



## Appeal Decision

Inquiry Held on 10-13 and 18 October 2017

Site visits made on 9 and 13 October 2017

**by John Felgate BA(Hons) MA MRTPI**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Decision date: 11 December 2017**

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**Appeal Ref: APP/H0520/W/17/3172571**

**Land adjacent to Nos 66-100, Thrapston Road, Brampton**

- 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 Abbey Properties Cambridgeshire Ltd, Patricia Findlay, Peter Marden-Findlay, Nicola Findlay and Georgina Blanter, against the decision of Huntingdonshire District Council.
  - The application Ref 16/01255/OUT, dated 13 June 2016, was refused by notice dated 27 January 2017.
  - The development proposed is residential development, involving the erection of 63 dwellings, access arrangements and associated works.
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### Decision

1. The appeal is dismissed.

### Preliminary Matters

2. On the application form, the site address is missing. For the avoidance of doubt, the site comprises land adjacent to No 66 Thrapston Road, and to the rear of Nos 66-100.
3. The appeal seeks outline permission with all details reserved except for access. The proposed access arrangement is shown on revised Drawing JNY8798-01, which was before the Council when it made its decision on the application. In so far as the submitted plans also include other details, it is agreed that these are illustrative.
4. The Council's decision to refuse permission cited four refusal reasons. Reason No 2, relating to archaeology, and No 3 relating to odour, were withdrawn prior to the inquiry, in response to further evidence. In the case of archaeology, the withdrawal was contingent on the imposition of a relevant planning condition.
5. Refusal reason No 4 was based on the lack of provision for affordable housing, on-site greenspace, wheeled refuse bins, and the translocation of Great Crested Newts. Subsequently, a Section 106 legal agreement has been entered into by the appellants, with the District Council and Cambridgeshire County Council (CCC), which deals with these matters. At the inquiry, it was confirmed that this agreement overcomes refusal reason No 4 to both Councils' satisfaction. In the light of the evidence, I am also satisfied that the terms of the agreement accord with the relevant legal and policy tests for planning obligations<sup>1</sup>.

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<sup>1</sup> Regs 122 and 123 of the Community Infrastructure Levy Regulations 2010; and NPPF paragraph 204

## Relevant Planning Policies

### *Development Plan policies*

6. The Huntingdonshire Local Plan (the HLP), adopted in December 1995, defines village boundaries, also known as environmental limits. The appeal site lies outside the boundary thus defined around Brampton. In such areas, HLP Policy H23 states that there will be a general presumption against housing development, except where required for agriculture or similar purposes. HLP Policy En17 contains a similar restriction on all development outside environmental limits. The reasons for these policies include protecting the landscape and rural amenity, and avoiding visual intrusion in the countryside<sup>2</sup>.
7. In the Huntingdonshire Core Strategy (the HCS), adopted in September 2009, Policy CS1 sets out criteria by which proposals will be judged for the purposes of assessing whether they contribute to the pursuit of sustainable development. These include preserving and enhancing the diversity and distinctiveness of the District's towns, villages and landscapes.
8. Policy CS3 of the same plan sets out a settlement hierarchy. Brampton is listed as a key service centre, where schemes of up to moderate scale may be appropriate, within the built-up area. Moderate is defined indicatively as 10-59 dwellings, although larger schemes may be allowed where this would secure the most sustainable option for the site. Paragraph 5.15 states that built-up areas will be defined in a future DPD, but in the meantime they are assumed to be the settlement's existing built form. It is not disputed that the appeal site lies outside that area.
9. In the Huntingdon West Area Action Plan (the HWAAP), adopted in February 2011, Policy HW6 identifies land immediately to the north of the appeal site as a potential extension to the Hinchingbrooke Country Park.

### *Emerging policies*

10. The emerging 'Draft Huntingdonshire Local Plan to 2036' (the DHLP), has passed through several stages, the most recent being the 'Consultation Draft 2017', published in June 2017, which is referred to unofficially as the 'Stage 5' version. However, the DHLP is not yet at the stage of submission for examination, and in the present appeal both the appellants and the Council agree that it should be given limited weight. Having regard to the stage that it has reached, and the scope for further changes and objections, I agree.

## Main Issues

11. In the light of all the submissions made at the inquiry, and in writing, I consider that the main issues in the appeal are:
  - the proposed development's effects on the character and appearance of the local landscape and townscape;
  - whether it has been demonstrated that the District has an adequate supply of land for housing development;
  - and in the light of all the relevant considerations, whether the appeal proposal represents sustainable development.

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<sup>2</sup> HLP paragraphs 2.81 and 7.31

## Reasons for Decision

### *Landscape and townscape impact*

12. The appeal site lies on the upper slopes of the valley of the Alconbury Brook, close to its confluence with the River Ouse. The Ouse valley is the dominant landscape feature of the area, and to my mind this includes its main tributaries such as the Alconbury Brook. The gently shelving side slopes, together with the many flooded gravel pits in the valley floor, give this part of the valley a distinctive land form and landscape character.
13. The section of the valley in which the appeal site is located is bounded by the B1514 Thrapston Road to the south, and by the main A14 to the north, east and west, forming a discrete landscape compartment. As well as the appeal site, this stretch of the valley also contains the Hinchingsbrooke Country Park, which is a popular area for walking, fishing, camping, bird-watching and other similar pursuits. The Country Park and adjoining land is also designated as a County Wildlife Site. This juxtaposition between the distant traffic outside, and the relative quiet of the Park itself, with its woodlands, fields and lakes, enhances the sense of tranquillity and escape which is experienced in this enclosed block of countryside. These observations are also broadly in line with the character assessment in the Council's SPD<sup>3</sup>.
14. To my mind, this combination of the distinctive land form, tranquillity, and partial public access, gives this section of the valley an importance significantly exceeding that of 'ordinary' countryside. As such, the area falls within the scope of the advice in paragraph 109 of the National Planning Policy Framework (NPPF), relating to valued landscapes. The appeal site forms an integral part of this landscape compartment, and of the valued landscape that it represents.
15. Although not part of the Country Park itself, the appeal site forms part of the block of undeveloped countryside which gives the Park its visual setting and provides a buffer to its outer edge. The eastern half of the appeal site is open to view from Thrapston Road, and forms part of a sequence of views from that direction towards the valley. Although the Brook and lakes are not directly visible from here, the land form makes it evident that the valley floor is just beyond the immediate view. The western part of the appeal site is not directly visible, but its openness and absence of development is readily perceived, in views through the wide gaps between the houses in Thrapston Road, and also from the allotments and from footpath 24. The appeal site therefore contributes positively to the landscape value of this part of the valley.
16. Housing development, as now proposed, would be highly visible from all of these viewpoints, and would intrude into this important area of open countryside. To my mind this would apply particularly to the rear part of the site, where development would extend further into the undeveloped valley slope, and the presence of built development on this part of the site would be especially intrusive. At night, this harm would be further exacerbated by lighting. The proposed development would thus erode and urbanise the valley's most visible and vulnerable edge, and damage the integrity of the landscape block as a whole. As such, the development would conflict with the aims of HCS Policy CS1, HLP Policies H23 and En17, and with the NPPF advice that I have identified.

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<sup>3</sup> Huntingdonshire Landscape and Townscape Assessment Supplementary Planning Document, June 2007

17. In addition, at present the village of Brampton lies almost wholly to the south of Thrapston Road. Most of the main village facilities are concentrated around its historic centre in Church Road and the High Street, with only limited connections between these streets and Thrapston Road. Moreover, the major development now taking place at the former RAF Brampton site will have the effect of pulling the village's centre of gravity further to the south, rather than towards the appeal site. Although there is some limited development along Thrapston Road's northern side, this is intermittent and mainly confined to the frontage. Consequently, Thrapston Road acts mainly as a village edge, rather than as part of the settlement itself. Development in depth on the appeal site would breach this clear visual boundary, and would be poorly related to the village as a whole. The proposed development would therefore be at odds with the village form and settlement pattern, and detract from the semi-rural character of the village edge and its setting. This reinforces my view regarding the scheme's conflict with relevant policies, and particularly Policy CS1.
18. I agree that if the appeal site is looked at purely in isolation, it has few, if any, special qualities of its own. But in this case, for the reasons that I have explained, I consider that approach to be flawed, in that it fails to acknowledge the importance of the site's role as part of a wider, and highly valued, landscape context. The fact that the area has no special landscape designation does not preclude it from being valued. I have taken account of the existing trees and hedges on the appeal site's boundaries, and the presence of the buildings at Poplars Farm, but these do not change my view that the site forms an integral part of the valley landscape. I also note the comments made regarding the nature of the existing rear garden boundaries along Thrapston Road, but to my mind any benefits that could be gained by either strengthening or softening this boundary, are outweighed by the harmful impact of the incursion into the countryside. I accept that the claimed visual link between the appeal site and the Memorial Recreation Ground is weak at best, but this does not change my view as to the proposed development's adverse impact on the village setting.
19. I appreciate that there is no certainty as to whether the proposed extension to the Country Park will go ahead as envisaged in the HWAAP. However, I have made no assumptions on that matter. My findings on the value of the landscape, and the appeal site's contribution, are based on the extent of the Country Park as it is now. The possibility of the Park being extended up to the appeal site's boundary adds some further weight to the harm that I have identified. But, for the reasons that I have already explained, that harm would weigh heavily in any event.
20. Overall, I conclude that the proposed development would cause serious harm to the character and appearance of the area's landscape and townscape. In this respect it would conflict with Policies CS1, H23 and En17 of the adopted development plan, and with relevant advice in paragraph 109 of the NPPF. The weight to be attributed to the harm by reason of that conflict I shall return to later in this decision.

#### *The supply of land for housing*

21. There is agreement between the Council and the appellants on several elements of the five-year land supply. Both parties agree that the relevant 5-year period for the assessment is April 2017 to March 2022. The period over

which the accumulated backlog is to be counted is agreed to start from 2011, and the number of completions since then is 3,675 dwellings. There is no dispute over the use of the 'Sedgefield method', or that the size of the buffer should be 20%, or that the buffer is to be applied to the backlog as well as to the basic requirement. Importantly, it is common ground that the housing figures in the HCS are out of date, and that the supply should therefore be measured against objectively assessed need (OAN), following the guidance set out in Planning Practice Guidance (PPG). The main areas of dispute relate to how the OAN should be assessed, and the deliverability of the identified supply.

22. The Council's position is based on the OAN report by CCC's Cambridgeshire Research Group, dated April 2017. This is essentially an update of key elements of the earlier SHMA<sup>4</sup> report by the same authors in May 2013, taking account of more recent evidence. The 2017 report takes as its starting point the 2014-based DCLG Household Projections, published in July 2016, which are the most up-to-date official projections currently available. For Huntingdonshire, during the period 2011-36, these projections show a projected growth of 18,590 new households, which translates to a need for 19,140 dwellings. After sensitivity-testing and consideration of other available evidence, the report finds no need for any adjustment to the housing requirement based solely on demographic grounds. However, it does find grounds for adjustments based on employment trends and market signals. In relation to employment, taking account of the economic forecasts generated by the East of England Forecasting Model (EEFM), the adjustment would be an upward one in the order of 4%, increasing the housing requirement to 19,910 dwellings. In the case of market signals, after taking account of comparative data on house prices, house sales, rents, completions, affordability ratios, overcrowding, concealed households, and other indicators, the report concludes that an adjustment of 5% is justified, producing an alternative requirement of 20,100 dwellings. The report recommends that the higher of these two adjustments be preferred. The Council therefore contends that the basis for assessing the 5-year land supply should be 20,100 dwellings for 2011-36, equating to 804 units per annum. After taking account of completions to date and the necessary buffer, this produces a 5-year requirement of 6,203 dwellings.
23. The appellants argue for a further adjustment, of about 25 extra dwellings per annum, to counter the possible effects of the post-2008 recession and reduced housing delivery in previous decades. There is little doubt that the rate of household formation among the 25-34 age group has declined, and I agree that the cost and availability of housing is likely to have played a significant part in this. However, as Dr Gomez's evidence acknowledges, there are also other factors, such as rising levels of student debt, and changing employment patterns, which are equally likely to have had some influence<sup>5</sup>. The correlation is therefore not necessarily as simple as it might seem. Although in Huntingdonshire the fall in the headship rate has been slightly greater than some other areas, the District falls well within the range for the Housing Market Area (HMA)<sup>6</sup>, and also close to the national average. In any event, in so far as the decline in household formation results at least partly from reduced

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<sup>4</sup> Strategic Housing Market Assessment: Cambridgeshire Research Group, May 2013

<sup>5</sup> Dr Gomez's Appendix D, paras D29-30

<sup>6</sup> The Cambridgeshire and West Suffolk HMA, which also includes Cambridge, Fenland, Forest Heath, St Edmundsbury and South Cambs Districts

affordability, it seems to me that this is already reflected in the OAN report's adjustment for market signals. The further adjustment that the appellants seek would therefore appear to involve a risk of double counting. On the evidence before me, the case for this additional adjustment is not persuasive.

24. Secondly the appellants contend that the OAN report understates the adjustment that should be made for economic factors. I note that EEFM's forecast for the local rate of job growth, at 0.6%, is less than that achieved prior to the recession. But there is no real evidence for a return to pre-recession growth levels. The Experian study commissioned by the appellants suggests 0.8%, but there is no clear reason for preferring that figure to any other. Although the EEFM forecasts are at the lower end of the range considered by Mr Gomez, most of the other studies that he refers to date from 2013. The EEFM work is not only more up-to-date than this, it is also derived from, and consistent with, the national-level forecasts produced by ONS. I agree it is important that the local economy should not be constrained by a shortage of housing, but there is no evidence that this is likely. The appellants' evidence highlights the fact that Huntingdonshire has a net commuting outflow<sup>7</sup>, and also that nationally there is a trend towards older people extending their working careers beyond what would once have been seen as retirement age<sup>8</sup>. To my mind, these factors suggest that, if employment growth were to exceed expectations, due to the Alconbury Enterprise Zone or for any other reason, the prospects for filling any surplus job opportunities would not necessarily be dependent solely on additional house-building. Consequently, I do not find a compelling case to increase the adjustment in respect of employment trends or other economic factors.
25. Thirdly the appellants make a case for increasing the market signals adjustment. The affordability ratio in Huntingdonshire has worsened since 2011 by more than the national average, and this trend may be accelerating. There is no empirical evidence that an adjustment of only 5% will significantly improve that situation. But equally there is no substantive evidence to the contrary, nor to support any other alternative figure. Despite its upward trend, Huntingdonshire's affordability ratio remains one of the better ones in the HMA<sup>9</sup>. In that context, an adjustment of 5% would not be inconsistent with the levels adopted or proposed in some other local plans<sup>10</sup>. The proposed new national standard methodology is still only at the consultation stage, and thus carries limited weight. Consequently, in my view, the Council's cautious approach has some merit. Over the period of the emerging DHLP, a 5% adjustment would amount to around an additional 960 dwellings, and no reason has been advanced as to why an increase on that scale should not have some beneficial impact on prices, rents and affordability. Overall, I find insufficient evidence to justify increasing the market signals adjustment from the level proposed by the Council.
26. I appreciate that in the DHLP the Council envisages a slightly higher housing requirement of 21,000 over the plan period, equating to 840 dwellings per annum. But that figure is clearly intended as a 'policy-on' target, rather than an OAN. As the DHLP has yet to be tested at examination, this draft policy figure carries little weight. The PPG advises that where the adopted plan is out

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<sup>7</sup> Dr Gomez's proof, paras 7.56 – 7.60

<sup>8</sup> Dr Gomez's proof, para 7.41

<sup>9</sup> Mrs Roebuck's Figure 3

<sup>10</sup> Mrs Roebuck's Table 2



of date, and the emerging plan is not yet capable of carrying sufficient weight, the correct course is to refer to the latest assessment of housing needs<sup>11</sup>. In the present case that is the April 2017 OAN report. The PPG goes on to say that where the housing needs assessment has not yet been tested or moderated, this should be reflected in the weight given to it. However, this does not change the fact that it is the needs assessment, rather than any untested policy figure that should be used. In the light of all the evidence, I am satisfied that the Council's requirement figure of 6,203 dwellings is an appropriate one to use in this appeal for the purposes of assessing the 5-year supply.

27. On the supply side, the Council claims a deliverable supply of 6,582 dwellings, within the relevant 5-year period. The appellants contest the start dates and/or build rates on 13 sites. One of these is Wintringham Park, a large scheme for 2,800 units, of which the Council hopes to see 650 completed within the 5-year period. The site does not have planning permission, and indeed at the close of the present inquiry, an outline planning application was still awaited. Consequently, on the information available, the Council's delivery programme for the site, with completions starting in 2018/19, looks unlikely to be achievable. To my mind the appellants' suggestion that the timing be pushed back by 12 months seems more realistic. This reduces the overall deliverable supply by 250 dwellings, to around 6,332 units.
28. However most of the other disputed sites are further advanced in the planning process. Four of these sites, at Alconbury Weald, Brampton Park, RAF Upwood, and Windmill Row, all have planning permission for at least as many units as the numbers relied on for the 5-year supply. Although some reserved matters and other conditions remain to be discharged, there seems no reason to doubt that these can be dealt with in the time available. In the case of Alconbury, the Council's delivery programme is challenging, but the development is already well under way, and a number of different house builders are involved. Upwood apparently has some specific issues relating to the timing of handover from the RAF, and the need for demolition, but the Council does not rely on any completions here until 2020/21, and there is no evidence that these cannot be achieved. In the case of Brampton Park and Windmill Row, the numbers in dispute are fairly small, and in the context of a 5-year programme there appears more than adequate time for the issues identified by the appellants to be resolved and the required completions achieved. All of these sites are therefore deliverable.
29. Similarly, the disputed sites at Mill Cottage, Newlands and west of Station Road all appear to be approaching the successful completion of legal agreements, and Loves Farm East seems to be close to a resolution to grant outline permission. The site at George Street also has a current application running, and is an allocated housing site in the adopted development plan. As such, although none of these sites yet has planning permission, all are reasonably well advanced towards that position. If all goes as expected, the dwelling completions that the Council wishes to see on these sites look eminently achievable. This is not to say that they are certain to be achieved, but neither the NPPF nor the PPG requires such a degree of certainty. From the evidence given at the inquiry, it seems to me that all of these sites have a realistic prospect of delivery within the required period.

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<sup>11</sup> ID 3-030-20140306

30. With regard to the sites at Cromwell Road, Ramsey Road, and the former car showroom at London Road, none of these has planning permission, nor are allocated except in the emerging DHLP, nor is any the subject of a current application. But in none of these cases do the appellants challenge the principle of their inclusion in the 5-year supply, and I therefore have no reason to doubt that they will come forward for development within that period. In all these three cases the only dispute is how many of the proposed dwellings are deliverable within the 5-year period. Two are said to have potential technical issues and another having a split ownership. However, all are relatively small sites and there is no evidence that these issues are so serious as to prevent them from being counted as fully deliverable within 5 years.
31. I accept that the Council's previous forecasts of site delivery have often proved to be over-optimistic. I appreciate that on some sites a great deal of time can be taken up in protracted negotiations, not only over planning permission, Section 106 agreements and discharging conditions, but also in marketing, land disposals, subdivision and site preparation works. I also agree that officers often need to be wary of the estimates provided by parties with an interest in the land. But identifying and testing a 5-year supply can rarely be an exercise in precision. Rather, the aim is to establish what is reasonably possible and therefore realistic. With the one exception that I have identified, I am satisfied that the Council's delivery programme meets this aim.
32. The deliverable land supply is therefore not as high as the 6,582 units claimed by the Council. But nonetheless, a realistic supply of around 6,332 units has been identified. This is more than the 6,203 that are needed for the relevant five-year period, so the Council has demonstrated an adequate land supply.

#### *Sustainable development*

33. Due to its location outside the Brampton village limits, and the harm that it would cause to the landscape of the Ouse valley, the proposed development would conflict with Policies H23 and En17 of the adopted HLP. This harm to the landscape, and also to the townscape character of the village itself, also involves a further conflict with Policy CS1 of the adopted HCS. Although HCS Policy CS3 is broadly supportive of development at Brampton, the appeal proposal fails to accord with that policy, due to its location and size. Taking the development plan as a whole therefore, the appeal scheme would be contrary to all of the main relevant policies.
34. Although I have found that Huntingdonshire currently has a 5-year supply of housing land, I agree that this is to some extent despite the adopted HLP and HCS, rather than because of them. Both of these plans pre-date the NPPF, and their policies were therefore never intended to address the District's full OAN. The current 5-year supply depends on sites outside settlement boundaries, or exceeding the size thresholds in the settlement hierarchy. I therefore agree that Policies H23, En17 and CS3 are no longer fully up-to-date or consistent with the NPPF in terms of its aims for housing, and as such these policies carry reduced weight. However, this does not mean they have none at all. H23 and En17 in particular still serve an important purpose, in recognising and protecting the countryside, and this remains a relevant planning consideration. Consequently it seems to me that, in this appeal, HLP Policies H23 and En17 should continue to carry significant weight in this regard. In this context, HCS Policy CS3 adds little to these, and accordingly I give it little weight here, but



this is of no consequence in view of my conclusion above regarding Policies H23 and En17.

35. HCS Policy CS1 is neither a housing policy nor does it depend on settlement boundaries. The weight that I shall give it is therefore not affected by any of the above considerations. The concept of sustainable development which underlies HCS Policy CS1 is not the same as that set out in the NPPF, but this does not invalidate the aims behind CS1's individual criteria, including that of protecting the diversity and distinctiveness of the landscape and villages, which is relevant to the present appeal. Indeed this particular policy aim is fully consistent with the NPPF's core principles and other relevant policies. I therefore see no reason to make any reduction in weight to Policy CS1 in this appeal. Consequently, I give substantial weight to the conflict with it that I have identified.
36. Given that some relevant policies are out of date, and the development plan is silent on how current and future housing needs are to be met, I agree that the fourth bullet-point of NPPF paragraph 14's 'tilted balance' is engaged. Despite the existence of a 5-year supply, the provision of 63 additional dwellings counts as a potential social benefit, not least because 25 of the units would be affordable housing, for which there is a significant unmet need. The development would also have benefits for the local and national economy, including the creation of construction jobs, stimulating consumer spending, boosting the local labour supply, supporting local services, and CIL and Council Tax payments. Although none of these social and economic benefits would be unique to the present proposal, they would be additional to other planned developments, and therefore carry some weight. However, any measures relating to wildlife and ecology would be primarily mitigation rather than net benefits. Weighing against these would be the serious and permanent damage that the development would cause to a valued landscape, and to the character and setting of the village.
37. Overall, I consider that this visual harm significantly and demonstrably outweighs the benefits that have been identified. Accordingly, the appeal proposal would not constitute sustainable development.

### **Conclusion**

38. To sum up, the appeal proposal conflicts with the development plan, because of its unacceptably harmful impact on the local landscape and townscape. In accordance with Section 38(6) of the 1990 Act, the appeal must be determined in accordance with the relevant development plan policies unless material considerations indicate otherwise.
39. I have considered all the matters raised, including the scheme's social and economic benefits. But even after giving reduced weight to some of the relevant policies, and carrying out the NPPF paragraph 14 tilted balance, the appeal scheme does not benefit from the presumption in favour of sustainable development. The conflict with the development plan therefore stands. It follows that the appeal must be dismissed.

*John Felgate*

INSPECTOR

## **APPEARANCES**

### FOR THE LOCAL PLANNING AUTHORITY:

Mr Asitha Ranatunga, of Counsel

(Instructed by Ms Clara Kerr, Planning Services Manager)

He called:

Mrs Clare Bond BA, MA, PGDip  
Ms Charlotte Fox BSc, MA,  
LicRTPI

Team Leader, Planning Policy  
Team Leader, Development Management

Mrs Rebecca Roebuck, MEng  
Ms Michelle Bolger CMLI, DipLA,  
BA, PGCE

Research Manager, Cambs Research Group  
Expert Landscape Consultancy

### FOR THE APPELLANT:

Mr Rupert Warren QC

(Instructed by the Abbey Group)

He called:

Mr Mark Buxton BSc, MRTPI  
Mr Paul Ellis BA(Hons), DipLA  
Mr Ricardo Gomez BA, MA, PhD

RPS Group  
RPS Group  
Regeneris Consulting

### OTHER INTERESTED PERSONS WHO SPOKE AT THE INQUIRY:

Cllr Jon Chitty  
Mr Tim Fryer

Brampton Parish Council  
Adjoining resident

## **DOCUMENTS TABLED AT THE INQUIRY:**

### **TABLED BY THE COUNCIL**

- CO/1 List of appearances
- CO/2 Opening submissions
- CO/3 *Cawrey Ltd v SoS and Hinckley & Bosworth BC*, [2016]EWHC1198(Admin)
- CO/4 *Alwyn de Souza v SoS and Test Valley BC*, [2015]EWHC2245(Admin)
- CO/5 *Gladman Developments v Daventry DC and SoS*, [2016]EWCA Civ1146
- CO/6 *Shropshire v SoS, BDW Trading Ltd and others*, [2016]EWHC2733(Admin)
- CO/7 PPG extract re landscape assessment
- CO/8 Email from Charlotte Fox re landscape evidence, dated 15 September 2017
- CO/9 Email from Claire Bond re Hinchingsbrooke Country Park, dated 10 Oct 2017
- CO/10 Plan showing route of the new A14
- CO/11 Email from M Evans, Highways England, dated 10 Oct 2017
- CO/12 Email from D Abbott, Highways England, dated 12 Oct 2017
- CO/13 Email from Gavin Sylvester, re Alconbury Weald, dated 12 Oct 2017
- CO/14 Reg 122 Compliance Statement
- CO/15 *Stroud DC v SoS and Gladman*, [2015]EWHC488(Admin)
- CO/16 SoS decision and Inspector's report re: Kidnappers Lane, Leckhampton, APP/B1605/W/14/3001717
- CO/17 *Bovis & Miller Homes v SoS and others* – Court Order dated 28 July 2016
- CO/18 *Bovis & Miller Homes v SoS and others* – judgement dated 2 Sept 2016 [2016]EWHC2952(Admin)
- CO/19 Closing submissions

### **TABLED BY THE APPELLANTS**

- AP/1 Opening submissions and list of appearances
- AP/2 Extract from 'Environmental Capacity Study: Additional Site Assessments', Nov 2013
- AP/3 Extract from 'Housing and Economic Land Availability Assessment', June 2017
- AP/4 Table: dwelling completions compared to predictions (extended version of Mrs Bond's Table 1)
- AP/5 Wintringham Park leaflet
- AP/6 Copy of Council's submissions to Lucks Lane inquiry
- AP/7 Copy letter from adjoining owners re Country Park extension, 16 March 2011
- AP/8 Table: illustrative 5-year supply based on 840 pa requirement
- AP/9 Table: comparison of AMR site forecasts, 2015, 2016 and 2017
- AP/10 Extract from Highways England's A14 Traffic Impact Report, August 2015
- AP/11 Email from A Brand re additional text for S.106 agreement
- AP/12 Closing submissions

### **OTHER DOCUMENTS RECEIVED DURING THE INQUIRY**

- OD/1 Draft S.106 agreement, tabled on Day 2 of the inquiry
- OD/2 Executed S.106 agreement, completed on Day 5 of the inquiry
- OD/3 Councillor Chitty's speaking notes
- OD/4 Letter from Mr Fryer, dated 11 October 2017