

South Lakeland District Council STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT



ROGER TYM & PARTNERS
Planners and Development Economists

Main Report
March 2009

ROGER TYM & PARTNERS

61 Oxford Street
Manchester
M1 6EQ

t 0161 245 8900
f 0161 245 8901
e manchester@tymconsult.com
w www.tymconsult.com

This document is formatted for double-sided printing.

Foreword

This document is the first Strategic Housing Land Availability Assessment (SHLAA) for South Lakeland. The SHLAA considers the potential supply of housing for a range of settlements in the District over a 15 year period from a base date of April 2008. The SHLAA is a technical study of housing potential, working on the best available information at a point in time; this means it is not necessarily fully inclusive.

Between April 2008 and the publication of the final report, it is likely that some circumstances will have changed such as, for instance, resolutions to grant planning permission on particular sites. The SHLAA will be updated to ensure that the assumptions within it and the estimates of supply are as up to date as possible.

The SHLAA forms part of the Local Development Framework (LDF) evidence base, along with a range of other technical studies. It does not in any way prejudice decisions to be taken by the District Council in relation to preferred directions of growth, site identification in Development Plan Documents (DPDs) or the determination of planning applications.

South Lakeland District Council will use the SHLAA as a starting point for its consideration of which sites to bring forward as allocations in the Allocations of Land DPD. Considerable further work will be required in order to ensure that the identification of sites in the Allocations of Land DPD is based on sound and up to date information.

If you have more up to date information that you feel will be relevant to the first SHLAA update, and would help in analysing the full potential of any site, please contact the Council's Development Plans Team on (tel) 01539 717490.

South Lakeland District Council

Glossary

Abbreviation	
AAP	Area Action Plan
CFS	Call for Sites
CIL	Community Infrastructure Levy
CLG	Communities and Local Government
CNL	Cumbria and North Lancashire
DPD	Development Plan Document
DMV	Discounted Market Value
DPH	Dwellings per hectare
IPATH	Interim Planning Approach to Housing Development
LDDs	Local Development Documents
LDF	Local Development Framework
LDNP	Lake District National Park
LPA	Local Planning Authority
LSH	Lambert Smith Hampton
NLUD	National Land Use Database
PAS	Planning Advisory Service
PDL	Previously Developed Land
PPS	Planning Policy Statement
RSS	Regional Spatial Strategy
SHLAA	Strategic Housing Land Availability Assessment
UCS	Urban Capacity Study
WwN	Wastewater Network
WwTW	Wastewater Treatment Works

CONTENTS

Glossary

1	PURPOSE OF THE STUDY, STAKEHOLDER INVOLVEMENT AND STRUCTURE OF OUR REPORT	1
	Purpose of the Study	1
	Stakeholder Involvement	1
	Structure of Our Report.....	3
2	THE REQUIREMENTS OF NATIONAL AND REGIONAL POLICY	5
	Planning Policy Statement 1 (January 2005): Delivering Sustainable Development.....	5
	Planning Policy Statement 3 (November 2006): Housing	5
	Planning Policy Statement 12 (June 2008): Local Spatial Planning.....	6
	SHLAA Practice Guidance (July 2007)	8
	North West of England Plan - Regional Spatial Strategy to 2021 (September 2008)....	10
	Summary	11
3	LOCAL POLICY CONTEXT	13
	South Lakeland Final Composite Local Plan (May 2007)	13
	Interim Planning Approach to Housing Development (IPATH).....	13
	South Lakeland Local Development Framework	13
4	METHODOLOGY AND DATA SOURCES	17
	Parameters	17
	Sources of Potential Housing Sites.....	19
	The Sites Database	20
5	HOUSING COMMITMENTS, DEMOLITIONS, AND UNDER- OR OVER-SUPPLY AGAINST RSS TARGETS SINCE THE RSS BASE DATE	29
	Housing Commitments	29
	Demolitions	30
	Consideration of Under- or Over-Provision Against the RSS Targets Since the Base Date of the RSS	30
6	HOUSING YIELD ASSESSMENT	33
	Approach to Identified Sites	33
	Assessment of Whether There is a Need to Make a Small Site Allowance.....	35
	Site Yield by Category Band - Four 'Achievability' Scenarios	36
	Summary	39
7	TOTAL HOUSING YIELD AND SITE CATEGORISATION	41
	Introduction.....	41
	Contribution to the District's Dwelling Targets from SHLAA Sites.....	41

1 PURPOSE OF THE STUDY, STAKEHOLDER INVOLVEMENT AND STRUCTURE OF OUR REPORT

Purpose of the Study

- 1.1 Roger Tym & Partners has undertaken a Strategic Housing Land Availability Assessment (SHLAA) on behalf of South Lakeland District Council, covering the part of the District outside of the Lake District and Yorkshire Dales National Parks. Our remit is to consider a range of potential housing sites - covering both greenfield and previously developed land - that are wholly within, or which straddle, settlement boundaries.
- 1.2 The purpose of the SHLAA study is to establish the potential contribution towards the Council's 5-year dwelling targets from 'deliverable' sites within our study area, and the contribution to the Council's 10- and 15-year dwellings targets from further 'developable' sites, as required by PPS3. This evidence - together with the findings from a study of sites located outside settlement boundaries, which is being undertaken separately¹ - can then be used to inform the Council's LDF Core Strategy and Allocations of Land DPD.
- 1.3 As well as sites which already had planning permission for housing at the study base date (1 April 2008), we have assessed almost 500 additional sites in terms of their 'suitability', 'availability' and 'achievability' for housing development, in accordance with PPS3, the CLG's SHLAA Practice Guidance of July 2007², and the additional SHLAA preparation guidance published by the Planning Advisory Service (PAS)³. The Manchester office of Lambert Smith Hampton (LSH) was engaged as a sub-consultant to advise on 'achievability' considerations, using information obtained from consultations with local estate agents and other research.
- 1.4 **It is important to emphasise that the SHLAA is a technical study to inform decisions on allocating sites. A site's inclusion in the SHLAA does not in itself determine whether a site should be allocated for housing development in the Council's Allocations of Land DPD, and it does not guarantee planning permission for housing development.**

Stakeholder Involvement

- 1.5 Reflecting advice in the Guidance that stakeholders should be engaged in the SHLAA process from the outset, we have undertaken a range of consultation exercises to inform the study, as detailed below.

Stakeholder Seminars

- 1.6 An initial stakeholder event was held on Wednesday 12 December 2007 at the Shakespeare Centre in Kendal, attended by officers from the District Council and a range of external stakeholders including landowners, developers, housebuilders, planning consultants and agents. The purpose of the event was to brief stakeholders on the study objectives, and describe/discuss our approach to the study and technical inputs/assumptions. Following our briefing, we discussed the study process and technical inputs at length with the seminar attendees.
- 1.7 We presented our emerging study findings to a similar audience on Monday 8 December, this time at Kendal Town Hall. Our study findings were generally well-

¹ The 'Employment and Housing Land Search Study'.

² Hereafter referred to as 'the Guidance'.

³ 'Strategic Housing Land Availability Assessment Frequently Asked Questions (Jan/Feb 2008) and Strategic Housing Land Availability Assessment and Development Plan Document Preparation (July 2008).

received by attendees, who made several useful comments and observations, which we have taken on board in drafting our report.

Consultation with Strategic Public Sector Bodies and Utilities Providers

- 1.8 Early in the study we consulted with a range of strategic public sector bodies such as the Environment Agency North West and Natural England in order to identify any particular constraints that may have a bearing on the delivery of housing in South Lakeland. We also consulted utilities providers, to establish whether there are any significant utilities capacity issues in the District that we should be aware of.
- 1.9 Most of the responses that we received were general in nature. For instance, the Highways Agency did not have any specific comments to make in relation either to specific sites or the 52 study area settlements where we conducted our search for sites, and it simply asked to be kept involved in the LDF process. Similarly, the response from Natural England emphasised the need to take account of considerations such as flood risk and impact on biodiversity, although again no site- or settlement-specific issues were raised.
- 1.10 The response from United Utilities indicated that there are unlikely to be any strategic electricity and water supply capacity constraints in the District. United Utilities did provide more detailed initial comments regarding the capacity of the local Wastewater Treatment Works (WwTW) and the Wastewater Network (WwN). Whilst no insurmountable constraints were brought to our attention, the following capacity issues were identified:
- Arnside: some WwN capacity issues.
 - Beetham: small WwTW which would not cope with substantial additional development.
 - Burneside: major WwN problems.
 - Burton: WwN problems with flooding.
 - Casterton: WwTW capacity issues.
 - Flookburgh: serious WwN capacity issues.
 - Holme: some WwN capacity issues.
 - Natland and Oxenholme: some WwN capacity issues.
 - Ulverston: some WwN capacity issues.
- 1.11 Given the strategic role of the SHLAA study, we did not rule out any sites in the settlements listed above on the basis of the WwTW and WwN capacity issues identified by United Utilities. It is possible that development in areas which have capacity issues could stimulate an upgrade of the WwTW and WwN infrastructure. Therefore, at this stage we have highlighted the settlement-level capacity issues in our sites database. The Council will, however, need to take account of infrastructure capacity issues in greater detail when it decides which sites it proposes to allocate for housing and other uses.

Consultations with Local Estate Agents

- 1.12 As we noted above, LSH consulted a range of local estate agents early in the study with a view to identifying any particular, locally specific housing-related issues in any parts of the study area. LSH used the intelligence gained from these consultations when it assessed the 'achievability' of sites. It is important to emphasise at the outset that LSH's achievability assessments, and the study generally, have been undertaken as if we are operating in normal market conditions.

Call for Sites

- 1.13 We undertook a 'call for sites' (CFS) exercise between February and April 2008. Information on potential housing sites within the defined boundaries of 52 of the District's settlements was requested from an extensive list of consultees, including: landowners, housebuilders, developers, planning consultants, architects, agents, housing associations, parish councils and other members or representatives of the local community. The CFS invitation letter, which specifies the 52 study area settlements where we conducted our search for sites, is provided as Appendix 1. The CFS was also publicised in the local and national press (Westmorland Gazette, North West Evening Mail, and the London Gazette) and on the District Council's website.

Liaison with Council Officers

- 1.14 As well as the consultations outlined above, we have also liaised closely with Council officers throughout the study.
- 1.15 All of the very useful and informative dialogue described above - both with Council officers as well as the various stakeholders - has informed our work and has helped to ensure that the study outputs are as robust as possible. We submitted our draft final report and associated volumes/other outputs to the Council in December 2008. In finalising our outputs we have taken account of the very constructive feedback that we received following extensive checking of the draft study outputs by the District Council.

Structure of Our Report

- 1.16 Following this introduction, the remainder of our report is structured as follows:
- Section 2 contains a review of the national and regional planning policy contexts, as well as the Practice Guidance which dictates how SHLAAs should be undertaken.
 - Section 3 provides a review of the local planning policy context.
 - Section 4 provides details of our methodology, including the study parameters and the sources of data used to identify potential housing sites. This section also provides details of our sites database, which contains comprehensive details for each site that we assessed in the study.
 - Section 5 sets out details of housing 'commitments' in the District - that is, sites within the study area that already benefit from planning permission for residential use - and assesses whether there has been an under- or over-supply against the Regional Spatial Strategy dwelling targets since April 2003.
 - Section 6 contains details of how we categorised the sites that we assessed, and then sets out the number of sites in each category band and their potential combined yield.
 - Section 7 then sets out details of the potential contribution towards the Council's 5-year dwelling targets from 'deliverable' sites within our study area, and the contribution to the Council's 10- and 15-year dwellings targets from further 'developable' sites, as required by PPS3.
 - Section 8 then summarises the main findings from the SHLAA.

1.17 Our overall study outputs are as follows:

- Volume 1 - 'Main Report';
- Volume 2 - 'Appendices to the Main Report'⁴, which contains the following:
 - Appendix 1 - Call for Sites Invitation Letter
 - Appendix 2 - Spreadsheet Showing the Distribution of Community Services and Facilities in the District's Main Circumstances, and Plan Showing the Agreed Settlements Where we Conducted the Search for Sites
 - Appendix 3 - Assessment Factors and Criteria Used to Assess Sites' Housing Potential
 - Appendix 4 - Schedule of Category 1 Sites
 - Appendix 5 - Schedule of Category 2 Sites
 - Appendix 6 - Schedule of Category 3 Sites
 - Appendix 7 - Spatial Distribution of Category 1, Category 2 and Category 3 Sites
 - Appendix 8 - Plans Showing the Settlements Covered by the SHLAA and the Boundaries of the Sites That We Assessed
- the Microsoft Access Sites Database, which contains details of the 354 sites that we visited and assessed; and
- a MapInfo GIS layer which contains digitised polygons for the 354 sites in our Sites Database for which we have identified a theoretical dwelling yield.

⁴ Any references in our report to 'Appendices' relate to the Appendices that are contained in Volume 2.

2 THE REQUIREMENTS OF NATIONAL AND REGIONAL POLICY

Planning Policy Statement 1 (January 2005): Delivering Sustainable Development

- 2.1 PPS1 sets out overarching strategic planning policies, including the contribution that the planning system can make to the delivery of sustainable development, which is the core principle underpinning planning.
- 2.2 A key objective of PPS1 is to ensure that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities. Paragraph 27 sets out the general approach to delivering sustainable development; planning authorities should seek to:
- bring forward sufficient land of a suitable quality in appropriate locations to meet the expected needs for housing;
 - reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development; and
 - promote the use of suitably located vacant and underused previously developed land (PDL) in order to achieve Government targets.

Planning Policy Statement 3 (November 2006): Housing

- 2.3 PPS3 replaced the previous PPG3 as the statement of the national planning policy framework for delivering the Government's housing objectives. PPS3 establishes the requirement for LPAs to undertake SHLAAs which replace the housing capacity studies required under PPG3. It specifies in Annex C that a SHLAA should:
- *'Assess the likely level of housing that could be provided if unimplemented planning permissions were brought into development.*
 - *Assess land availability by identifying buildings or areas of land (including previously developed and greenfield land) that have development potential for housing, including within mixed use developments.*
 - *Assess the potential level of housing that can be provided on identified land.*
 - *Where appropriate, evaluate past trends in windfall land coming forward for development and estimate the likely future implementation rate.*
 - *Identify constraints that might make a particular site unavailable and/or unviable for development.*
 - *Identify sustainability issues and physical constraints that might make a site unsuitable for development.*
 - *Identify what action could be taken to overcome constraints on particular sites.'*
- 2.4 PPS3 states that LPAs should set out in Local Development Documents (LDDs) their policies and strategies for delivering the level of housing provision set out in the RSS, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption.
- 2.5 One of the key differences between PPS3 and PPG3 is that windfall allowances should no longer be included in the first 10 years of land supply in LDFs, unless there are *'genuine local circumstances that prevent specific sites being identified'* (PPS3 paragraph 59). This places greater emphasis on the need to identify sites which can be confidently allocated for housing in LDFs.

- 2.6 PPS3 reiterates the previous PPG3 policy that the priority for development should be PDL - in particular vacant and derelict sites and buildings - and it requires LPAs to ensure that sufficient, suitable land is available to achieve their PDL delivery objectives. However, unlike housing capacity studies under PPG3, SHLAAs are required to consider the potential of greenfield sites to deliver housing, as well as PDL.
- 2.7 PPS3 states that LDDs should include a local PDL target and trajectory, and strategies for bringing PDL into housing use. Where appropriate, the trajectory could be divided up to reflect the contribution expected from different categories of PDL - for example, vacant and derelict sites - in order to deliver the spatial vision for the area in the most sustainable way. In developing their PDL strategies, LPAs are advised (in paragraph 44) that they:
- 'should consider a range of incentives or interventions that could help to ensure that previously developed land is developed in line with the trajectory/ies. This should include:*
- *planning to address obstacles to the development of vacant and derelict sites and buildings, for example, use of compulsory purchase powers where that would help resolve land ownership or assembly issues.*
 - *considering whether sites that are currently allocated for industrial or commercial use could be more appropriately re-allocated for housing development.*
 - *encouraging innovative housing schemes that make effective use of public sector previously-developed land.'*
- 2.8 The content of PPS3, as summarised above, has clear implications for the information to be included and assessed in a SHLAA.

Planning Policy Statement 12 (June 2008): Local Spatial Planning

- 2.9 This study will form part of the evidence base upon which the Council will draw in developing its LDF and, in particular, its Core Strategy and Allocations of Land DPDs. Section 4 of the new PPS12 explains the intended nature of core strategies, gives advice on their preparation and introduces a new test of soundness. For the purposes of this report, we focus on the nature of core strategies and the test of soundness, rather than on the preparation process.

Nature of Core Strategies

- 2.10 Paragraph 4.1 of PPS12 requires that each core strategy must include:
- i) an overall **vision** which sets out how the area and the places within it should develop;
 - ii) **strategic objectives** for the area, focusing on the key issues to be addressed;
 - iii) a **delivery strategy** for achieving these objectives, which should set out how much development is intended to happen, where, when and by what means it will be delivered and with locations for strategic development indicated on a key diagram; and
 - iv) clear arrangements for **managing and monitoring** the delivery of the strategy.
- 2.11 In turn, the 'vision' should be in general conformity with the RSS and closely relate to the Sustainable Community Strategy (paragraph 4.2 of PPS12), and the 'strategic objectives' should form the link between the 'vision' and the 'delivery strategy' (paragraph 4.3 of PPS12).
- 2.12 PPS12 then emphasises that it is the delivery strategy which is central to the process. Paragraphs 4.4 and 4.5 indicate that the delivery strategy must:

- i) show how the objectives will be delivered, whether through actions taken by the Council as a planning authority, or through actions taken by other parts of the Council, or other bodies;
- ii) set out, as far as practicable, when, where, and by whom these actions will take place;
- iii) demonstrate that the agencies/partners necessary for its delivery have been involved in its preparation and that the resources that are required have been given due consideration;
- iv) have a realistic prospect of being provided in the life of the core strategy; and
- v) make clear spatial choices about where developments should go in broad terms.

Strategic sites

- 2.13 Paragraph 4.6 of PPS12 states that core strategies may allocate strategic sites for development, provided these sites are ‘...*considered central to achievement of the strategy*’; the strategy should not be held up by the inclusion of non-strategic sites. Where core strategies do allocate strategic sites, they must include a submission proposals map, but preferably with the sites delineated in outline, rather than in detailed terms (paragraph 4.7 of PPS12).

Infrastructure

- 2.14 Paragraph 4.8 of PPS12 states that:

‘The core strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution. This evidence should cover who will provide the infrastructure and when it will be provided.’

- 2.15 Thus, the infrastructure planning process that forms part of the evidence base to the core strategy should identify, as far as possible:

- i) infrastructure needs and costs;
- ii) phasing of development;
- iii) funding sources; and
- iv) responsibilities for delivery.

- 2.16 Paragraph 4.10 makes it plain that the core strategy should make proper provision for uncertainty and not place reliance on critical elements of infrastructure whose funding is unknown; it states that:

‘The test should be whether there is a reasonable prospect of provision. Contingency planning - showing how the objectives will be achieved under different scenarios - may be necessary in circumstances where provision is uncertain.’

- 2.17 Paragraphs 4.11 and 4.12 of PPS12 make it clear that there is a need to identify the infrastructure requirements of any strategic sites and that the core strategy should include policies for charging the Community Infrastructure Levy (CIL), in anticipation of when such powers come into effect.

Period of operation

- 2.18 The time horizon of a core strategy should be at least 15 years from the date of its adoption. The strategy should build in flexibility by considering the implications of different levels of development, so as to reduce the risk of unnecessary updates.

Test of Soundness

- 2.19 Paragraph 4.54 of PPS12 introduces a new test of ‘soundness’ for core strategies, as follows:

‘To be “sound” a core strategy should be justified, effective and consistent with national policy.

“Justified” means that the document must be:

- *founded on a robust and credible evidence base*
- *the most appropriate strategy when considered against the reasonable alternatives.*

“Effective” means that the document must be:

- *deliverable*
- *flexible*
- *able to be monitored’*

- 2.20 Thus, PPS12 places more emphasis on the need for development plan documents to:
- i) *‘...demonstrate that the plan is the most appropriate, when considered against reasonable alternatives.’* (Paragraph 4.38 of PPS12, our emphasis); and
 - ii) *‘...show how the vision, objectives and strategy for the area will be delivered and by whom, and when.’* (Paragraph 4.45 of PPS12, our emphasis).
- 2.21 Paragraph 5.12 of PPS12 confirms that the test of soundness for ‘other’ DPDs is the same as the soundness test for core strategies.

SHLAA Practice Guidance (July 2007)

- 2.22 Practice Guidance for undertaking SHLAAs was published by Communities and Local Government (CLG) in July 2007⁵. It supersedes the advice in the previous guidance entitled ‘Tapping the Potential’⁶, which related to housing capacity studies.
- 2.23 In paragraph 1, the Guidance states that SHLAAs are *‘a key component of the evidence base to support the delivery of sufficient land for housing to meet the community’s need for more homes’*. The Guidance emphasises that a SHLAA is significantly different from a housing capacity study, and if a recent capacity study has been carried out, further work will be needed to fulfill the requirements of the SHLAA.
- 2.24 The Guidance states that the primary role of the SHLAA is to:
- identify sites with potential for housing;
 - assess their housing potential; and
 - assess when they are likely to be developed.
- 2.25 A SHLAA should aim to identify as many sites with housing potential in and around as many settlements as possible in the study area. The study area should preferably be a sub-regional housing market area, but may be an LPA area, where necessary. As a minimum, the SHLAA should aim to identify sufficient specific sites for at least the first 10 years of a plan, from the anticipated date of its adoption, and ideally for longer than the whole 15 year plan period⁷. Where it is not possible to identify sufficient sites, the SHLAA should provide the evidence base to support judgements around whether broad locations should be identified and/or whether there are *‘genuine local*

⁵ Hereafter referred to simply as ‘the Guidance’.

⁶ DETR, December 2000.

⁷ The CLG consultation document ‘Streamlining Local Development Frameworks’ (November 2007) suggests extending the lifespan of LDF Core Strategies from 10 to 15 years. This will increase compatibility with the requirements of PPS3, which directs LPAs to identify broad locations and specific sites on which to deliver housing for at least 15 years.

circumstances that mean a windfall allowance may be justified in the first 10 years of the plan⁸.

- 2.26 Paragraph 8 makes it clear that whilst the assessment is an important evidence source to inform plan-making, it does not in itself determine whether a site should be allocated for housing development. The Guidance also states that the SHLAA should be kept up to date as part of the Annual Monitoring Report exercise, so as to support the updating of the housing trajectory and the five-year supply of specific deliverable sites.
- 2.27 The Guidance provides details on the methodology for a SHLAA which has eight main stages, and two further optional stages covering broad locations and windfalls. The stages are as follows:
- Stage 1: Planning the Assessment;
 - Stage 2: Determining which sources of sites will be included in the Assessment;
 - Stage 3: Desktop review of existing information;
 - Stage 4: Determining which sites and areas will be surveyed;
 - Stage 5: Carrying out the survey;
 - Stage 6: Estimating the housing potential of each site;
 - Stage 7: Assessing when and whether sites are likely to be developed;
 - Stage 8: Review of the Assessment;
 - Stage 9: Identifying and assessing the housing potential of broad locations (when necessary); and
 - Stage 10: Determining the housing potential of windfalls (where justified).
- 2.28 Stage 2 lists the sources of sites with potential for housing, which consist of sites currently in the planning process as well as those that are not in the planning process, namely:
- allocated employment or other land uses which are no longer required for those uses;
 - existing housing allocations, which have not yet been implemented;
 - unimplemented/outstanding planning permissions for housing; and
 - planning permissions for housing that are under construction.
- 2.29 Stage 7 assesses when and whether sites are likely to be developed. Central to this is the consideration of whether sites are suitable, deliverable and developable for housing. Suitability embraces policy restrictions, physical problems/limitations (for instance access, infrastructure, flood risk, ground conditions and contamination), potential impacts (upon the landscape and conservation) and the environmental conditions which would be experienced by prospective residents.
- 2.30 Availability considers, *'on best information available'* (paragraph 39 of the Guidance), whether there are any legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners. Achievability is essentially a judgment about the economic viability of a site. It will be affected by market factors, cost factors (including site preparation costs relating to any physical constraints) and delivery factors (including phasing and build-out rates, which mostly concerns larger sites).
- 2.31 Stage 10 relates to determining the housing potential of windfall sites, where an allowance can be justified. Any allowance for windfalls should be based on an

⁸ The term *'genuine local circumstances'* used in paragraphs 7 and 50 of the Guidance is the same term that is used in paragraph 59 of PPS3.

estimate of the amount of housing that could be delivered in the area on land that has not been identified in the list of deliverable/developable sites, or as part of broad locations for housing development. One method to estimate potential from each source is by calculating the average annual completion rate from the source, taking care to avoid double counting sites which are already included in the assessment, and coming to an informed view as to:

- whether the annual rate is likely to increase or decrease;
- whether the pattern of redevelopment is likely to remain the same, grow or decline; and
- whether current market conditions are likely to stay the same, worsen or improve in the future.

2.32 As we noted in Section 1, the Planning Advisory Service (PAS) published additional guidance relating to the preparation of SHLAAs in February and July 2008⁹, and we have taken account of any useful advice in those publications. We cover the SHLAA methodology in greater detail in subsequent sections of our report.

North West of England Plan - Regional Spatial Strategy to 2021 (September 2008)

2.33 The North West of England Plan was published in September 2008, and replaces Regional Planning Guidance for the North West (RPG13) and the Cumbria and Lake District Joint Structure Plan¹⁰. The Regional Spatial Strategy (RSS) provides a framework for development and investment in the region in the period up to 2021.

2.34 The RSS divides the region into five sub-regions (Manchester City Region; Liverpool City Region; Central Lancashire City Region; Cumbria and North Lancashire; and South Cheshire). South Lakeland is located within the Cumbria and North Lancashire City Region (CNL), and Policy CNL1 states that plans and strategies for the CNL should *'provide for development in key service centres and local service centres'*. In particular, Policy CNL2 stipulates that there is a need to *'focus on securing inward investment and improving service provision within Kendal'*, and that *'high priority should be placed on the further provision of affordable housing within the sub-area'*. Paragraph 2.27 specifically identifies Kendal and Ulverston as areas where there are *'sound opportunities'* for development outside of the National Park boundary.

2.35 Table 7.1 of the RSS sets out the regional housing targets for the period 2003 to 2021, and makes provision for 7,200 dwellings (net of clearance replacement) in South Lakeland over this period. This equates to an average net gain per annum of 400 dwellings, which is significantly higher than the previous Joint Structure Plan requirement of 265 net additional dwellings per annum. The end date of the South Lakeland LDF is likely to be 2025, i.e. 15 years from its planned adoption in 2010. The total RSS-based dwelling target for the whole LDF period is therefore 8,800 dwellings net (i.e. 7,200 net additional dwellings for the 2003-21 period, and a further 1,600 net additional dwellings in the 2021-25 period at the RSS average annual rate for the District of 400 dwellings). At this point it is worth citing the final sentence from paragraph 21 of the PAS advice note of July 2008¹¹, which states: *'It will be particularly desirable to provide an update of the [SHLAA] database at the time of DPD publication.'*

⁹ 'Strategic Housing Land Availability Assessment Frequently Asked Questions (Jan/Feb 2008) and Strategic Housing Land Availability Assessment and Development Plan Document Preparation (July 2008).

¹⁰ The North West of England Plan replaces the Cumbria and Lake District Joint Structure Plan with the exception of 20 policies which have been extended pending a future revision of the RSS.

¹¹ SHLAA and DPD Preparation - advice note (Planning Advisory Service, July 2008).

- 2.36 The RSS also sets a target that at least 50 per cent of residential development should use brownfield land and buildings. In relation to the distribution of housing provision, paragraph 7.18(i) asserts that *'general market housing should be focused in support of regeneration priorities especially within...the Furness Peninsula part of South Lakeland, in and around Ulverston'*.
- 2.37 Importantly, paragraph 7.19 explains that the housing provision figures set out in the RSS should no longer represent maximum thresholds or *'absolute targets'*. Thus, in line with the *'plan, monitor, manage'* approach which underpins PPS3, the RSS lays the foundations for a more flexible approach to housing provision at the local level, explaining that local authorities can introduce phasing policies and that the annual housing figures may be exceeded, *'where justified by evidence of need, demand, affordability and sustainability issues and fit with relevant local and sub-regional strategies'*. Conversely, the RSS also states that *'some areas will achieve lower levels [of housing provision] in the early years, for example during major housing renewal, which will be compensated later.'*
- 2.38 The flexibility described above has important implications for the 5, 10 and 15-year dwelling requirements of South Lakeland. There is a need to take account of any under-provision against the RSS targets since the 2003 base date of the RSS. We return to these issues in Section 3, although Table 2.1 shows what the 5, 10 and 15-year dwelling requirements would be if the RSS rate of 400 dwellings per annum was applied as an average rate across each of the forthcoming five-year periods.

Table 2.1 South Lakeland 5, 10 and 15-Year Dwelling Requirements (Based on the RSS Figures as an Average Across Each Five-Year Period)

Avg Dwellings/yr (same average across each 5-year period) ^a	5-Year Dwelling Requirement	10-Year Dwelling Requirement	15-Year Dwelling Requirement
400	2,000	4,000	6,000

^a The 15-year requirement assumes that the RSS target of 400 dwellings per annum will continue for a limited period beyond 2021, in accordance with the final sentence of Policy L4.

Summary

- 2.39 Sustainable development is the core principle underpinning planning, and national planning policy guidance/statements emphasise the Government's objective of ensuring the delivery of more sustainable patterns of development. To this end, LPAs are required to identify in their LDDs sufficient, suitable land in appropriate locations to enable the continuous delivery of housing for at least 15 years from the date of adoption, and are charged with promoting the reuse of vacant and underused PDL.
- 2.40 SHLAA studies are an important evidence source to inform plan-making, by identifying whether there are sufficient specific sites (both greenfield and PDL) that are capable of meeting the LPA's housing requirements. However, the Practice Guidance makes clear that the SHLAA will not in itself determine whether a site should be allocated for housing development.
- 2.41 The Government's core objective of ensuring more sustainable patterns of development is reflected in regional planning policy, which seeks to concentrate most new development within the regional centres and their inner urban areas. The RSS also aims to *'provide for development in key service centres and local service centres'*, and asserts that *'high priority should be placed on the further provision of affordable housing within the [CNL] sub-area'*.
- 2.42 The dwelling target for South Lakeland set out in the RSS represents a significant increase on the requirements specified in the now superseded Joint Structure Plan (which set a target of 265 dwellings per annum). This has clear implications for the amount of land that will need to be identified for housing in the Council's emerging LDF.

- 2.43 Furthermore, the RSS advocates that housing provision figures set out in the RSS should no longer represent maximum thresholds, and lays the foundations for a more flexible approach to housing provision at the local level.

3 LOCAL POLICY CONTEXT

South Lakeland Final Composite Local Plan (May 2007)

- 3.1 The South Lakeland Final Composite Local Plan, which was published in May 2007, comprises the Local Plan (adopted September 1997) and Alterations to the Local Plan (adopted March 2006). Although the Local Plan was originally intended to guide development to 2006, the Plan is saved (with the exception of four policies¹²) under the terms and provisions of the Planning and Compulsory Purchase Act 2004, pending completion of the Local Development Framework.
- 3.2 Nevertheless, the Local Plan and Alterations were produced prior to the publication of the approved RSS, which sets a target of 7,200 net additional dwellings until 2021, at an average rate of 400 dwellings per annum¹³. Thus, the housing provision figures set out in the adopted Local Plan are out of date. Notwithstanding this, it is worth noting that the Local Plan seeks to concentrate development in the existing centres of Kendal, Ulverston, Grange over Sands, Milnthorpe and Kirkby Lonsdale, and in Policy H8 it emphasises the need to ensure that where appropriate, an agreed proportion of new housing will be affordable to meet local need.

Interim Planning Approach to Housing Development (IPATH)

- 3.3 The IPATH was introduced in November 2005 as a means of implementing the policies of the now superseded Cumbria and Lake District Joint Structure Plan, in relation to housing provision, affordable housing and local occupancy.
- 3.4 In March 2007 the Council approved a revised IPATH prescribing that '*All new dwellings in the East of the District are required to have a local occupancy condition, and that to ensure the 50 per cent requirement for affordable homes in the East Area of the District, all housing sites of 4 or more units are required to provide at least half the units as affordable*'. In the west of the District, the IPATH stipulates that '*new dwellings are not required to be subject to a local occupancy condition, except for affordable housing*', and that the proportion of affordable housing units should be determined on a '*case-by-case basis on sites of 10 or more dwellings*'.
- 3.5 In July 2008 the Council conducted a review of the IPATH, and approved a report setting out recommendations to be incorporated into a modified IPATH and Companion Guide. In summary, the report confirms that the revised IPATH (March 2007) will remain unchanged, but clarifies that there is '*flexibility to reduce the 50 per cent affordable housing requirement in accordance with independently assessed evidence*'.
- 3.6 The Council has commissioned a study to examine the impact of a range of policy option requirements relating to affordable and local occupancy, to inform policy in the Core Strategy.

South Lakeland Local Development Framework

Allocations of Land Development Plan Document - Discussion Paper (November 2008)

- 3.7 In November 2008 the District Council published a discussion paper on the emerging Allocations of Land Development Plan Document (DPD). Section 5 ('A Balanced

¹² Policies R3, C4, C17 and Tr6 expired on 27 September 2007.

¹³ As we noted in Section 2, the end date of the South Lakeland LDF is likely to be 2025, i.e. 15 years from its planned adoption in 2010. The total extrapolated dwelling target for the whole LDF period is therefore 8,800 dwellings net (i.e. 7,200 net additional dwellings for the 2003-21 period, and a further 1,600 net additional dwellings in the 2021-25 period at the RSS average annual rate for the District of 400 dwellings).

Housing Market’) reiterates the housing targets set out in the approved RSS, and anticipates that rolling forward these targets to 2025 will necessitate the release of 175 to 250ha of land for housing over the plan period.

- 3.8 The discussion paper highlights the need to *‘achieve a sustainable distribution of development’*, and asserts that the sites allocated in the DPD must be consistent with the emerging Core Strategy *‘preferred locational strategy’* of concentrating development in the Principal Service Centres of Kendal and Ulverston, the Key Service Centres of Grange over Sands, Kirkby Lonsdale and Milnthorpe, and a number of designated Local Service Centres in the rural hinterland.
- 3.9 The discussion paper also points out that there is a disparity between local incomes and prevailing property prices, and that this has resulted in an acute shortage of affordable housing across the District. Accordingly, the paper suggests that there may be a need to allocate sites specifically for affordable housing development.

South Lakeland Core Strategy Preferred Options (April 2008)

- 3.10 The strategic framework for the District will be progressed through the Core Strategy. Given the nature of our current remit, we necessarily focus below on key housing issues, although it is important to emphasise that land will be required within the existing settlement boundaries for other (non-housing) purposes, including the need to make a significant provision of employment land.
- 3.11 The District Council published its Core Strategy Preferred Options Report for consultation in April 2008. The Report envisages that development will be concentrated *‘in the principal service centres of Kendal and Ulverston and to a lesser extent in the key service centres of Grange over Sands, Milnthorpe and Kirkby Lonsdale’*. Emphasis is placed on achieving a *‘balanced housing market’*, and this is reflected in the first Strategic Objective which seeks to *‘meet the housing need of all the community by providing a range of housing, including affordable and special needs housing’*.
- 3.12 Preferred Option 4 (‘Balanced Housing Market’) seeks to achieve a *‘continuous supply of residential land’* and asserts that *‘Measures will include the phasing of allocated land to ensure that allocations deliver the housing requirement’*. Furthermore, development will be required to achieve a minimum density of 30 dwellings per hectare, and will be expected to make provision for an element of affordable housing, as follows:

Table 3.3 Core Strategy Preferred Options Affordable Housing Requirements

Housing Market Area	Affordable Housing Requirement (%)		
	Housing Developments of 10 or More Dwellings	Housing Developments of 4 to 9 Dwellings	Developments of Less Than 4 Dwellings
Ulverston and Furness	50	30	Financial contribution towards affordable housing provision in the Housing Market Area
Kendal	50	30	
Milnthorpe	50	30	
Rural Kendal (excluding Milnthorpe)	60	40	
Cartmel Peninsula	60	40	

- 3.13 Preferred Option 4 also asserts that *‘30 per cent of residential development across the District will be required to be for non-affordable local occupancy’*. However, there will be sufficient flexibility to *‘vary the requirements for affordable and local occupancy in individual cases on the basis of financial appraisals indicating developments are not viable’*. A restriction will also apply to *‘all new development preventing their use as second homes’*.

- 3.14 The Council will take account of consultation responses and intends to publish the Core Strategy in summer 2009.

4 METHODOLOGY AND DATA SOURCES

Parameters

Study Area

- 4.1 The SHLAA study covers the part of South Lakeland District that is located outside of the Lake District and Yorkshire Dales National Parks. Our remit is to consider sites within existing settlement boundaries; the Employment and Housing Land Search Study which is being undertaken in parallel with the SHLAA is assessing sites outside existing settlement boundaries¹⁴.

Settlements Where We Conducted a Search for Sites

- 4.2 In order to identify new sites, over and above outstanding permissions, we needed to identify the settlements within South Lakeland which appear to offer the most realistic potential for housing in sustainable locations. In producing the Core Strategy Issues and Options report of November 2005, the District Council assessed the facilities and services in each settlement identified in the Local Plan as suitable for growth.
- 4.3 Using this information on the existing provision of key services and facilities - supplemented by our own analysis of the distance to main settlements and the primary road network - we produced an initial list of 50 settlements (from well in excess of 100 across the study area) where we intended to undertake the search for sites. We presented the draft list of list of 50 settlements at the first stakeholder seminar, which was held in Kendal during December 2007. Following a period of consultation, an additional two settlements - Grayrigg and Lindal - were identified as having potential to accommodate additional residential development.
- 4.4 The agreed list of 52 settlements where we conducted the search for sites is as listed in Table 4.1 below, and the plan at the rear of Appendix 2 depicts the 52 settlements graphically. Appendix 2 also contains a spreadsheet which provides an indication of the distribution of community services and facilities in the 52 settlements, based on the information supplied by the District Council¹⁵. The spreadsheet shows that some of the smaller villages contain few (or, in some cases, none) of the services and facilities. We conducted a search for sites in these settlements because of the advice in paragraph 7 of the Practice Guidance that a SHLAA study '*should aim to identify as many sites with housing potential in and around as many settlements as possible in the study area*'. It will, however, be for the Core Strategy to determine which settlements are the most appropriate for growth, taking account of existing services and facilities, and how to best meet looking development needs.
- 4.5 Of the 354 sites that we assessed, none are located in Gatebeck, Grayrigg, Hutton Roof, Lindal-in-Furness, Loppergarth or Newbiggin¹⁶.

¹⁴ We have also considered a relatively small number of sites that straddle existing settlement boundaries, or sites immediately adjacent to the boundaries where this would constitute the 'rounding off' of the urban area.

¹⁵ The Council did not supply us with information for Grayrigg and Lindal because they do not have settlement boundaries in the adopted Local Plan.

¹⁶ Maps for these settlements are therefore not included in Appendix 8.

Table 4.1 SHLAA Study Area Settlements Where We Conducted a Search for Sites

Kendal	Bardsea
Ulverston	Baycliff
Grange Over Sands	Beetham
Milnthorpe	Casterton
Kirkby Lonsdale	Gleaston
Arnside	Heversham
Levens	Sedgwick
Burton	Sandside
Allithwaite	Barbon
Cartmel	Leece
Kirkby-in-Furness	Old Hutton
Holme	Stainton-with-Adgarley
Grayrigg	Loppergarth
Great Urswick	Scales
Burneside	Leasgill
Broughton-in-Furness	Little Urswick
Greenodd / Pennybridge	Newbiggin
Lindal-in-Furness	Slackhead
Natland	Ackenthwaite
Storth	Brigsteer
Swarthmoor	Carr Bank
Endmoor	Gatebeck
Cark	Hutton Roof
Flookburgh	Low Park (Endmoor)
Oxenholme	Old Hutton, Bridge End
	Old Hutton, Middleshaw
	Ravenstown

Legend

	Key Service Centre (as defined in the approved Regional Spatial Strategy/adopted Structure Plan) x5
	Proposed Local Service Centre (as identified in the District Council's Core Strategy Issues & Options Papers) x20
	Other Settlement with Development Boundaries (as identified in the adopted Local Plan) x27
Total: 52 Settlements	

Time Horizon

- 4.6 LPAs are required, by paragraph 53 of PPS3, to set out in LDDs their policies and strategies for delivering the level of housing provision required by the approved RSS, or the emerging RSS if the approved RSS is being reviewed. LPAs are required to *'identify broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption.'*
- 4.7 Paragraph 54 of PPS3 states that LPAs should *'identify sufficient specific deliverable sites to deliver housing in the first five years'* from adoption of the relevant LDD. Paragraph 55 goes on to state that LPAs should also *'identify a further supply of specific, developable sites for years 6-10 and, where possible, for years 11-15. Where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated.'* In Sections 6 and 7, we provide details of the contribution to the Council's dwelling targets from sites which we have assessed as being 'deliverable', 'developable' or 'least developable'.

- 4.8 The requirements of paragraphs 53 to 55 of PPS3 are carried through into the Guidance, paragraph 5 of which requires LPAs to *'identify specific, deliverable sites for the first five years of a plan that are ready for development.'* Paragraph 7 of the Guidance further states that a SHLAA should *'as a minimum...aim to identify sufficient specific sites for at least the first 10 years of a plan, from the anticipated date of its adoption.'*
- 4.9 Thus, both PPS3 and the Guidance require LPAs to identify sites from the date of adoption of the relevant DPD. However, adoption of the District's Site Allocations DPD is not anticipated until 2010¹⁷. We have therefore necessarily used the study base date of 1 April 2008 as the starting point in assessing the 5 year land supply, rather than the DPD adoption date.
- 4.10 In accordance with the Guidance, the SHLAA should be regularly kept up-to-date as part of the Annual Monitoring Report exercise, so as to support the updating of the housing trajectory and the rolling five-year supply of specific deliverable sites.

Minimum Site Size Threshold

- 4.11 Analysis of NLUD returns made prior to 2003 demonstrated that a 0.25ha size threshold would reduce the total number of sites by 50-60 per cent, while only reducing the total PDL land area by 3-4 per cent. Accordingly, a 0.25ha threshold was introduced to NLUD in 2003 (this applies across all of England except London, where a threshold of 0.1ha applies). English Partnerships' 0.25ha threshold had the desired effect; the number of sites returned by local authorities post-2003 decreased considerably but this had only a minimal effect on the total land area.
- 4.12 Accordingly, in SHLAA studies, we normally suggest a site size threshold of 0.25ha, with sites above this size typically being able to accommodate 10 or more dwellings. However, we understand that a minimum site size threshold was not used for the UCS undertaken in 2004, and furthermore, the second bullet under paragraph 25 of the Guidance states: *'in areas dominated by rural settlements, it may be necessary to identify all the sites with potential for housing'* (our emphasis). In order to reflect this advice - and for consistency with the UCS - it was considered appropriate not to use a minimum site size threshold for this SHLAA study.

Sources of Potential Housing Sites

- 4.13 PPS3 sets a clear expectation that the supply of land for housing should be based upon specific sites and, where necessary, broad locations. The main tool used in the assessment was therefore our Microsoft Access database of sites with a recognisable opportunity for residential development. The database is used to store all the data gathered in the study and is coded to automatically assign each site to one of three 'Category' bands (corresponding to 'deliverable', 'developable' and 'least developable'¹⁸) based on the site's performance against pre-agreed assessment criteria (as described in Section 6 of our report). The database also generates a theoretical dwelling yield for each site.
- 4.14 Figure 4 of the Guidance provides a list of possible sources for identifying potential housing sites. The list includes sites that are already in the planning process as well as sites that are not currently in the planning process. In the early stages of the study we compiled an initial list of potential housing sites, drawing upon the sources listed in Figure 4, but broadening it slightly to include other sources.
- 4.15 The sources that we used to identify the initial list of sites are specified below. These sources are in addition to unimplemented/outstanding residential planning

¹⁷ According to the South Lakeland LDF Local Development Scheme (September 2008).

¹⁸ These definitions match those specified in paragraphs 54 and 55 of PPS3, which are carried through into paragraphs 5 and 33 of the SHLAA Practice Guidance.

permissions, which are considered as a potential source of supply irrespective of where the sites are located (details of the supply from extant permissions are provided in Section 5 of our report):

- sites identified from the previous Urban Capacity Study of 2006;
- employment and open space sites that are considered to be potentially surplus;
- sites identified from the Ulverston Canal Masterplan;
- sites identified within the Grange over Sands Regeneration Study and the Kendal and Canal Head Area Action Plan;
- unimplemented and proposed housing allocations;
- sites from the latest NLUD return;
- sites identified through the 'call for sites' exercise; and
- other sites brought to our attention by the Council, including sites put forward through other consultation exercises, or separately.

4.16 Our initial list of potential housing sites - compiled from the sources listed above - contained over 800 sites, although at that stage there was a significant amount of duplication (that is, sites which had been identified from multiple sources). We then removed: all duplicates; sites which officers from the Council considered to have no realistic prospects for housing; and sites that were not within existing boundaries of the settlements where we agreed to conduct the search for sites.

4.17 Following the site visits, and after further detailed consultation with the Council, it was agreed that a number of sites (118) should be excluded from the yield assessment (although for completeness and transparency they remain in the Access database). A 'nil yield' has been assigned to sites where any of the following apply:

- the site is in active employment uses and SLDC consider that this should remain the case;
- the site received planning permission before the study base date of 1 April 2008, or is under construction/has been developed (please note that any sites with planning permission that was due to expire by 31.03.09 have not been treated as commitments and have been assessed in the same way as all other sites in the SHLAA - refer to paragraph 5.4 for further details);
- SLDC considers that the site is too small or inaccessible to be developed;
- the site is within Flood Zone 3b - refer to paragraph 6.10 for further explanation;
- the site was mistakenly included in the original list of sites to be assessed; or
- the site was a private garden for which potential availability is unclear.

The Sites Database

4.18 After applying the various filters described above, the initial list of potential housing sites was reduced to 354. It is important to reiterate that the remit of this SHLAA study is to assess sites that are within existing settlement boundaries, although some sites have been included where their development would constitute a 'rounding off' of the existing urban area.

4.19 We visited each of the 354 sites in our database and, with a few exceptions as detailed below, assessed their potential for housing and the number of dwellings that could theoretically be provided at each site, taking into account the findings from our field visits. Some of the 354 sites are low value public recreation sites, and others are non-publicly accessible important open spaces.

- 4.20 We did not identify a theoretical dwelling yield for the 'open space' sites referred to above, because as a group these sites are not considered suitable for development¹⁹. Although these sites remain in the database, and we have assessed their potential for housing (which amounts to a total theoretical yield of 2,933 dwellings), this information has therefore been intentionally omitted from the overall supply figures. Additionally, we assigned a nil yield to those sites from the Urban Capacity Study which appeared to be private back gardens with no apparent prospect of coming forward for development. The overall supply figures in subsequent sections of the report therefore refer to the potential dwelling yield from the remaining 259 sites.
- 4.21 The contribution to the housing supply of sites with planning permission is assessed through separate analysis (as detailed in Section 5 of our report). These 'committed' sites therefore do not feature in our database, although because the study has a base date of 1 April 2008, it is important to note that some of the sites in the database might have since been granted planning permission for residential use in the intervening period. This issue will be addressed through the first annual update of the study.
- 4.22 Each of the 354 sites is represented as a 'polygon' (i.e. an area with boundaries) on an OS base map in our MapInfo GIS. For each site a unique identifier was created and more detailed information on each of the 354 sites is contained in the associated Microsoft Access sites database, which is split into five parts as detailed below.

Database Reference Fields

- 4.23 For each site, basic reference details and other factual information are always visible at the top of the database, whether Part 1, 2, 3, 4 or 5 of the database is selected. The standard reference fields are specified in Table 4.2.

Table 4.2 Sites Database - Reference Fields

Data Field	Form of Data/Possible Options
RTP unique ref	Sequential site numbering system, providing each site with a unique reference.
Source ref (if available)	Taken direct from Council or other sources.
Source type	Options are: Call For Sites; SLDC Low Value Sites; Open Space Study; Grange over Sands Regeneration Study; Urban Capacity Study 2006 - Constrained Potential/Excluded or Discounted; SLDC Identified Sites; SLDC Paper Maps; Proposed Allocations - Residential; Proposed Allocations - Mixed; SLDC Proposed Development Boundary Alterations; Kendal Head Area Action Plan; Ulverston Canal Masterplan; Residential Sites; and NLUD.
Other source types (if available)	Other source(s) of site, only applicable if the site was identified through multiple sources. Same options as for 'source type'.
Grid reference	Easting and northing of the site centroid, generated by GIS
Site name & address	Site name (where applicable) and approximate address, based on the site's geographic location. Generated from GIS or entered manually if a Call for Sites submission.
General information/other comments	Free-text box which contains other relevant information and findings from site visits.

¹⁹ We did identify a theoretical dwelling yield for a small number of low value public recreation sites which the Open Space study considered to be potentially surplus to requirements, and a few of the 'non-publicly accessible important open space' sites arising from the call for sites exercise, where landowners or others requested that their development potential be considered.

Database Part 1 - Site Details and Planning Status

- 4.24 The first part of the database contains a range of contextual and factual information about the sites (gross site area, land type, and so on), much of which was collected as a desk-based exercise and using GIS. This part of the database also contains our 'Overall Site Categorisation' rating for each site (1, 2 or 3). Details of how we categorised sites are provided later in our report.
- 4.25 Our assessment of any permanent features that would be likely to affect the site's potential for housing development, based on the findings/observations from our site visits, is provided in the first part of the database.
- 4.26 The full list of fields/information contained within Part 1 of the database is shown in Table 4.3.

Table 4.3 Information Contained in Part 1 of the Sites Database

Topic	Data Field	Form of Data/Possible Responses
Site Details	Site area in hectares (gross)	Automatically created using GIS by measuring the area of land within the site polygon
	Land type	Greenfield or previously developed land
	Current land use	Options are: agriculture & related incl. forestry; community services; minerals; open space; industry & business; other*; recreation & leisure; residential; retail; transport); and utilities & infrastructure [*if 'other' is selected, details of the current land use are provided in a second free-text box].
	Surrounding land use	Options are: agriculture & related incl. forestry; community services; minerals; open space; industry & business; other; recreation & leisure; residential; retail; transport; or utilities & infrastructure
	Character of surrounding area	As assessed on site
	Other relevant site details	As assessed on site

Database Part 2 - 'Suitability' Information

- 4.27 The second part of the database provides details of any physical or bad neighbour constraints which might affect the site's potential for housing development, as well as our initial assessment of whether the site is suitable for housing only, or housing as part of a mixed-use development²⁰.

²⁰ We return to this issue later in our report.

Table 4.4 Information Contained in Part 2 of the Sites Database

Data Field	Form of Data/Possible Options
Access infrastructure	On-site assessment of whether extensive new access infrastructure would be required in order to facilitate housing development
Drainage infrastructure	On-site assessment of whether extensive new drainage infrastructure would be required in order to facilitate housing development
Ground condition constraints	On-site assessment of whether extensive ground treatment is likely to be required in order to facilitate housing development
Bad neighbour constraints	As assessed on site. Possible responses are 'none'; potential for 'mitigation'; or 'major constraints'
Mixed-use potential	Initial assessment of whether the site is suitable for housing only, or housing as part of a mix of uses

Database Part 3 - 'Availability' Information

- 4.28 In Part 3 of the database, we provide details of anything which we consider might affect availability, reflecting our observations from the site visits. We also identify whether the site is immediately available, and if not, whether it could be made available within 5 years. For a site to achieve an overall Category 1 rating, it would have to be capable of being made available within 5 years.

Database Part 4 - Yield Assessment

- 4.29 For each identified site it was necessary to estimate the potential housing yield. In order to do this, we applied a series of factors as detailed below. The differing percentages for each factor have been derived using our experience of previous developments in similar areas, and were agreed in advance with our client.
- 4.30 For a small number of sites a yield figure was entered manually instead. The main example of this relates to call for sites submissions, which often specify the number of dwellings that the developer intends to provide at the site. With these sites, if the number of dwellings proposed would result in a development density that is appropriate in the local context, then we have inserted the yield figure manually.

(i) Gross site area

- 4.31 Where two or more sites contain areas that overlap, the common area of land is only considered as part of one site and is discounted from any others to avoid double counting. The gross site area specified in the database is the area within the digitised site polygon after this process was completed, measured using GIS.

(ii) Permanent features factor

- 4.32 A factor was then applied to represent the percentage of the gross site area likely to be available for housing after account has been taken of any special site specific capacity constraints relating (for example) to site shape, topography, obstructions to development (e.g. substations) or water bodies. Site constraints, and the appropriate percentage reduction, were assessed on a site by site basis for all 354 sites.

(iii) Gross to net factor

- 4.33 A gross to net factor was applied to the residual site area following application of the permanent features factor. The gross to net factor takes account of any requirements to provide supporting facilities on the site. We have adopted the most up-to-date advice on net density, namely that contained in Annex B of PPS3 which states that net dwelling density is calculated by:

'...including only those site areas which will be developed for housing and directly associated uses, including access roads within the site, private garden space, car parking areas, incidental open space and landscaping and children's play areas, where these are provided.'

- 4.34 For the largest sites (above 10ha), the gross to net factor that we applied was 50 per cent, to allow for significant additional infrastructure such as schools, community facilities, roads, green spaces and so on. For sites of between 0.4ha and 10ha, the amount of additional infrastructure required will be much less, and so a greater proportion of the site can be allocated to housing. Consequently, we have applied a less severe ratio for sites with a gross area of between 0.4ha and 10ha. For sites up to 0.4ha, the amount of additional infrastructure that is required is assumed to be negligible. This is because these sites should be capable of utilising existing infrastructure, and also because smaller sites will not generate a need for significant new supporting infrastructure. For sites with a gross area up to 0.4ha, we have therefore applied a gross to net factor of 100 per cent.
- 4.35 It should be noted that, in reality, each site would be considered individually as and when it is taken forward for allocation or proposed for development. Nevertheless, the gross to net ratios that we applied for the purposes of our yield assessment are as set out in Table 4.5.

Table 4.5 Gross to Net Ratios

Gross Site Area (ha)	Percentage Net
Up to 0.4ha	100%
0.4ha to 2ha	90%
2ha to 10ha	75%
Over 10ha	50%

(iv) Mixed use factor

- 4.36 A mixed use factor of 50 per cent was applied to sites most likely to be developed for mixed uses, to indicate the notional proportion of the net site's total capacity which is assumed to generate residential use, regardless of whether the mix of uses is horizontal or vertical. The majority of the sites that this factor applies to are located in Kendal and Ulverston, and were identified through a combination of our site visits and officer knowledge.
- 4.37 Again, each site would need to be considered in more detail on a case-by-case basis as and when it came forward for development. These sites will need a mixed use policy rather than a housing allocation and a separate employment allocation. In any event, as we indicated above, most of the sites in the database have been treated as pure housing sites.

(v) Density assumptions

Policy guidance

- 4.38 Paragraph 46 of PPS3 states that LPAs should develop housing density policies having regard to:
- the spatial vision and strategy for housing development in their area, including the level of housing demand and need and the availability of suitable land in the area;
 - the current and future level and capacity of infrastructure, services and facilities such as public and private amenity space, in particular green and open space;
 - the desirability of using land efficiently and reducing, and adapting to, the impacts of climate change;

- the current and future levels of accessibility, particularly public transport accessibility;
 - the characteristics of the area, including the current and proposed mix of uses; and
 - the desirability of achieving high quality, well-designed housing.
- 4.39 Para 47 of PPS3 states that while LPAs may wish to set out a range of densities across the plan area, 30 dwellings per hectare (dph) net should be taken as a national indicative minimum to guide policy development and decision-making, until local density policies are in place. Densities below this minimum will need to be justified according to such factors as those listed above.
- 4.40 The Secretary of State recommended that the RSS for the North West should include a policy on housing density, specifying a minimum of 30 dph with higher levels in urban areas. However, these proposals were not incorporated, and the recently published RSS contains no specific figures or proposals regarding density of development in the region.
- 4.41 Paragraph 8.33 of the South Lakeland Local Plan (Final Composite Plan version²¹) states that '*the District Council will seek to secure provision of residential development on appropriate sites at an average density of 30 units per hectare*'. The Council's latest proposals for public consultation also require a minimum residential density of 30 dph. Preferred Option 4 ('Balanced Housing Market') from the Core Strategy Preferred Options document states: '*Policies will require that developments achieve a minimum density of 30 dwellings to the hectare, taking into account the character of the local area and policies on sustainable development principles.*' Preferred Options 11 to 16 - which set out proposals for the future of the various settlements in the District - all anticipate an (indicative) average development density of 40 dph.
- Analysis of density trends & assumptions for the SHLAA study
- 4.42 Our analysis indicates that the achievable density range across the District is generally of the order 30 to 50 dph (although there are some exceptions where densities below 30 dph are being achieved). The aspiration should therefore be to meet the minimum recommended by PPS3 in all parts of the study area, although we do consider that in practice achieving densities significantly above 30 dph at the more rural sites might prove challenging.
- 4.43 The status of Kendal and Ulverston as the largest towns in the District provides opportunities for much higher residential densities. Over the last few years densities in the centre of these towns have averaged well over 100 dph. An average level of 100 dph is therefore an achievable target for developments in these two town centres.
- 4.44 The District also contains several smaller Key Service Centres: Grange-over-Sands, Kirkby Lonsdale and Milnthorpe. Although the densities achieved in the centre of Kendal and Ulverston are unlikely to be achievable in these smaller centres, they do nevertheless offer a range of key local services and as such development close to these centres should be expected to support a higher level of density.
- 4.45 In order to promote sustainable development, public transport should also be taken into account when determining housing densities. Consequently, a site's proximity to a rail link should allow an increased density of development.
- 4.46 The density assumptions that we used in assessing housing potential are set out in the following table:

²¹ The Final Composite Plan was published in September 2007. It combines the South Lakeland Local Plan (adopted in 1997) and the Alterations to the Local Plan (adopted in March 2006).

Table 4.6 Density Rates Applied in the SHLAA Study

Site Location Characteristics	Density (dph net)
Within 200m of centre of Kendal or Ulverston.	100
Between 200m and 400m of centre of Kendal or Ulverston or within 200m of centre of Grange-over-Sands, Kirkby Lonsdale or Milnthorpe.	70
More than 400m from centre of Kendal or Ulverston but within the settlement boundary OR between 200m and 400m from centre of Grange-over-Sands, Kirkby Lonsdale or Milnthorpe Town Centres or any railway station.	50
Between 400m and 800m from centre of Grange-over-Sands, Kirkby Lonsdale or Milnthorpe or any railway station and outside settlement boundaries of Kendal or Ulverston.	40
More than 800m from centre of Grange-over-Sands, Kirkby Lonsdale or Milnthorpe or any railway station and outside settlement boundaries of Kendal or Ulverston.	30

4.47 The theoretical potential dwelling yield of any identified site is then calculated by:

Gross site area x permanent features factor x gross to net factor x mixed use factor x density

4.48 At the bottom of the fourth part of the Access sites database are two fields entitled 'Net residual site area available for housing (ha)' and 'yield'; these figures are the residual area and theoretical housing yield after the factors described above have been applied.

4.49 In practice, the Council will have to undertake more detailed work on the densities that are achievable at any given site, as and when it is brought forward for development. Furthermore, our guideline capacities for very large sites must be treated with caution as we can not foresee the mix of uses that these locations might be called on to accommodate. Nevertheless we consider that the consistent framework shown in the table above is appropriate for the purposes of this strategic assessment.

Database Part 5 - GIS-Based Information

4.50 Part 5 of the Access database contains scores for each site against a total of 10 assessment factors and criteria - consistent with the factors and criteria referred to on pages 16 and 17 of the Guidance - under the headings 'suitability', 'availability' and 'achievability'. The specific assessment factors and criteria, and the potential scores that could be assigned under each, are contained in full at Appendix 3.

4.51 The criteria are a combination of those for which a score can be generated automatically using GIS (such as whether the site is within a particular Flood Risk Zone) and those for which we had to apply our professional judgement (for instance, in relation to the extent of physical constraints affecting the site). A score of between 0 and 5 was possible under each assessment criterion, whereby a major constraint and/or severe adverse impact scores 0 (minimum), and a significant positive feature or absence of adverse impact scores 5 (maximum). The use of a common scoring base ensures that, as far as possible, the scoring of sites is transparent and easily understood. Moreover, it highlights any potentially unacceptable aspect of the development of an individual site, irrespective of that site's overall assessment rating. Thus, the maximum score that a site could achieve is 50 (i.e. 10 criteria x 5).

4.52 It is therefore possible to compare individual sites' performance relative to other sites in terms of their overall 'score' out of 50. However, we caution against prioritising sites using a simple scoring approach. Whilst the GIS-based site assessment provides a good indication of each site's performance against a broad range of important

measures, we consider that a supplementary assessment is still necessary to ensure that certain 'core' constraints are taken into full account. The information contained in Part 5 of the database is thus important, but it only forms the first step in our site categorisation exercise (full details of which are contained in Section 6 of our report).

- 4.53 Furthermore, whilst paragraph 83 of the draft version of the SHLAA Guidance suggested that SHLAAs could '*develop an indicative rank of sites*', this was not carried through into the final version of the Practice Guidance. Thus, the individual scores in Part 5 of the database are provided for information purposes only (and have not been published in the SHLAA), so that the Council can see how sites perform against individual criteria, and in order to provide an indicative initial comparison of sites.

LSH 'Achievability' Assessment - 4 Scenarios

- 4.54 The 'achievability' assessment of sites was carried out by LSH under four different policy scenarios. LSH applied its professional judgement in undertaking the achievability assessments, which were also informed by intelligence gained from the consultations with local property market agents.
- 4.55 In assessing the marketability of sites, LSH assumed that the Council's current local occupancy requirement would reduce dwelling values by 20 to 30 per cent in rural areas, with a lesser impact in larger towns. In terms of affordable housing, LSH considered that it would be realistic on greenfield sites (with agricultural land value) to achieve 50 per cent of the dwellings as affordable units, based on this being shared equally between social rented units and shared equity (or discounted market value, 'DMV') and a small proportion only being for local occupancy.
- 4.56 For brownfield land, LSH considered that requiring 50 per cent affordable dwellings with 50 per cent local occupancy would often reduce land values below their existing use values. LSH suggested that the affordable housing requirement on brownfield land should be reduced to 25 to 30 per cent (shared equally between social rented and shared equity/ DMV, with DMV not lower than 75 per cent of open market value; and that the local occupancy requirements be reduced to 20 per cent in larger towns and to 5 to 10 per cent in rural areas.
- 4.57 Given the relatively stringent nature of the IPATH requirements, it was deemed prudent to assess achievability under a range of affordable and/or local occupancy to open market housing ratios, in order to demonstrate how different approaches to affordability requirements could potentially affect the achievability of sites, and therefore the theoretical dwelling supply. It should be noted that the range of scenarios that we tested is not exhaustive, and that in practice other permutations may arise. Each of the four 'achievability' scenarios that we considered in this study is summarised, below:
- **Scenario 1:** sites >4 units must provide 50 per cent of dwellings as affordable, with the remaining 50 per cent as local occupancy. On sites 4 units or smaller, all dwellings must be provided for local occupancy.
 - **Scenario 2:** In the east of the District this scenario follows Scenario 1 but allows 20 per cent of the housing designated for local occupancy to be sold on the open market. In the west of the District, sites of greater than 10 units must provide 50 per cent of dwellings as affordable with the remaining 50 per cent available to the open market, while sites of 10 units or fewer have no restrictions.
 - **Scenario 3:** 50 per cent of dwellings affordable, 50 per cent open market.
 - **Scenario 4:** 15 per cent of dwellings affordable, 15 per cent local occupancy, 70 per cent open market.
- 4.58 For Scenarios 3 and 4, small sites (i.e. those in the east of the District that are capable of accommodating up to four units, and in the west, sites that can accommodate up to

10 units) have been assessed as per Scenarios 1 and 2, where fewer restrictions would apply.

5 HOUSING COMMITMENTS, DEMOLITIONS, AND UNDER- OR OVER-SUPPLY AGAINST RSS TARGETS SINCE THE RSS BASE DATE

Housing Commitments

What Are Housing Commitments?

- 5.1 Housing 'commitments' comprise dwellings with full or outline planning permission. The Council has supplied a schedule of commitments at the study base date (1 April 2008) for assessing housing land availability in the present study. It is reasonable to assume that not all of the commitments in the schedule will be implemented and so we consider that there is a need to apply a non-implementation rate (any failure of specific commitments to be taken up can be dealt with through routine monitoring and supply management). We return to this issue, below.
- 5.2 Because the latest comprehensive data on residential commitments supplied by the Council relate to a base date of 1 April 2008, it should be noted that some of the residential planning permissions at the study's base date may be partly or fully completed. This is unavoidable, however, and can be dealt with when the study is updated.
- 5.3 A number of housing allocations in the adopted Local Plan had not yet been implemented at the study base date, and potential from these sources has therefore been reassessed as part of this study, but only if they are within (or straddle) one of the 52 study area settlements where we conducted our search for sites and if they were yet to receive planning permission at the base date (in which case they would be covered by our analysis of commitments, as detailed below).

Planning Permissions that are Due to Expire in the Near Future

- 5.4 In consultation with Council Officers, it was agreed that we would not treat as commitments any sites which have a planning permission for residential use where the permission is due to expire in the near future but development has not started. For the purposes of our assessment it was decided that sites with permission due to expire by 31 March 2009 would be removed from the list of commitments. There were only a handful of such sites, which we stripped out of the commitments schedule. These sites have been included in the database, and have been assessed in the same way as sites that do not have planning permission for housing. We have, however, assumed a theoretical housing yield based on the number of dwellings that have been permitted.

Commitments at the Study Base Date

- 5.5 Information provided by the Council shows that at the study base date of 1 April 2008, there were 1,153 dwellings with extant planning permission across the District. This figure consists of 720 dwellings that had not been started, and 433 dwellings that were under construction but not yet complete.
- 5.6 We assume that in such cases the number of dwellings built will be as given in the latest permission, although it is possible that these will be superseded by further approvals on the same sites.

Allowance for Non-Implementation

- 5.7 It is reasonable to assume that not all of the residential commitments will be implemented, particularly given the current downturn in the market. In order to ensure a robust approach, we therefore consider that there is a need to make an allowance for non-implementation of a proportion of the planning permissions.

Applying a 'non-implementation rate' will ensure that the District's housing supply is not over-reliant on extant planning permissions, which may not all progress in practice. It was agreed with the Council that the application of a 20 per cent non-implementation rate would be an appropriate approximation for the purposes of the study.

- 5.8 We have thus applied a 20 per cent non-implementation rate to the total outstanding housing supply (where development has not yet commenced on site). Table 5.1 shows that, after applying the non-implementation rate, the total realistic housing supply at 1 April 2008 from residential commitments in the District is 922 dwellings.

Table 5.1 Summary of Total Supply at 1 April 2008 - Taking into Account a Non-Implementation Rate (20 per cent)

No. of Dwgs Not Yet Started	No. of Dwgs Under Construction but Not Completed	No. of Dwgs Still to be Built at the Base Date	No. of Dwgs Likely to be Built (assuming a 20% non-implementation rate)
720	433	1,153	922

Demolitions

- 5.9 The Council advised that the number of demolitions in the District each year is negligible, and that virtually all demolitions are subsequently replaced by new dwellings. Given this position, we do not consider it necessary to make an allowance for dwelling clearance in this study.

Consideration of Under- or Over-Provision Against the RSS Targets Since the Base Date of the RSS

- 5.10 As well as demolitions, there is also a need to take account of any under-provision against the RSS targets since the base date of the RSS. This is because paragraph 5. i) of the CLG's advice note entitled 'Demonstrating a 5 Year Supply of Deliverable Sites' (12 April 2007) states that in order to identify the level of housing provision to be delivered over the following 5 years, LPAs should use provision figures in adopted development plans, '*adjusted to reflect the level of housing that has already been delivered*'.
- 5.11 As Table 5.2 shows, the 1,156 net dwelling completions between the base date of the RSS and the SHLAA base date represents a shortfall of 844 dwellings vis-à-vis the five-year requirement of 2,000 dwellings net (based on the annual target of 400 dwellings prescribed by the RSS).

Table 5.2 Under-provision vis-à-vis RSS Dwelling Targets Arising Between the Base Date of the RSS (2003) and the SHLAA Study Base Date (1 April 2008)

Year ^a	Net Dwg Completions	Shortfall Against the RSS's Dwgs/yr Target (400 Dwgs Average)
2003-04	227	-173
2004-05	232	-168
2005-06	303	-97
2006-07	238	-162
2007-08	156	-244
Totals	1,156	-844

^a For each year, the completions data relate to the period 1 April to 31 March

- 5.12 Given that the identified shortfall is fairly significant, and bearing in mind prevailing market conditions, we do not consider it appropriate - or realistic - to apportion the shortfall of 844 dwellings to either the first five-year period, nor spread the shortfall equally across each of the three five-year study periods. Thus, we have apportioned the 844 dwellings as follows:
- 20 per cent of the dwelling shortfall in the first 5-year period (equating to 168 of the 844 shortfall);
 - 40 per cent of the dwelling shortfall in the second 5-year period (equating to 338 of the 844 shortfall); and
 - 40 per cent of the dwelling shortfall in the third 5-year period (equating to 338 of the 844 shortfall).
- 5.13 The resultant 5, 10 and 15-year dwelling requirements, based on the figures contained in the RSS and the shortfall of 844 dwellings that occurred between 2003 and 2008, are set out in Table 5.3.

Table 5.3 South Lakeland 5, 10 and 15-Year Dwelling Requirements Based on Approved RSS Targets, Adjusted to Reflect Under-Provision Since 2003

First 5 Years			
Dwelling Requirement (2008-2013)	Allowance for Under-Provision Since 2003	Total Dwelling Requirement for First 5-Years	5-Year Dwelling Target
2,000	168	2,168	2,168
Second 5 Years			
Dwelling Requirement (2013-2018)	Allowance for Under-Provision Since 2003	Total Dwelling Requirement for Second 5-Years	10-Year Dwelling Target
2,000	338	2,338	4,506
Third 5 Years			
Dwelling Requirement (2018-2023)	Allowance for Under-Provision Since 2003	Total Dwelling Requirement for Third 5-Years	15-Year Dwelling Target
2,000	338	2,338	6,844

- 5.14 The figures contained in the third column of Table 5.3 above are those that we work to in Sections 6 and 7 of our report, when assessing the level of contribution towards the Council's dwelling targets from sites within (and in some cases immediately adjacent to) existing settlement boundaries.

6 HOUSING YIELD ASSESSMENT

Approach to Identified Sites

- 6.1 The assessment of housing potential from the sites identified in the database combines the calculation of theoretical dwelling yields for individual sites with the categorisation of those sites in terms of their likelihood of coming forward for development.
- 6.2 The database has been carefully checked to ensure it does not include any site duplication. As explained in Section 4 of our report, the database does not contain sites which have planning permission for residential development, apart from a small number of sites with permission for housing which is due to lapse by 31 March 2009. Planning permissions therefore do not contribute to the housing yield total provided by the database, as all residential commitment sites are dealt with separately in the assessment (see Section 5 of our report for details).
- 6.3 All of the sites in the database are theoretically suitable for residential development, because we filtered out unsuitable sites early in the study. Some of them are nevertheless subject to significant constraints which might restrict their likelihood of being brought forward as application sites, the likelihood of them being approved and the likelihood of them achieving their fully assessed capacity (yield) if they were to be approved. These factors will also affect whether it would be appropriate to allocate them in the LDF.
- 6.4 We subjected all of the sites in the database to a comprehensive GIS-based site assessment, as detailed in Section 4 of our report, scoring each site against 10 assessment criteria in order to derive an initial overall score (out of 50) for each site. The 10 assessment criteria measures are closely related to the 'suitability', 'availability' and 'achievability' criteria referred to on pages 16 and 17 of the Practice Guidance, and they reflect local circumstances²². Our GIS-based site assessment thus provides a good indication of each site's performance against a broad number of important measures, and forms the first step in our site categorisation exercise.
- 6.5 Sites which obtain a score of 41 out of 50 or above in the initial assessment clearly perform well and are affected by the fewest constraints (scoring 0 or 1 in no more than one of the assessment criteria). Accordingly, we initially placed these sites into Category 1 ('deliverable' sites). Sites achieving overall scores of between 35 and 41 out of 50 perform moderately well against the assessment criteria, facing more significant constraints than the best-scoring sites but which still appear to be achievable/deliverable, and so we initially rated these sites as Category 2 ('developable' sites). Sites achieving low overall scores, of below 35 out of 50, perform least well against the assessment criteria, facing at least three significant constraints; therefore, in our initial categorisation exercise, these sites were placed into Category 3 ('least developable' sites)²³.
- 6.6 As we explained in Section 4, although the GIS-based site assessment provides a good indication of each site's performance against a broad number of important measures, it is still necessary to undertake a supplementary assessment of the sites to ensure that certain 'core' constraints are fully taken into account.
- 6.7 Thus, we ordered the various core constraints - relating to bad neighbours, nature conservation, achievability and flood risk - and considered which are most easily overcome and which are more likely to prevent a site from coming forward. In the case

²² For instance, we have considered Flood Risk Zones, nature conservation and bad neighbours, whereas for this study there has been no need to take account of Green Belt.

²³ These definitions match those specified in paragraphs 54 and 55 of PPS3, which are carried through into paragraphs 5 and 33 of the SHLAA Practice Guidance.

of the latter, this is not to say that the constraint could not be overcome, rather that it is likely to delay the site coming forward until such time as it is possible, or worthwhile, to overcome the constraint.

- 6.8 Our approach to site categorisation is set out in the table at the rear of the Site Assessment Criteria Note, which is presented in Appendix 3. Each site was placed initially into Category 1, 2 or 3 on the basis of its overall performance in the GIS-based site assessment. However, if a site is affected by additional constraints of the types listed in the table at the rear of Appendix 3, these will tend to downgrade its categorisation as indicated. The overall categorisation of a site therefore depends on the particular combination of constraints affecting it.
- 6.9 Under the heading 'Reason for Categorisation', Part 1 of the database provides a summary of the reasons explaining why each site has been assigned to a particular Category band. Thus, it is immediately apparent from looking at the database whether a site is affected by particular constraints and, hence, what sort of intervention will be required in order to make the sites deliverable.
- 6.10 We have reflected the clear sequential approach in PPS25 in our categorisation of sites. Flood Risk Zones 1 and 2 are both acceptable locations for housing²⁴ but under the sequential approach, Zone 1 is preferable to Zone 2. Accordingly, we have placed Flood Zone 1 sites into Category 1 and Flood Zone 2 sites into Category 2. A Strategic Flood Risk Assessment (SFRA) has been undertaken across the District, and from the study's data we are able to distinguish between Flood Risk Zone 3a (where development can be acceptable, provided a PPS25 'Exception Test' is passed) and Zone 3b ('the Functional Floodplain', which is not suitable for housing). Thus, any sites within Flood Zone 3b were automatically excluded from the study on that basis. Housing development can be acceptable in Flood Zone 3a, provided a PPS25 'Exception Test' is passed. Nevertheless, under the PPS25 sequential approach, Flood Zone 3a sites are the least preferred location for housing development and so we have given a Category 3 rating to any sites which are deemed to be within Flood Zone 3a, even if they are not subject to any other constraints.
- 6.11 PPS3 gives clear priority to housing on PDL rather than on greenfield sites²⁵. However, greenfield and brownfield development can be regarded as complementary and the contribution of both will be required in order to meet projected demand in the long-term. We have therefore not made PDL/greenfield status a criterion for categorising sites, but have separately identified the theoretical dwelling yield from each land type to allow us to examine their respective roles in meeting overall housing requirements.
- 6.12 We also considered bad neighbour constraints in our categorisation exercise. Whilst these constraints are unlikely to prevent a site coming forward for development, they nevertheless require mitigation, which may affect the availability of a site for residential development. Sites facing bad neighbour constraints have thus been downgraded to Category 2 or 3, depending on the degree of constraint.
- 6.13 It is important to emphasise that for a site to achieve a Category 1 rating, it would need to be suitable, and available (or capable of being made available) within 5 years, and achievable.
- 6.14 The placing of a site into Category band 1, 2 or 3 is intended to give a useful indication of the deliverability and potential timing of a site's development and, hence, its suitability for inclusion as an allocation in the LDF. Sites in Category 1 have minimal constraints - which can relate to policy restrictions on the site's location, physical difficulties, availability, and/or achievability - are considered to be deliverable within the first five years. These sites are clear candidates for allocation. Sites in Category 2

²⁴ See Table D.3 of PPS25.

²⁵ See para 36 of PPS3.

have a limited level of constraints such that they are likely to be available for delivery after the first five years. These 'developable' sites may be suitable for allocation, depending on their individual circumstances and on specific measures being proposed to overcome their constraints. Sites in Category 3 ('least developable') have more significant constraints; for these sites to be considered appropriate for development or for allocation it would have to be clearly demonstrated that the significant constraints could be overcome in order to make them deliverable.

- 6.15 The inclusion of a site in a higher Category band should not be taken to represent a recommendation that it should be allocated in the LDF, as our categorisation process does not take account of all the policy considerations that are relevant in selecting sites for allocation. Equally, it should not be concluded that a site assigned to a lower Category band cannot come forward, or that it cannot be allocated for development. Rather, it would need to be demonstrated that the site's constraints could be overcome in order to secure its deliverability.

Assessment of Whether There is a Need to Make a Small Site Allowance

- 6.16 Paragraph 54 of the SHLAA preparation guidance - published by the PAS in July 2008 - refers to footnote 31 on page 19 of PPS3, which states that *'Windfall sites are those which have not been specifically identified as available in the local plan process. They comprise previously-developed sites that have unexpectedly become available. These could include, for example, a factory closure or small sites such as a residential conversion or a new flat over a shop'* (our emphasis).
- 6.17 Where there is evidence of a high and consistent proportion of new dwellings generated on small sites that were not expected to come forward for development, there is a strong case for adopting a small site allowance as an element of the total housing requirement for the District. There is a clearly recognised risk that, if unexpected developments on small sites (including, for instance, subdivisions of large houses or development in gardens) - which are likely to occur, regardless of how thorough the SHLAA is - are not taken into account, then this could lead to over-allocation of greenfield land, which would be counter to PPS3. Where possible, the small site allowance should exclude greenfield developments; this is not to imply that greenfield developments will not be permitted on small sites, but they should not be assumed in assessing the capacity to meet dwelling targets.
- 6.18 Although we have taken a comprehensive approach to site identification, and have not used a site size threshold for the purpose of this study, we considered that it was justifiable to apply a reasonable small site allowance. This approach will enhance the robustness of the study by taking into account potential unexpected development which by definition would not be covered as part of the SHLAA site assessment, such as conversions, changes of use, and small infill schemes (such as development of gardens). As such, we have assessed the level of production on PDL sites that are capable of accommodating 5 or fewer dwellings (based on data supplied by the Council). The completions record used to assess past rates of housing development on small sites covers the five-year period April 2003 to March 2008. This is long enough not to be unduly affected by unusual circumstances in particular years, but does not stretch back into the period before the current planning and housing density provisions were introduced in PPG3 in 2000.
- 6.19 Table 6.1 sets out the total and annual average completions on small PDL sites between 2003 and 2008. The table shows that, across the District as a whole, 476 dwellings were completed on these PDL sites over the five-year period, which equates to an average of 95 dwellings per annum (dpa). The number of completions from residential conversions has increased significantly over the five-year period, whereas there has been a steep decline in the number of dwellings coming forward from a change of use from non-residential. The overall supply from small PDL sites has

remained relatively static, however, indicating that this potential source is not yet close to depletion.

Table 6.1 Five-Year Completions on Small PDL Sites, South Lakeland District

Development Category	Dwelling Completions					TOTAL
	2003-04	2004-05	2005-06	2006-07	2007-08	
Residential Conversion	7	14	34	32	48	135
Change of Use from Non-Residential	67	43	33	36	20	199
Redevelopment of Residential	0	2	3	4	4	13
New Build (Infill)	19	22	33	30	25	129
TOTAL	93	81	103	102	97	476

- 6.20 The average over the past six years of 95 dpa is significant and provides firm justification for making a small site allowance. Nevertheless, paragraph 54 of PPS3 states that the supply for the first five years should be based on ‘*specific deliverable sites*’. Accordingly, we have not made a small site allowance for the first 5-year period.
- 6.21 In consultation with the Council, it was agreed that we would make a small site allowance for the subsequent 5-year periods. The use of small site allowances in the second and third 5-year study periods will help to ensure that the SHLAA is as realistic and robust as possible.
- 6.22 The five-year average annual completion rate in Table 6.1 would translate to 5-, 10- and 15-year small site allowances of 475, 950 and 1,425 dwellings, respectively. However, given the current downturn with the housing market, we consider that it is sensible to apply a more cautious small site allowance. Accordingly, we have adopted the following small site allowances, which we derived by halving the allowances based on the five-year average annual completion rate:
- small site allowance for second five-year period: 238 dwellings (labelled in subsequent sections of our report as ‘SS1’); and
 - small site allowance for third five-year period: 238 dwellings (‘SS2’).
- 6.23 It may be noted that part of the small site supply in the early years might already be committed in outstanding planning permissions. This is because the supply figures from existing permissions contained in Table 5.1 - which we use in subsequent sections of our report - relate to permissions on all sites (i.e. no site size threshold was applied), and so there may be a small possibility of double-counting with the small site allowance. Nevertheless, we consider that by taking a cautious approach through halving the five-year average annual number of completions on small sites, we have minimised the risk of this occurring.

Site Yield by Category Band - Four ‘Achievability’ Scenarios

- 6.24 As we explained in Section 4, ‘achievability’ has been assessed under four different scenarios. The resultant yields within each Category band are set out in the tables below; the tables suffixed ‘a’ illustrate, the number of sites in each Category band and their potential combined yield. Sites within each Category band are further classified (suffixed ‘b’ in the tables) according to their gross site area into those below and those above 10 ha. This is because the database includes some large sites where a decision to allocate or approve development would have to be based on wider policy considerations than is the case with smaller sites. These considerations are likely to include the broad sustainability of the total development pattern, and strategic transport and other infrastructure capacity. Before such large sites could be proposed for allocation they would also require careful attention to their size, capacity and boundaries, which would be beyond the remit of this strategic study.

Scenario 1

- 6.25 Table 6.1a shows that under Scenario 1, Category 1 sites offer a potential yield of only around 450 dwellings, split fairly evenly between greenfield and PDL sites. Category 2 sites offer a yield of 225 dwellings, most of which is on greenfield land. The bulk of the supply in this scenario comes from Category 3 sites: approximately 9,000 dwellings, of which only around 20 per cent is on PDL.

Table 6.1a Summary Yield Schedule from Categorized Sites, Scenario 1

	TOTAL YIELD	Dwelling Yield From PDL Sites			Dwelling Yield From GF Sites		
		Sites up to 10ha Gross	Sites Over 10ha Gross	Total	Sites up to 10ha Gross	Sites Over 10ha Gross	Total
Category 1	449	226	0	226	223	0	223
Category 2	225	40	0	40	185	0	185
Category 3	8,978	1,570	0	1,570	6,421	987	7,408
	9,652	1,836	0	1,836	6,829	987	7,816

- 6.26 Table 6.1b shows that of the 259 sites for which we identified a theoretical yield, three have a site area above 10 ha, offering a combined yield of just under 1,000 dwellings. All of these large sites are greenfield and are in Category 3.

Table 6.1b Detailed Yield Schedule from Categorized Sites, Scenario 1

Category	Site area	Total		PDL		GF	
		Dwgs	No. Sites	Dwgs	No. Sites	Dwgs	No. Sites
1a	< 10 ha	449	60	226	37	223	23
1b	> 10 ha	0	0	0	0	0	0
2a	< 10 ha	225	13	40	7	185	6
2b	> 10 ha	0	0	0	0	0	0
3a	< 10 ha	7,991	183	1,570	47	6,421	136
3b	> 10 ha	987	3	0	0	987	3
TOTALS		9,652	259	1,836	91	7,816	168

Scenario 2

- 6.27 Table 6.2a shows that under Scenario 2, Category 1 sites offer a potential yield of around 2,100 dwellings, almost three quarters of which is from greenfield sites. Category 2 sites also offer a higher theoretical yield under Scenario 2, of around 2,200 dwellings, again mostly from greenfield land. The potential supply from Category 3 sites under Scenario 2 is about 5,400 dwellings.

Table 6.2a Summary Yield Schedule from Categorized Sites, Scenario 2

	TOTAL YIELD	Dwelling Yield From PDL Sites			Dwelling Yield From GF Sites		
		Sites up to 10ha Gross	Sites Over 10ha Gross	Total	Sites up to 10ha Gross	Sites Over 10ha Gross	Total
Category 1	2,101	418	0	418	1,530	153	1,683
Category 2	2,174	260	0	260	1,914	0	1,914
Category 3	5,377	1,158	0	1,158	3,385	834	4,219
	9,652	1,836	0	1,836	6,829	987	7,816

- 6.28 Table 6.2b shows that under Scenario 2, one of the large sites, with a theoretical yield of approximately 150 dwellings, has moved from Category 3 to Category 1. The other two large sites remain within Category 3, and could collectively deliver in the region of 830 dwellings.

Table 6.2b Detailed Yield Schedule from Categorised Sites, Scenario 2

Category	Site area	Total		PDL		GF	
		Dwgs	No. Sites	Dwgs	No. Sites	Dwgs	No. Sites
1a	< 10 ha	1,948	96	418	47	1,530	49
1b	> 10 ha	153	1	0	0	153	1
2a	< 10 ha	2,174	53	260	14	1,914	39
2b	> 10 ha	0	0	0	0	0	0
3a	< 10 ha	4,543	107	1,158	30	3,385	77
3b	> 10 ha	834	2	0	0	834	2
TOTALS		9,652	259	1,836	91	7,816	168

Scenario 3

- 6.29 Under Scenario 3, Category 1 sites offer a potential yield of around 4,000 dwellings, as shown by Table 6.3a. This is almost double the Category 1 yield under Scenario 2, and more than eight times the potential yield of Category 1 sites under Scenario 1. Category 2 sites also offer a considerably greater yield of around 3,400 dwellings, the majority of which is on greenfield land. Under Scenario 3, Category 3 sites offer potential for just over 2,200 dwellings, of which around one third is on PDL.

Table 6.3a Summary Yield Schedule from Categorised Sites, Scenario 3

	TOTAL YIELD	Dwelling Yield From PDL Sites			Dwelling Yield From GF Sites		
		Sites up to 10ha Gross	Sites Over 10ha Gross	Total	Sites up to 10ha Gross	Sites Over 10ha Gross	Total
Category 1	4,019	541	0	541	3,325	153	3,478
Category 2	3,431	522	0	522	2,396	513	2,909
Category 3	2,202	773	0	773	1,108	321	1,429
9,652		1,836	0	1,836	6,829	987	7,816

- 6.30 Table 6.3b shows that under Scenario 3, there is one large site in each of the three Category bands.

Table 6.3b Detailed Yield Schedule from Categorised Sites, Scenario 3

Category	Site area	Total		PDL		GF	
		Dwgs	No. Sites	Dwgs	No. Sites	Dwgs	No. Sites
1a	< 10 ha	3,866	145	541	58	3,325	87
1b	> 10 ha	153	1	0	0	153	1
2a	< 10 ha	2,918	60	522	17	2,396	43
2b	> 10 ha	513	1	0	0	513	1
3a	< 10 ha	1,881	51	773	16	1,108	35
3b	> 10 ha	321	1	0	0	321	1
TOTALS		9,652	259	1,836	91	7,816	168

Scenario 4

- 6.31 Table 6.4a shows that under Scenario 4, the potential number of dwellings that could be delivered from Category 1 sites - at approximately 4,300 - is more than nine times that of the Category 1 yield under Scenario 1, illustrating the considerable impact that the varying scenarios of affordable housing requirements have on deliverability. Category 2 sites under Scenario 4 offer a theoretical yield of around 3,200 dwellings, which is over 14 times the number of dwellings that could be delivered by Category 2 sites under Scenario 1. As with Category 1 sites, the vast majority of dwellings from Category 2 would be on greenfield sites. Category 3 sites collectively offer potential for about 2,100 dwellings under Scenario 4, around one third of which are on PDL.

Table 6.4a Summary Yield Schedule from Categorised Sites, Scenario 4

	TOTAL YIELD	Dwelling Yield From PDL Sites			Dwelling Yield From GF Sites		
		Sites up to 10ha Gross	Sites Over 10ha Gross	Total	Sites up to 10ha Gross	Sites Over 10ha Gross	Total
Category 1	4,288	757	0	757	3,378	153	3,531
Category 2	3,240	352	0	352	2,375	513	2,888
Category 3	2,124	727	0	727	1,076	321	1,397
	9,652	1,836	0	1,836	6,829	987	7,816

- 6.32 The distribution of large sites across the 'Category Bands' under Scenario 4 is the same as that for Scenario 3, as shown in Table 6.4b below.

Table 6.4b Detailed Yield Schedule from Categorised Sites, Scenario 4

Category	Site area	Total		PDL		GF	
		Dwgs	No. Sites	Dwgs	No. Sites	Dwgs	No. Sites
1a	< 10 ha	4,135	158	757	66	3,378	92
1b	> 10 ha	153	1	0	0	153	1
2a	< 10 ha	2,727	53	352	13	2,375	40
2b	> 10 ha	513	1	0	0	513	1
3a	< 10 ha	1,803	45	727	12	1,076	33
3b	> 10 ha	321	1	0	0	321	1
TOTALS		9,652	259	1,836	91	7,816	168

Categorisation Schedules and Plans

- 6.33 Categorisation schedules are set out in Appendices 4, 5 and 6, which for each of the four scenarios identify the Category rating (1, 2 or 3) for all 259 of the sites with a theoretical yield, and also provide for each site: brief address details; the gross site area; and the theoretical housing yield (after allowance has been made for any site-specific physical constraints).
- 6.34 The plans in Appendix 7 show, in schematic terms, the spatial distribution of Category 1, Category 2 and Category 3 sites across the District. The first plan shows that across the study area, most of the sites that we assessed have been rated as Category 3 under Scenario 1, (these sites are shown in red). The second plans that under Scenario 2, whilst many of the sites are still rated as Category 3, the effect of relaxing the affordability requirements is to improve the achievability of a significant proportion of the sites. The final two plans show that majority of sites now fall within Category bands 1 and 2 under the more relaxed Scenarios 3 and 4.

Summary

- 6.35 Our work shows that:
- Under Scenario 1 ('50 per cent affordable and 50 per cent local occupancy'), 60 of the 259 sites with a theoretical yield are rated as Category 1. These sites account for just under 5 per cent of the total dwelling yield (that is, 449 out of 9,652 dwellings) - mostly from very small sites. In contrast, 93 per cent of the yield under Scenario 1 is from the 186 sites that we placed within Category 3.
 - Under Scenario 2 ('50 per cent affordable; 30 per cent local occupancy; 20 per cent open market'), the yield from the 97 Category 1 sites improves to about 22 per cent of the total theoretical supply, whereas the theoretical dwelling contribution from the 109 Category 3 sites reduces to around 57 per cent.
 - Under Scenario 3 ('50 per cent affordable, 50 per cent open market'), there is a marked improvement in the supply from sites that are rated as Category 1, which

account for 146 of the 259 sites and approximately 42 per cent of the total theoretical yield of 9,652 dwellings. The 52 sites that are rated as Category 3 under this scenario account for about 23 per cent of the total supply.

- Under Scenario 4 ('30 per cent affordable, 70 per cent open market'), the theoretical supply from the 159 sites that are rated as Category 1 improves further, to around 44 per cent, whereas the 46 Category 3 sites account for just 22 per cent of the overall theoretical yield of 9,652 dwellings.

6.36 Our sensitivity testing illustrates the significant effect that alternative requirements for affordable housing and local occupancy have on achievability. In Section 7, we show how the potential from the sites could contribute to housing supply over the next 15 years under each of the four Scenarios.

7 TOTAL HOUSING YIELD AND SITE CATEGORISATION

Introduction

- 7.1 In this section, we identify the theoretical dwelling potential from sites within (and in some cases straddling or immediately adjacent to) existing settlement boundaries, and assess their contribution to the District's dwelling targets over the next 15 years. This is summarised in Tables 7.1 to 7.4. It is important to reiterate that in addition to the SHLAA, the separate Employment and Housing Land Search Study is considering sites located outside settlement boundaries. Therefore, for the avoidance of doubt, the figures in our report relate only to sites that we have considered in the SHLAA study.
- 7.2 The elements of potential comprise:
- i) sites with planning permission;
 - ii) the small site allowance for the second and third 5-year periods, as explained in Section 6; and
 - iii) sites identified in this assessment as potentially suitable for housing.
- 7.3 Of the identified sites in (iii) above, those in Category 3 should be considered to represent real potential only when it has been demonstrated that the significant constraints affecting these sites - which could relate to physical, availability or achievability factors, or a combination thereof - can be mitigated or overcome to make them developable.

Contribution to the District's Dwelling Targets from SHLAA Sites

Approach

- 7.4 We have assessed the contribution to the District's dwelling targets from the sites that we have assessed, for each of the three five-year periods from April 2008, under each of the four 'achievability' scenarios discussed in Section 4. As we explained in Section 5, we have adjusted the dwelling targets to reflect the under-supply of 844 dwellings since the base date of the adopted RSS (1 April 2003), and this is taken into account in Tables 7.1 to 7.4 below.
- 7.5 The components of potential are also set out in Tables 7.1 to 7.4, and are referenced as follows:
- PP = dwellings with outstanding planning permission at the study base date of 1 April 2008 which were still to be completed²⁶;
 - SS = small site allowance (as defined in Section 6), numbered SS1 for the second five-year period and SS2 for the third 5-year period; and
 - C1, C2, C3 = potential of sites in Category bands 1, 2 and 3 respectively, suffixed 'a' for sites with a gross area of up to 10 ha, or 'b' for sites over 10 ha gross.
- 7.6 Tables 7.1 to 7.4 set out the build-up of the housing potential from the sites assessed as part of this study, over the 5-, 10-, and 15- year study periods. Within each period, the yield from a combination of components is compared with the

²⁶ As we explained in Section 5, we have applied a non-implementation rate of 20 per cent to the total outstanding housing supply (where development has not yet commenced on site).

dwelling target for the period. Where a combination is sufficient to meet the target, the yield and the number of additional identified sites which make up the yield is highlighted in green. Otherwise the yield and number of sites are left without colour. It is therefore immediately apparent to what extent the potential housing supply for a period is sufficient to meet the target.

- 7.7 The approach described above is adopted for both the total yield and the yield on PDL. It should be noted, however, that the yields for the latter include dwellings from planning permissions on greenfield as well as PDL sites. In treating PDL separately from greenfield yield, it is immediately apparent from the table whether and to what extent it is likely to be necessary to call on additional greenfield land to meet the RSS target, which is important because maximising the use of PDL is a key policy aim of PPS3.
- 7.8 It is important to reiterate that the remit of this study is to assess sites within, and in some cases immediately adjacent to, existing settlement boundaries; a separate study has been undertaken in parallel to this SHLAA in order to assess the potential dwelling contribution from sites outside of the existing urban area²⁷. As such, this SHLAA cannot by itself determine whether there is sufficient potential from suitable sites across the District as a whole to meet the RSS dwelling targets. Instead, the SHLAA study assesses the potential contribution from sites that are within or immediately adjacent to existing settlement boundaries only.
- 7.9 As we made clear in Section 6, our site categorisation does not take account of all the policy considerations that are relevant in selecting sites for allocation, which are likely to include the broad sustainability of the total development pattern, and strategic transport and other infrastructure capacity. Thus, we have not undertaken any analysis to consider whether the Category 1 supply indicated in Tables 7.1 to 7.4 is in the right place to meet strategic policy objectives. Similarly, we have not considered whether it would be better to remove the obstacles affecting Category 2 PDL and bring these sites forward in advance of Category 1 greenfield sites in order to limit encroachment into open countryside. These issues are beyond the scope of a SHLAA and will need to be considered through the LDF preparation process.

Yield Assessment

Scenario 1

- 7.10 Table 7.1 indicates that under Scenario 1, the number of dwellings with outstanding planning permission at the study base date (having made an allowance for non-implementation) is insufficient to meet the District's dwelling requirement for the first five years, of 2,168 net additional dwellings. Indeed, so severely does this scenario restrict the supply of deliverable sites that even if all Category 1 and Category 2 sites were included, the 5-year target could not be met. There would be a need to bring forward a small number of the highly constrained Category 3 sites, necessitating a significant element of work to make these sites deliverable.
- 7.11 It would be possible to meet the 5-year target without allocating any further greenfield sites, although again, it would be necessary to allocate a significant element of the highly constrained Category 3 sites.
- 7.12 There is a need to make provision for a further 2,338 dwellings to cover the 10-year period. Under this scenario, the 10-year target of 4,506 net additional dwellings can only be reached from sites within or adjacent to existing settlement boundaries when potential from all Category 1 and 2 sites is used, together with some Category 3 sites, which could collectively yield 9,652 dwellings (including extant planning permissions and the small site allowance for this period). The 10-year target cannot be met purely from PDL, even if all of the PDL sites that we rated as Category 1, 2

²⁷ The 'Employment and Housing Land Search Study'

and 3 are used, and therefore under Scenario 1 there will be a need to allocate some greenfield sites.

- 7.13 Allocations in the LDF need to be increased by a further 2,338 dwellings to cover the 15-year dwelling target. As with the 10-year target, under Scenario 1 there is only sufficient capacity from sites within or immediately adjacent to existing settlement boundaries if some of the more significantly constrained Category 3 sites are used. Again, there will be a need to allocate greenfield sites as the target cannot be met purely from PDL.

Table 7.1 Contribution of Cumulative Housing Potential under Scenario 1, Forthcoming 5-, 10-, and 15-year Periods

Period	Component	Total		PDL	
		Yield	Additional Sites (i)	Yield (ii)	Additional Sites (i)
First 5 years	PP	922	0	922	0
	PP+C1a	1,371	60	1,148	37
	PP+C1a+C1b	1,371	60	1,148	37
	PP+C1a+C2a	1,596	73	1,188	44
	PP+C1a+C1b+C2a	1,596	73	1,188	44
	PP+C1a+C1b+C2a+C2b	1,596	73	1,188	44
	PP+C1+C2+C3	10,574	259	2,758	91
	Dwelling Requirement (iii)	2,168		2,168	
First 10 years	PP	922	0	922	0
	SS1	238	0	238	0
	PP+SS1	1,160	0	1,160	0
	PP+SS1+C1a	1,609	60	1,386	37
	PP+SS1+C1a+C1b	1,609	60	1,386	37
	PP+SS1+C1a+C2a	1,834	73	1,426	44
	PP+SS1+C1a+C1b+C2a	1,834	73	1,426	44
	PP+SS1+C1a+C1b+C2a+C2b	1,834	73	1,426	44
	PP+SS1+C1+C2+C3	10,812	259	2,996	91
	Dwelling Requirement (iii)	4,506		4,506	
	First 15 years	PP	922	0	922
SS2		475	0	475	0
PP+SS2		1,397	0	1,397	0
PP+SS2+C1a		1,846	60	1,623	37
PP+SS2+C1a+C1b		1,846	60	1,623	37
PP+SS2+C1a+C2a		2,071	73	1,663	44
PP+SS2+C1a+C1b+C2a		2,071	73	1,663	44
PP+SS2+C1a+C1b+C2a+C2b		2,071	73	1,663	44
PP+SS2+C1+C2+C3		11,049	259	3,233	91
Dwelling Requirement (iii)		6,844		6,844	

Notes:

(i) "Additional" = sites additional to those with planning permission

(ii) PDL yield includes dwellings from planning permissions on greenfield land as well as PDL sites, as these greenfield sites will also contribute to the dwelling requirements even if all other future development were to be on PDL sites.

(iii) The 'Dwelling Requirement' figure incorporates an allowance for under-provision against the RSS requirements which arose between the base date of the RSS (1 April 2001) and the SHLAA study base date (1 April 2008) - please refer to Table 5.3 for further details.

'a' = sites with a gross area of up to 10 ha.

'b' = sites with a gross area over 10 ha.

Scenario 2

- 7.14 Table 7.2 shows that under Scenario 2, there is sufficient potential from the 96 Category 1a sites - which could yield 2,870 dwellings - to comfortably meet the first 5-year dwelling target. It follows that when the extant permissions are added, the theoretical supply increases further. The dwelling target for the first 5-year period can only be met purely from PDL if some of the more constrained Category 3 PDL sites are used.
- 7.15 To reach the 10-year target of 4,506 dwellings from sites within or immediately adjacent to existing settlement boundaries under Scenario 2, there is a need to use a combination of Category 1a and Category 2a sites. The 10-year target cannot be met purely from PDL, even if all of the Category 1, 2 and 3 PDL sites are used, and therefore a number of greenfield sites will be required.
- 7.16 There is only sufficient capacity to meet the 15-year target from sites within or immediately adjacent to existing settlement boundaries by using some sites from Category 3. Again, there will be a need to allocate greenfield sites as the target cannot be met purely from PDL.

Table 7.2 Contribution of Cumulative Housing Potential under Scenario 2, Forthcoming 5-, 10-, and 15-year Periods

Period	Component	Total		PDL	
		Yield	Additional Sites (i)	Yield (ii)	Additional Sites (i)
First 5 years	PP	922	0	922	0
	PP+C1a	2,870	96	1,340	47
	PP+C1a+C1b	3,023	97	1,340	47
	PP+C1a+C2a	5,044	149	1,600	61
	PP+C1a+C1b+C2a	5,197	150	1,600	61
	PP+C1a+C1b+C2a+C2b	5,197	150	1,600	61
	PP+C1+C2+C3	10,574	259	2,758	91
	Dwelling Requirement (iii)	2,168		2,168	
First 10 years	PP	922	0	922	0
	SS1	238	0	238	0
	PP+SS1	1,160	0	1,160	0
	PP+SS1+C1a	3,108	96	1,578	47
	PP+SS1+C1a+C1b	3,261	97	1,578	47
	PP+SS1+C1a+C2a	5,282	149	1,838	61
	PP+SS1+C1a+C1b+C2a	5,435	150	1,838	61
	PP+SS1+C1a+C1b+C2a+C2b	5,435	150	1,838	61
	PP+SS1+C1+C2+C3	10,812	259	2,996	91
	Dwelling Requirement (iii)	4,506		4,506	
First 15 years	PP	922	0	922	0
	SS2	475	0	475	0
	PP+SS2	1,397	0	1,397	0
	PP+SS2+C1a	3,345	96	1,815	47
	PP+SS2+C1a+C1b	3,498	97	1,815	47
	PP+SS2+C1a+C2a	5,519	149	2,075	61
	PP+SS2+C1a+C1b+C2a	5,672	150	2,075	61
	PP+SS2+C1a+C1b+C2a+C2b	5,672	150	2,075	61
	PP+SS2+C1+C2+C3	11,049	259	3,233	91
	Dwelling Requirement (iii)	6,844		6,844	

Notes:

(i) 'Additional' = sites additional to those with planning permission

(ii) PDL yield includes dwellings from planning permissions on greenfield land as well as PDL sites, as these greenfield sites will also contribute to the dwelling requirements even if all other future development were to be on PDL sites.

(iii) The 'Dwelling Requirement' figure incorporates an allowance for under-provision against the RSS requirements which arose between the base date of the RSS (1 April 2001) and the SHLAA study base date (1 April 2008) - please refer to Table 5.3 for further details.

'a' = sites with a gross area of up to 10 ha.

'b' = sites with a gross area over 10 ha.

Scenario 3

7.17 Table 7.3 indicates that it is possible to comfortably reach the 5-year target of 2,168 dwellings by using some of the large reservoir of sites that are rated as Category 1a under Scenario 3. Indeed, the target can be reached by drawing on the 145 Category 1a and 2a PDL sites, when considered together with planning permissions.

7.18 The dwelling target for the second five-year period can be met using some Category 1a sites. As in Scenarios 1 and 2, the target cannot be reached from PDL, even if

all of the 91 PDL sites across all Category bands (1,836 dwellings) are used. The same is therefore true for the third five-year period.

7.19 Table 7.3 shows that under Scenario 3, the 15-year dwelling target can be reached from a combination of the Category 1a and 2a sites.

Table 7.3 Contribution of Cumulative Housing Potential under Scenario 3, Forthcoming 5-, 10-, and 15-year Periods

Period	Component	Total		PDL	
		Yield	Additional Sites (i)	Yield (ii)	Additional Sites (i)
First 5 years	PP	922	0	922	0
	PP+C1a	4,788	145	1,463	58
	PP+C1a+C1b	4,941	146	1,463	58
	PP+C1a+C2a	7,706	205	1,985	75
	PP+C1a+C1b+C2a	7,859	206	1,985	75
	PP+C1a+C1b+C2a+C2b	8,372	207	1,985	75
	PP+C1+C2+C3	10,574	259	2,758	91
	Dwelling Requirement (iii)	2,168		2,168	
First 10 years	PP	922	0	922	0
	SS1	238	0	238	0
	PP+SS1	1,160	0	1,160	0
	PP+SS1+C1a	5,026	145	1,701	58
	PP+SS1+C1a+C1b	5,179	146	1,701	58
	PP+SS1+C1a+C2a	7,944	205	2,223	75
	PP+SS1+C1a+C1b+C2a	8,097	206	2,223	75
	PP+SS1+C1a+C1b+C2a+C2b	8,610	207	2,223	75
	PP+SS1+C1+C2+C3	10,812	259	2,996	91
	Dwelling Requirement (iii)	4,506		4,506	
First 15 years	PP	922	0	922	0
	SS2	475	0	475	0
	PP+SS2	1,397	0	1,397	0
	PP+SS2+C1a	5,263	145	1,938	58
	PP+SS2+C1a+C1b	5,416	146	1,938	58
	PP+SS2+C1a+C2a	8,181	205	2,460	75
	PP+SS2+C1a+C1b+C2a	8,334	206	2,460	75
	PP+SS2+C1a+C1b+C2a+C2b	8,847	207	2,460	75
	PP+SS2+C1+C2+C3	11,049	259	3,233	91
	Dwelling Requirement (iii)	6,844		6,844	

Notes:

(i) 'Additional' = sites additional to those with planning permission

(ii) PDL yield includes dwellings from planning permissions on greenfield land as well as PDL sites, as these greenfield sites will also contribute to the dwelling requirements even if all other future development were to be on PDL sites.

(iii) The 'Dwelling Requirement' figure incorporates an allowance for under-provision against the RSS requirements which arose between the base date of the RSS (1 April 2001) and the SHLAA study base date (1 April 2008) - please refer to Table 5.3 for further details.

'a' = sites with a gross area of up to 10 ha.

'b' = sites with a gross area over 10 ha.

Scenario 4

- 7.20 The District's dwelling target for the first five years under Scenario 4 easily be reached by using some of the 158 Category 1a sites within or immediately adjacent to settlement boundaries. Furthermore, the 5-year target can be reached purely from PDL, by using a combination of the 79 Category 1a and 2a PDL sites.
- 7.21 The 158 Category 1a sites are also sufficient to meet the dwelling target for the 10-year period. In this case, however, the target cannot be reached from PDL, even if the entire pool of 91 PDL sites across all Category bands - which together offer potential for 1,836 dwellings - is used. The same is therefore true for the third five-year period.
- 7.22 The District's 15-year dwelling target can easily be reached from a combination of Category 1a and 2a sites, when considered together with extant planning permissions and the small sites allowance.

Table 7.4 Contribution of Cumulative Housing Potential under Scenario 4, Forthcoming 5-, 10-, and 15-year Periods

Period	Component	Total		PDL	
		Yield	Additional Sites (i)	Yield (ii)	Additional Sites (i)
First 5 years	PP	922	0	922	0
	PP+C1a	5,057	158	1,679	66
	PP+C1a+C1b	5,210	159	1,679	66
	PP+C1a+C2a	7,784	211	2,031	79
	PP+C1a+C1b+C2a	7,937	212	2,031	79
	PP+C1a+C1b+C2a+C2b	8,450	213	2,031	79
	PP+C1+C2+C3	10,574	259	2,758	91
	Dwelling Requirement (iii)	2,168		2,168	
First 10 years	PP	922	0	922	0
	SS1	238	0	238	0
	PP+SS1	1,160	0	1,160	0
	PP+SS1+C1a	5,295	158	1,917	66
	PP+SS1+C1a+C1b	5,448	159	1,917	66
	PP+SS1+C1a+C2a	8,022	211	2,269	79
	PP+SS1+C1a+C1b+C2a	8,175	212	2,269	79
	PP+SS1+C1a+C1b+C2a+C2b	8,688	213	2,269	79
	PP+SS1+C1+C2+C3	10,812	259	2,996	91
	Dwelling Requirement (iii)	4,506		4,506	
First 15 years	PP	922	0	922	0
	SS2	475	0	475	0
	PP+SS2	1,397	0	1,397	0
	PP+SS2+C1a	5,532	158	2,154	66
	PP+SS2+C1a+C1b	5,685	159	2,154	66
	PP+SS2+C1a+C2a	8,259	211	2,506	79
	PP+SS2+C1a+C1b+C2a	8,412	212	2,506	79
	PP+SS2+C1a+C1b+C2a+C2b	8,925	213	2,506	79
	PP+SS2+C1+C2+C3	11,049	259	3,233	91
	Dwelling Requirement (iii)	6,844		6,844	

Notes:

(i) "Additional" = sites additional to those with planning permission

(ii) PDL yield includes dwellings from planning permissions on greenfield land as well as PDL sites, as these greenfield sites will also contribute to the dwelling requirements even if all other future development were to be on PDL sites.

(iii) The 'Dwelling Requirement' figure incorporates an allowance for under-provision against the RSS requirements which arose between the base date of the RSS (1 April 2001) and the SHLAA study base date (1 April 2008) - please refer to Table 5.3 for further details.

'a' = sites with a gross area of up to 10 ha.

'b' = sites with a gross area over 10 ha.

Summary

- 7.23 In this section we have identified the theoretical dwelling potential from sites within (and in some cases immediately adjacent to) existing settlement boundaries, and assessed their contribution to the District's dwelling targets over the next 15 years under each of the four 'achievability' scenarios discussed in Section 4.
- 7.24 Under the most stringent conditions of Scenario 1 ('50 per cent affordable and 50 per cent local occupancy'), the 5-year dwelling target can only be met by using all Category 1 and 2 sites together with some of the most significantly constrained (Category 3) sites. Similarly, the 10- and 15-year targets can only be reached by allocating some of the Category 3 sites. It is possible to meet the 5-year dwelling target without allocating any further greenfield sites, although again this is only possible by bringing in some of the most constrained Category 3 PDL sites. In the subsequent 10- and 15-year periods, the Council will need to allocate greenfield sites in order to reach the District's dwelling target.
- 7.25 Under the slightly less stringent Scenario 2 ('50 per cent affordable; 30 per cent local occupancy; 20 per cent open market), the dwelling target in the first 5-year period can be reached using some of the least constrained Category 1a sites, together with outstanding planning permissions, and it is possible to meet the 10-year target using a combination of Category 1a and 2a sites. The 15-year target can still only be met by relying on some of the most constrained Category 3 sites. Again, it is only possible to meet the 5-year target on PDL if some of the most constrained Category 3 PDL sites are used. For the 10- and 15-year periods, greenfield land will again need to be released for development.
- 7.26 Under Scenario 3 (50 per cent affordable, 50 per cent open market), there will still be a need to use some Category 1a sites in order to meet the 5-year dwelling target. However, it would be possible to meet the 5-year target wholly on PDL by allocating some of the less constrained Category 1a and 2a PDL sites. Furthermore, the 10-year dwelling target can now also be reached without the need for any Category 2 or 3 sites, and the 15-year target can be reached without having to use Category 3 sites. Some greenfield sites will need to be allocated to meet the 15-year target.
- 7.27 Under the more relaxed conditions of Scenario 4 (15 per cent affordable, 15 per cent local occupancy, 70 per cent open market), the 5-, 10- and 15-year targets can all be met using the same combination of sites as under Scenario 3. That is to say it is possible to meet the dwelling targets for the next 15 years using the less constrained Category 1a and 2a sites, when considered together with extant planning permissions and the small site allowance. However, greenfield sites will need to be allocated in the 10- and 15-year periods, as it will not be possible to meet the targets solely on PDL, even if all of the PDL sites across each of the Category Bands are used.