10	
Higham Ferrers	Urban	Former Textile Bonding Factory/ Federal Estate Industrial Park, Newton Road	5.30	120	EN37	Emergent DPD allocation	Y				40	40	40							80	120	
Higham Ferrers	Urban	Ferrers School	11.82	300	18/01648/OUT (pending)	Adopted DPD Allocation	N			40	55	55	55	55	40					150	300	
Irthlingborough	Urban	Rear Of Green Close, Wellingborough Road	3.49	24	19/01425/FUL (pending)	Emergent DPD allocation	N			24										24	24	
Irthlingborough	Urban	Express Hall, 102 Nene View	0.22	8	19/01682/QRY	Specific, unallocated BF site	Y			8										8	8	

Appendix 3: Schedule of sites included in the five year housing land supply calculation (amended 8 January 2020)

Parish Name	Settle-ment type (Urban/Rural)	Address	Gross Area (ha)	Net No of dwellings committed as at 31 March 2019	Planning application reference	Current Status	PDL (Y/N)	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	5 year land supply totals (2019-24)	Total supply (2019-31)	Post-2031
Irthlingborough	Urban	West of Huxlow School/ Irthlingborough West SUE	52.40	700	10/00857/OUT (pending)	Emergent DPD allocation	N								50	50	50	50	50	0	250	450
Irthlingborough	Urban	Whitworths, Wellingborough Road	2.40	70	18/00520/QRY	Specific, unallocated BF site	Y						30	40						0	70	
Irthlingborough	Urban	Land Rear Of Nicholas Road	4.33	105	18/00945/OUT (pending)	Emergent DPD allocation	N			30	40	35								105	105	
Irthlingborough	Urban	Land east of Addington Road	3.08	79	18/01009/OUT (refused)	Adopted DPD Allocation	N					49	30							49	79	
King's Cliffe	Rural	Land at end of Millwood Way	0.23	10	19/01591/QRY	Emergent DPD allocation	N			10										10	10	
King's Cliffe	Rural	Old Middle School Site, King's Forest	2.00	25	SA1	Emergent DPD allocation	Y				10	15								25	25	
King's Cliffe	Rural	King's Cliffe Endowed Primary School, Park Street	0.27	0	n/a	DELETED FROM HOUSING LAND SUPPLY	Y													0	0	
Nassington	Rural	Church Street	0.30	11	NAS1	Adopted DPD Allocation											11			0	11	
Nassington	Rural	Land off Fenn Close	0.38	12	18/02171/FUL (pending)	Emergent DPD allocation				12										12	12	
Oundle	Urban	Ashton Road/ Herne Road (Phase 2)	4.86	50	OUN3(1) & 18/00874/QRY	Adopted DPD Allocation						7	25	18						7	50	
Oundle	Urban	Dairy Farm	0.51	20	OUN3(3)	Adopted DPD Allocation						14	6							14	20	
Oundle	Urban	Land Between St Christophers Drive And A605 Oundle Bypass	3.90	100	19/01355/OUT (pending)	Emergent DPD allocation	N				50	50								100	100	
Oundle	Urban	OP0038 TL0389 Cotterstock Road	5.10	130	19/01327/OUT (pending)	Emergent DPD allocation	N				50	50	30							100	130	
Oundle	Urban	Land To Rear Of Cemetery, Stoke Doyle Road	4.00	70	19/00783/QRY	Emergent DPD allocation	N				30	33	7							63	70	
Oundle	Urban	Former Abbott House Residential Home, Glapthorn Road	0.34	5	19/01325/QRY	Specific, unallocated BF site	Y				5									5	5	
Oundle	Urban	Miller's Field, Benefield Road	0.55	15		Emergent DPD allocation	N			15										15	15	
Raunds	Urban	Kingswood House, Hollington Road	0.28	10	19/00709/FUL (pending)	Specific, unallocated BF site	Y			10										10	10	
Raunds	Urban	Land Rear Of 14 - 34 Marshalls Road	0.46	12	19/00656/QRY	Specific, unallocated BF site	Y			6	6									12	12	
Raunds	Urban	Gells, 35 High Street	0.23	0	n/a	DELETED FROM HOUSING LAND SUPPLY	Y													0	0	
Raunds	Urban	Land to the north east side of Midland Road	0.60	11	18/01109/FUL (pending)	Specific, unallocated BF site	Y		5	6										11	11	
Raunds	Urban	Land North Of Raunds Fronting, Brick Kiln Road, North Street, Brooks Road And Midland Road	16.88	30	14/01082/REM & 19/01963/QRY	ADDITIONAL CAPACITY - COMMITTED SITE	N					30								30	30	

Appendix 3: Schedule of sites included in the five year housing land supply calculation (amended 8 January 2020)

Parish Name	Settle-ment type (Urban/Rural)	Address	Gross Area (ha)	Net No of dwellings committed as at 31 March 2019	Planning application reference	Current Status	PDL (Y/N)	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	5 year land supply totals (2019-24)	Total supply (2019-31)	Post-2031
Ringstead	Rural	Dodson and Horrell, 2 Spencer Street	1.64	36	18/01365/QRY	Specific, unallocated BF site	Y				18	18								36	36	
Rushden	Urban	Rushden East Urban Extension, Liberty Way	220.00	2500	19/00845/QRY	Adopted DPD Allocation	N				75	100	125	150	150	150	150	150	150	175	1200	1300
Rushden	Urban	105 High Street	0.16	8	19/01569/FUL (pending)	Specific, unallocated BF site	Y			8										8	8	
Rushden	Urban	Home Suite Home, Higham Road	0.23	16	19/00586/FUL (withdrawn)	Specific, unallocated BF site	Y				6	10								16	16	
Rushden	Urban	Rushden Memorial Clinic Hayway	0.40	14	19/00594/FUL (refused)	Specific, unallocated BF site	Y		7	7										14	14	
Rushden	Urban	Hamblin House, Hamblin Court	0.03	7	19/01437/FUL (pending)	Specific, unallocated BF site	Y			7										7	7	
Rushden	Urban	Vacant Land Formerly 10 Higham Road	0.18	8	19/01055/OUT (withdrawn)	Specific, unallocated BF site	Y				8									8	8	
Rushden	Urban	Avenue Agricultural, Park Road	0.15	8	19/01269/QRY	Specific, unallocated BF site	Y				8									8	8	
Rushden	Urban	1 High Street South	0.11	9	19/01398/QRY	Specific, unallocated BF site	Y			5	4									9	9	
Rushden	Urban	D B Shoes, 21-29 Irchester Road	0.23	15	H2A	Adopted DPD Allocation	Y						5	10						0	15	
Rushden	Urban	Sports Ground, Hayden Road	2.74	100	H2B	Adopted DPD Allocation	N							30	40	30				0	100	
Rushden	Urban	Land off Shirley Road	3.68	150	H2C	Adopted DPD Allocation	Mixed								40	40	40	30		0	150	
Rushden	Urban	Manor Park, Bedford Road	11.14	150	19/01974/FUL & 19/01975/OUT	Adopted DPD Allocation - AMENDED TRAJECTORY	N				50	50	50							100	150	
Rushden	Urban	Land East of Brindley Close, Northampton Road	2.86	80	18/01388/FUL (appeal)	Adopted DPD Allocation	N		30	30	20									80	80	
Rushden	Urban	Land at Northampton Road Corner/ Brambleside, Hayway	4.50	65	17/01064/QRY	Adopted DPD Allocation	N			35	30									65	65	
Rushden	Urban	Former Factory, Corner of Oakley Road	0.29	15	09/00405/REM (refused)	Specific, unallocated BF site	Y		15											15	15	
Rushden	Urban	Rectory Business Centre	1.10	35		Specific, unallocated BF site	Y							20	15					0	35	
Thrapston	Urban	Land south of Grassendale/ rear of Former Factory Premises, Grove Road	0.24	0	n/a	DELETED FROM HOUSING LAND SUPPLY	N													0	0	

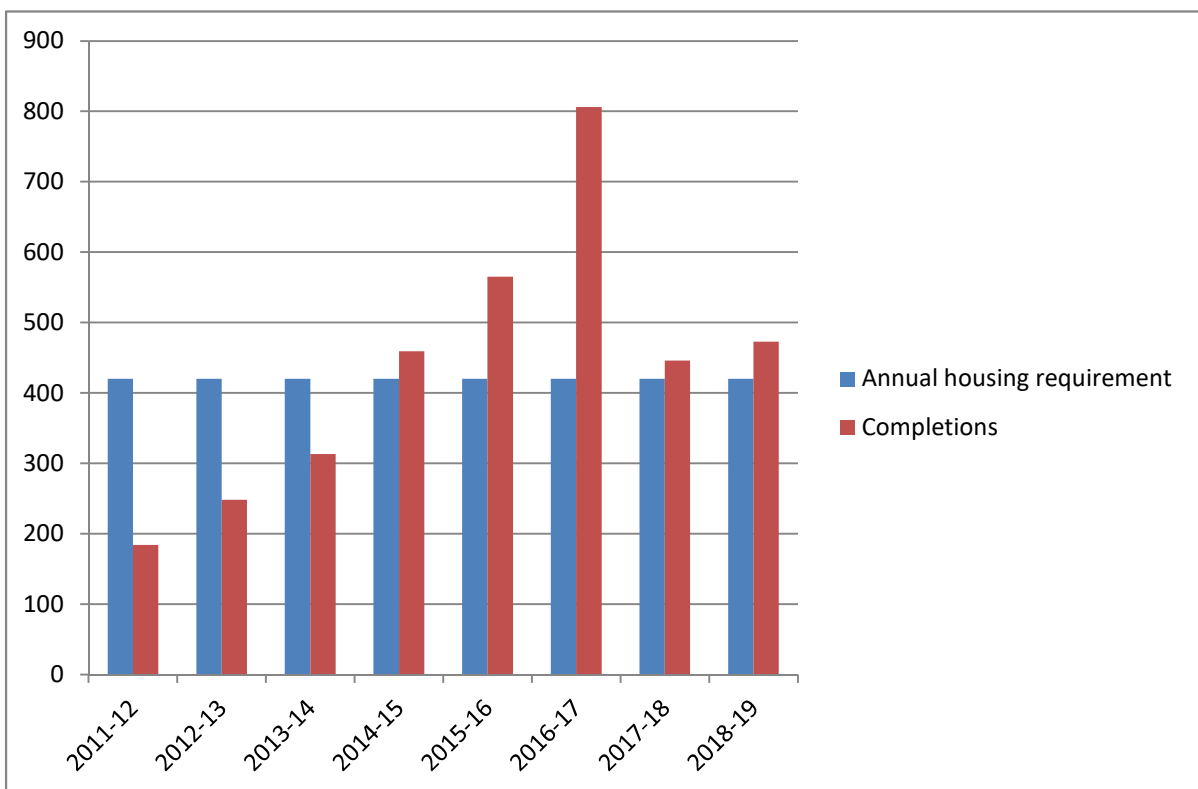
Appendix 3: Schedule of sites included in the five year housing land supply calculation (amended 8 January 2020)

Parish Name	Settle- ment type (Urban/ Rural)	Address	Gross Area (ha)	Net No of dwellings committed as at 31 March 2019	Planning application reference	Current Status	PDL (Y/N)	2019- 20	2020- 21	2021- 22	2022- 23	2023- 24	2024- 25	2025- 26	2026- 27	2027- 28	2028- 29	2029- 30	2030- 31	5 year land supply totals (2019- 24)	Total supply (2019-31)	Post-2031
Thrapston	Urban	Coal Yard And 20 Midland Road	0.76	0	n/a	DELETED FROM HOUSING LAND SUPPLY	Y													0	0	
Thrapston	Urban	Rockleigh, 3 Winding Way	0.10	0	n/a	DELETED FROM HOUSING LAND SUPPLY	Mixed													0	0	
Warmington	Rural	Eaglethorpe Barns	0.87	12	WAR1	Adopted DPD Allocation	N								12					0	12	
																				2595	4846	
Windfall allowance										41	41	41	41	41	41	41	41	41	41	123	410	
								223	350	609	767	769	518	417	438	361	292	271	241	2718	5256	

**Appendix 4: Housing delivery 2011-2019,
compared to Joint Core Strategy (2011-2031) housing requirement**

	Annual housing requirement	Completions	Notes
2011-12	420	184	Start date for JCS (1 April 2011 - 31 March 2031)
2012-13	420	248	
2013-14	420	313	
2014-15	420	459	
2015-16	420	565	
2016-17	420	806	
2017-18	420	446	
2018-19	420	473	Recorded completions 2018-19
TOTAL	3,360	3,494	

SHORT-FALL	-134	[Annual housing requirement minus completions]
-------------------	-------------	---



Appendix 5: Five year housing land supply calculations 2019-24 (amended 8 January 2020)

Year	JCS Annual Requirement	Revised JCS Requirement (applying the Sedgefield approach, 2019-24)	Revised Annual Requirement	Five Year Requirement 2019-24
2019-20	420	420	420	2,100
2020-21	420	420	420	
2021-22	420	420	420	
2022-23	420	420	420	
2023-24	420	420	420	
2024-25	420	401	401	
2025-26	420	401	401	
2026-27	420	401	401	
2027-28	420	401	401	
2028-29	420	401	401	
2029-30	420	401	401	
2030-31	420	401	401	
Total	5,040	4,906	4,906	

Completions 2011-18	3,021
Recorded completions 2018-19	473
Total	3,494
Residual Requirement (2019-31)	4,906
Residual Requirement (2024-31)	2,806

JCS Requirement 1 April 2011 - 31 March 2019 (Policy 28/ Table 4)	3,360
Shortfall (JCS requirement 2011-19 minus completions 2011-19)	-134
Shortfall yearly requirement	-19

Actual	
ENC Supply 2019-24	2,595
Windfall Allowance (41 dpa: 2020-23)	123
Total Supply 2019-24	2,718
ENC Requirement 2019-24	2,100
No. of Years Housing Supply	6.47

Required + 5% Buffer	
ENC Supply 2019-24	2,718
ENC Requirement 2019-24	2,205
No. of Years Housing Supply	6.16