

The Council’s Approach to Delivering Housing Supply in Lancaster District

1. Introduction

1.1 The council has prepared additional evidence to support the examination of its Strategic Policies and Land Allocations document. This paper seeks to describe the council’s housing supply position as of the 31st December 2018, updating that from that previously submitted in May 2017. It sets out in detail the different components of its housing trajectory, and describes how on this basis the council propose to deliver housing to meet the district’s need.

2. Explaining the Housing Trajectory

2.1 As shown in the submitted Plan the trajectory continues to cover the period 2011/2012 to 2033/34. This continues to include an additional 3 years post adoption to ensure the requirement to plan for a 15 year supply is achieved.

2.2 The trajectory is divided into the following components:

Plan period	Plan period Year	Delivery
Pre-adoption	2011/12 – 2017/18	Historic completions
	2018/19	Projected completions
Years 1-5	2019/20 – 2023/24	Projected completions
Years 6-10	2024/25 – 2028/29	Projected completions
Years 11-15	2029/30 – 2030/31	Projected completions
	2031/32 – 2033/34	

Historic Completions

2.3 Historic completions are recorded in the trajectory. This confirms that between the 31st March 2011 and the 1st April 2018 **2,595** dwellings have been completed.

Table 1 – historic completions

Financial Year	Dwelling Completions (of which are student and other residential institution units)
2011/12	109 (10)
2012/13	235 (74)
2013/14	144 (3)
2014/15	473 (48)
2015/16	483 (24)
2016/17	628
2017/18	523 (27)
Running Total	2,595

- 2.4 Following a review of completions the council has made amendments to completions recorded for the 2011/12 and 2012/13 financial years. This has resulted in an additional 2 dwellings being included to the overall total.
- 2.5 Whilst not identified within this section of the trajectory the Council is aware of 184 dwelling completions between the 1st April 2018 and 31st December 2018. These are factored into the anticipated delivery data for the 2018/19 financial year.
- 2.6 Dwelling completions have been identified in line with advice contained within the Planning Practice Guide. This includes student housing and housing for older people.
- 2.7 Historic student completions have continued to be included on the basis of the councils past assessments. This is done on the basis of the equivalent dwelling units that would be achieved had development been brought forward as self-contained units. Each self-contained unit is counted as one dwelling. This has historically been recorded via an analysis of individual planning applications. A separate paper has been prepared detailing the council's approach to student housing delivery (appendix 1).

Projected Completions

- 2.8 Projected completions continue to be identified in two components:

- **Committed Supply**

- 2.9 The first section relates to committed supply as of December 2018 and is sub-divided by settlement.
- 2.10 As of the 1st December 2018 the outstanding commitment in the district stood at **1,963** (excluding student housing). Appendix 2 provides an updated position on delivery providing up to date information on the status of those sites included in the publication document as well as information on new sites approved and included in the supply since publication.

Large Sites

- 2.11 Sites above 10 dwellings are reported individually within the trajectory with detailed phasing reported. This has been prepared, where possible, in the context of the evidence provided by the relevant developers/agents for sites. This will be kept under review as part of the housing land monitoring process.
- 2.12 Where information has not been available Officers have made informed decisions on delivery taking account of the location of the site, known infrastructure requirements and potential constraints. An average build out rate of 30 dwellings per annum has generally been assumed. This is based on advice from the housing industry. It is also noted to be consistent with past trends which indicate an average annual built out rate on larger sites within the district of 33 dwellings per annum.
- 2.13 In the absence of specific information, the publication document used the lead in times detailed in the table below. These were prepared in consultation with the development industry during the preparation of the council's Strategic Housing and Employment Land Availability Assessment (SHELAA).

Site status	Less than 50 dwellings	More than 50 dwellings
Under construction	n/a	n/a
Full planning permission/Reserved Matters	1.5 years	2 years
Outline planning permission	2 years	2.5 years
Sites without planning permission	2.5 years	3 years

2.14 In updating the trajectory the council has applied the new definition of deliverability as defined in the 2018 NPPF in determining its five year supply position.

'Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years'.

2.15 Importantly it is not assumed that all sites with planning permission will be delivered or even built out within the plan period. This is acknowledged within the trajectory. With the exception of one site¹ only those sites with full approval have been included within the amended five year supply.

Unallocated large sites with approval	401
Allocated large sites with approval	1,126
TOTAL	1,527

Small sites

2.16 As of the 31st December 2018 there were 436 small sites with planning permission falling below the 10 dwelling threshold. 431 small sites were recorded in the publication trajectory.

2.17 Individual deliverability assessments have not been undertaken for these sites. The Council has instead sought to make an allowance for small site delivery within the trajectory based on past trends.

2.18 An analysis of delivery from small sites over the last 12 years is provided in table 2 below.

2.19 The table reports that on average over the last 12 years 81 dwellings per annum were completed and on average they made up 33% of the overall annual completion total. This figure is reduced to an average of 67 dwellings per annum when completions are considered for the Strategic Policies and Land Allocations Plan period only, 2011/12 onwards.

¹ LPSA_414 Warton Grange Farm, Warton – RM application is currently awaiting determination

Table 2 – Small site delivery

	Small site completions	% of overall completions
2006/07	113	62%
2007/08	185	53%
2008/09	133	40%
2009/10	37	20%
2010/11	33	42%
2011/12	50	51%
2012/13	56	26%
2013/14	61	42%
2014/15	125	26%
2015/16	29	6%
2016/17	87	14%
2017/18	59	11%
TOTAL	968	

- 2.18 On this basis the council has continued to make an expectation for 70 dwellings per annum from small sites within the trajectory. These are those sites of 10 dwellings or less. This figure will be kept under review via the Council’s annual monitoring process.
- 2.19 This figure is continued for 5 years only and importantly it does not exceed the 436 small site dwelling commitment total with only 350 dwellings projected to be delivered from this source.
- 2.20 To date 24 completions on small sites have been recorded between the 1st April 2018 and the 31st December 2018. In the absence of a full year of monitoring the Council has applied the above trend to the current monitoring period with a total of 70 dwelling completions anticipated, an additional 46 completions from that currently recorded.

Student housing

- 2.21 In line with government guidance and the inclusion of student housing within the council’s OAN an expectation of student delivery based on known approvals is included within the council’s future housing supply.
- 2.22 A separate note has been prepared in relation to student housing delivery (appendix 1). Appendix 1 describes the council’s position at publication stage and explains how this has evolved since, describing current and future student provision in the district and confirming how student housing is counted within the overall housing supply of the district.
- 2.23 Appendix 1 recognises that there has been considerable growth in student housing in the district over recent years with a rise in the number of purpose built accommodation being provided in the main city centre. Most providers are noted to be choosing to develop either cluster flats (which comprise study bedrooms grouped together in small flats with a shared kitchen/living room) or a studio flat, rather than traditional halls of residence.
- 2.22 As of the 1st December 2018 there was an outstanding commitment for 1,965 student bedrooms in the district, equivalent to 849 dwelling units.
- 2.24 Based on information from development management the trajectory identifies completion rates for student housing. Above average completion rates are anticipated during 2019/20 as

a number of large schemes are completed e.g. Luneside East, St. Leonards House and Bulk Road in Lancaster. The flatted nature of these applications mean that they are likely to be completed at the same time. After this it is anticipated that numbers would return to more normalised levels.

2.25 A total of 849 dwelling equivalent units are expected to be delivered from existing student housing approvals in the district.

2.26 Information on historic student completions is shown below.

Table 3 – Historic Student Completions

	Student completions
2011/12	10
2012/13	39
2013/14	3
2014/15	0
2015/16	24
2016/17	0
2017/18	27
TOTAL	103

2.27 With the exception of anticipated supply at Lancaster University, student completions in addition to those approved have not been projected within the trajectory.

- **Pending Decisions**

2.28 The amended trajectory includes information on 8 sites which whilst a positive decision has been made to grant permission as of the 1st December 2018 they remain subject to Section 106 Agreements and as such a decision notice has not been issued. No expectation for delivery from these sites is included within the five year housing land supply (Appendix 3).

- **Anticipated Supply**

2.28 Having concluded on committed delivery the trajectory moves onto identify projected housing delivery. This includes supply delivered through the following sources:

- Local Plan Allocations
- Arnsdale and Sliverdale AONB DPD sites
- Additional Supply

Local Plan Allocations

2.29 Informed by the recommendations contained within the SHELAA, the trajectory contains an expectation for the delivery of 3,079 dwellings via Local Plan allocations by 2030/31. These are sites that as of the 31st December 2018 did not benefit from planning permission.

2.30 Delivery expectations for allocated sites have been reviewed since the submitted plan. The review has taken account of new information as well as additional correspondence with agents and developers. Whilst in most instances the overall capacity of sites have not been amended the annual phasing and commencement dates have been revised to reflect what the council believes to be a more realistic expectation of delivery. This has led to a reduction in

the amount of development expected to be delivered within the plan period. The publication document had anticipated 4,377 completions from allocated sites by 2030/31.

2015 SHLAA Sites

- 2.31 The Publication document included an expectation for delivery from a number of sites identified as potential housing sites in the 2015 SHLAA. Whilst receiving positive consideration in the SHLAA the sites were not proposed for allocation within the Local Plan. A total of 65 dwellings were identified through this source. Three of these sites are now completed with 16 dwellings completed.
- 2.32 The Council are now in receipt of a new SHELAA for the district. Three of the sites, LPSA_156, LPSA_645 and LPSA_157, have been found to be undeliverable in the new assessment and as such no longer form part of the councils future housing land supply, these accounted for 19 dwellings.
- 2.33 Site LPSA_413 now benefits from planning permission and is included as part of the council's small site supply (4 dwellings).
- 2.34 Site LPSA_215 whilst continuing to be found deliverable within the SHELAA falls below the 10 dwelling threshold and as such is no longer listed individually within the trajectory (6 dwellings). Delivery from unapproved small sites is discussed further below.
- 2.35 The remaining site, site LPSA_290, is discussed further below.

2018 SHELAA

- 2.36 The publication document is based on the 2018 SHELAA. The SHELAA process is policy neutral. It makes decisions on the deliverability of sites based on a consideration of their suitability, availability and achievability for development. It leaves the policy judgements as to which sites should be allocated to the Local Plan process.
- 2.37 The Council recognise that there are a number of sites identified in the 2018 SHELAA as potential development sites but which have not been allocated for development in the Local Plan with an alternative designation being applied.
- 2.38 A paper detailing the justifications for this is provided in the 2018 SHELAA Report, appendix 4. For information, the main findings of this paper are detailed below, table 4.

Table 4 – Post SHELAA Site Assessment

LPSA	Site	Policy Justification for exclusion from the Local Plan
711	Greenbelt between Hest Bank and Slyne	Greenbelt
704	Land North of Manor Lane	Greenbelt
640	Land North of Hala ² Carr Farm	Local Landscape Designation

² The Council recognise that these two sites (LPSA 640 and LPSA 255) now benefit from planning permission for residential development. These were approved contrary to policy advice and whilst acknowledging their likely delivery the Council on the basis of its wider landscape evidence base have determined that the sites should not be allocated for residential development in the Local Plan with their continued protection on a landscape basis preferred. This will be kept under review through monitoring. The implication of this means that were

255	Land East of Bowerham Lane	Local Landscape Designation
712	Land West of Railway Line	Local Landscape Designation
537	Fair View, Slyne Road	Local Landscape Designation
371	Land North of Quernmore Road	Local Landscape Designation
256	Land at Barley Cop Lane, Lancaster	Local Landscape Designation
701	Land west of Gressingham Road, Hornby	Other Policy Considerations
793	Land adjacent to Scotland Road, Carnforth	Other Policy Considerations. Whilst not proposed for allocation the site now benefits from planning permission, subject to the signing of a S106 Agreement, and as such is included as part of the Councils housing supply.
678	Land East of Nether Kellet Road, Over Kellet	Other Policy Considerations

2.40 The 2018 SHELAA identifies three sites, LPSA_290 Derwent Court Salt Ayre Lancaster (15 dwellings), LPSA_676 Land South of Main Road Nether Kellet (15 dwellings) and LPSA_558 Land East of Chapel Lane, Overton (12 dwellings), as deliverable.

2.41 Site LPSA_290 relates to land in the grounds of an existing sheltered housing scheme. Whilst deliverable for housing this is likely to be as an extension to the existing sheltered housing scheme. Given the unique nature of this scheme it is not considered appropriate to include this site as part of the council's future housing land supply.

2.42 Site LPSA_558 Land East of Chapel Lane, Overton and LPSA_676 Land South of Main Road Nether Kellet are proposed new sites. Having reviewed the 2018 SHELAA Officers agree that these sites are developable and should the Inspector be minded to agree could be included as additional allocations within the Local Plan. For this reason these sites are included within the amended trajectory for the district with an expectation for 27 dwellings in total.

2019 SHELAA

2.43 In order to ensure a robust evidence base the Council has undertaken a further review of its SHELAA. The conclusions of this work have informed the delivery assessments included within the amended trajectory.

Arnsdale and Silverdale AONB

2.31 A separate Development Plan Document has been prepared for the Arnsdale and Silverdale AONB area. This includes two allocations within the village of Warton. Anticipated dwelling completions for these sites continue to be included within the trajectory. A total of 21 dwellings have been allocated and are expected to be delivered from this source. Whilst some

the approval for residential development to lapse new applications would be considered in the context of the Local Plan which as submitted would mean determining the applications against the Local Plan landscape designation.

amendments have been made to phasing, the overall capacity for the sites are expected to remain the same.

Student Housing Growth

2.32 The council has included an increased expectation of delivery from student housing as reported in the Lancaster University Masterplan and supporting documentation. This information confirms significant growth at the university campus and within the city itself as part of University expansion plans. In line with the governments definition for student housing (in the Housing Flow Reconciliation form and Housing Delivery Test Measurement Rule Book) the 2.5 bedroom to unit ratio has been applied to calculate equivalent dwelling units. This is explained further in Appendix 1.

- **Additional Supply**

2.33 Additional supply has also been identified through Neighbourhood Plans and potential additional windfall sites.

Neighbourhood Plans

2.34 The trajectory continues to include an expectation for development from a number of additional sources of supply. This includes an expectation of delivery from Neighbourhood Plan areas.

2.35 Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan and must plan positively on the basis of evidence, to meet development needs. The Council is working with Neighbourhood Plan groups to help them achieve Neighbourhood Plans that will meet development needs.

2.35 A number of communities are known to be exploring Neighbourhood Plans for their area (table 5).

Table 5 – Neighbourhood Plan Status

Neighbourhood Plan Area	Status
Wray with Botton	Area approved 20 th February 2015
Aldcliffe-with-Stodday	Received 16 th August 2018
Carnforth	Accepted 25 th April 2018
Caton with Littledale	Area approved 2 nd July 2015
Cockerham	Area approved July 2015
Halton with Aughton	Approved 26 th October 2015
Slyne with Hest	Approved 12 th April 2016
Morecambe	Approved 26 th April 2016
Wennington	Approved 24 th November 2016
Dolphinholme	Approved 24 th January 2017
Arkholme with Cawood	Accepted 12 th February 2018

2.36 The Publication document identified potential for 250 dwellings from Neighbourhood Plan areas. Importantly none of these sites benefited from planning permission and as such no expectation for delivery from them is anticipated within the five year supply. Delivery was therefore not anticipated to commence until 2022/23. After this date the trajectory contained an expectation for 25 dwellings per annum, equivalent to 300 dwellings up to 2033/34. Whilst

rising above the 250 identified supply, the council considered it reasonable to expect delivery in excess of the level identified as further opportunities for growth are explored.

- 2.37 The 2018 SHELAA provides a detailed assessment of sites located within Neighbourhood Plan areas. This ensures a consistent method of assessment is available for all known sites in the district. Whilst the SHELAA will include an assessment of the deliverability of these sites, they will not be allocated by the Local Plan with decisions as to whether or not to allocate them being made within the individual Neighbourhood Plans. Their ability to add to the overall housing supply of the district is included within the housing trajectory. The SHELAA identifies potential for 107 dwellings to be delivered within Neighbourhood Plan areas (appendix 5).
- 2.38 On the basis of this information an allowance has been made for delivery from Neighbourhood Plan sites. This is based on consideration of the sites identified in neighbourhood planning areas within the SHELAA and progress made within Neighbourhood Plan documents with amendments made where necessary. This has informed the identification of Neighbourhood Plan requirements which had been proposed as potential amendments to Policy SP6 'The Delivery of New Homes'. It should be noted that this is in addition to supply identified through already approved sites at these locations.
- 2.39 None of these sites benefit from planning permission. In view of this no expectation above what is already approved is anticipated in the first five years. Delivery is therefore not anticipated to commence until 2024/25. After this anticipated delivery of 15/16 dwellings a year, equivalent to 110 dwellings up to 2030/31. This will be kept under review via the housing land monitoring process and via dialogue with Neighbourhood Plan groups.

Windfall Allowance

- 2.40 Paragraph 70 of the NPPF states that local planning authorities may make an allowance for windfall sites where there is compelling evidence that they will provide a reliable source of supply. Importantly any reliance should be realistic having regard to the SHELAA, historic windfall delivery rates and expected future trends.
- 2.41 The publication document included an expectation for 35 dwellings per annum from 2022/23. This was on the basis of historic trends which had seen 384 dwellings completed since 2006/07 on sites below 5 dwellings, excluding garden land.
- 2.42 This information has been updated to include the most recent full monitoring year 2017/18 and has been extended to include small sites between 5 and 10 dwellings (table 6). This confirms that over the last 12 years 952 dwellings have been completed on such sites, this excludes residential garden sites. The Council considers it reasonable to expect small site delivery on currently unidentified sites to continue within the district especially having regard to the more positive framework described in the emerging Local Plan.
- 2.43 Having regard to the above and taking account of historic trends, the Council has included an allowance from windfall sites of 60 dwellings per annum. This is equivalent to recent trends taken from the start of the plan period, 2011/12. It has been assumed that the majority of the housing requirement for the early years of the Local Plan will be delivered on sites which already benefit from planning permission and as such this allowance has only been included for the final 10 years of the plan, from 2024/25 onwards. A total of 420 dwellings are expected to be delivered from this source to 2030/31. This will be kept under review.

- 2.44 The opportunity for supply from smaller sites to continue to come forward in addition to current approvals is supported in the 2018 SHELAA. Using a multiplier of 30 dwellings per hectare on small sites (1-5 dwellings) would indicate potential for 294 dwellings, these sites have not been individually assessed within the SHELAA. A further 45 dwellings have been found deliverable on sites identified as being capable of delivering 5 to 10 dwellings, these have been assessed as deliverable/developable under the SHELAA. A continued expectation for delivery from this source is therefore supported.
- 2.45 It should be noted that this source of supply is subject to a lapse rate adjustment of 20%. This recognises the need for some caution in considering this source and recognises the fact that whilst reflecting an average delivery rate over the last 7 years, a rate of 60 dwellings plus per annum has only been achieved in 3 of these years. The 20% lapse rate would see this figure reduced to an expectation of 48 dwellings per annum (336 dwellings up to 2030/31), within the potential supply of 339 dwellings identified on small sites within the SHELAA.

Table 6 – Historic Small Site Delivery

	Small site completions below 10 dwellings and excluding residential gardens
2006/07	113
2007/08	185
2008/09	133
2009/10	37
2010/11	33
2011/12	49
2012/13	56
2013/14	61
2014/15	121
2015/16	24
2016/17	83
2017/18	57
TOTAL	952

Future Cities

- 2.45 The Publication document included an expectation for 600 dwellings through higher density development. This was on the basis of an expectation of more central based living and higher density developments supporting a less car orientated society.
- 2.46 Background Paper 2 prepared to support the Submission version of the Local Plan noted work undertaken by Lancaster University via the Future Cities project which explored the growing importance of cities in meeting future society needs, forming important transport and resource hubs.
- 2.47 An expectation for higher density developments was therefore included within the later stages of the plan period.

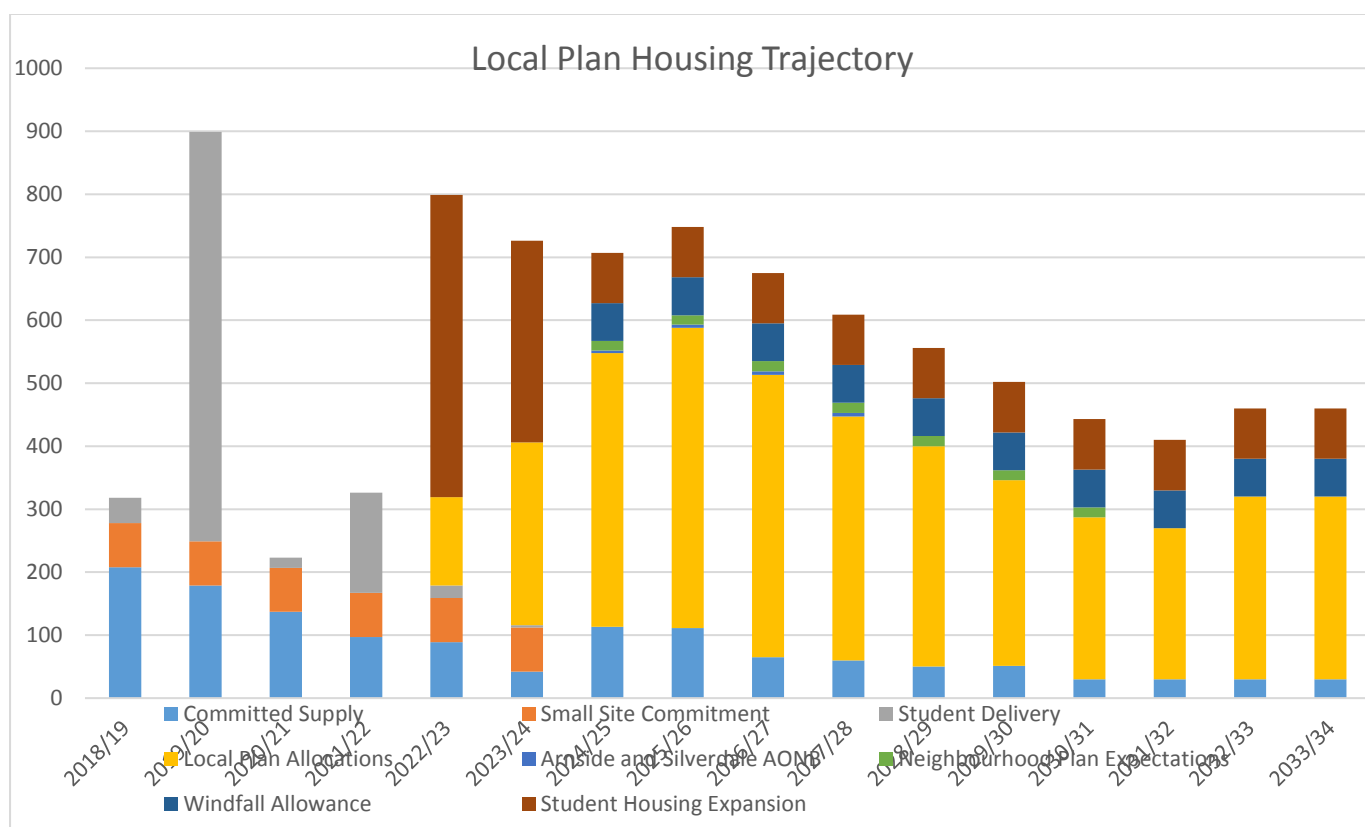
2.48 Whilst the Council still considers the potential for supply from higher density developments in the later stages of the Plan, it recognises that in the absence of specific sources of supply and given the work undertaken to support the SHELAA and Brownfield Register it can no longer rely on this as a source of future supply. For this reason this expectation is no longer included within the Plan.

3. Housing Delivery

3.1 Taking into account the above sources of supply the trajectory reports the following housing delivery position for the district over the Local Plan period 2011/12 to 2030/31:

	Plan period year	Completions	Delivery expectations
Pre-adoption	2011/12 – 2017/18	2,595	
Pre-adoption	2018/19		318
Post adoption to 2030/31	2019/20 – 2030/31		7,651
TOTAL		10,564	

3.2 An additional supply of 1,330 dwellings is identified for the longer NPPF delivery period up to 2033/34.



Lapse Rate

- 3.3 In line with the 2017 SHELAA methodology a lapse rate of 20% has been applied to small sites within the trajectory. Sites over 10 dwellings have been individually assessed as part of the SHELAA. A further lapse rate for these sites is therefore not viewed to be appropriate with these sites already having been subject to a more detailed analysis.
- 3.4 Analysis of the trajectory has identified potential for 420 dwellings as part of windfall expectations, a further 350 from small site commitments and 105 from Neighbourhood Plan³ areas. Application of the 20% lapse rate on these sites would result in an overall reduction of 175 dwellings from the trajectory.

Housing Requirement

- 3.5 The amended housing trajectory identifies potential in the district to deliver 10,564 dwellings over the Local Plan period 2011/12 to 2030/31. This is reduced to 10,389 dwellings when the above 20% lapse rate for small sites is applied.
- 3.6 To allow for demolitions and change of uses this figure has been reduced by a further 100 dwellings to 10,289. For information past demolition and change of use rates are reported below in table 7. This indicates an average loss of 3 dwellings per annum equivalent to 60 dwellings over a 20 year plan period. The expectation for 100 dwellings is above this, creating an additional buffer for losses in excess of that envisaged by past trends.

Table 7 – Historic demolitions and change of uses

Year	Residential dwelling loss from change of use	Residential dwelling loss through demolition
2011/12	0	3
2012/13	3	0
2013/14	1	0
2014/15	2	0
2015/16	7	0
2016/17	3	0
2017/18	3	1
2018 (up to Dec)	4	0
	23	4

- 3.7 The OAN for the district was calculated on the basis of a plan period ending 2030/31, identifying a need for 13,500 new homes, 675 new dwellings per annum. On the basis of the

³ Whilst some Neighbourhood Plan sites may exceed 10 dwellings the Council consider that given the stage in the planning process that these sites are at the 20% lapse rate should also be applicable to these sites. This will be kept under review.

above it is clear that, despite having maximised opportunities for delivery, in the context of infrastructure and physical constraints the council is unable to meet its full OAN figure.

- 3.8 The Council acknowledged its inability to meet its OAN in the submitted Plan and on the basis of information available at the time identified a requirement for 522 dwellings per annum over a longer NPPF delivery period 2011/12 to 2033/34.
- 3.9 Having undertaken further analysis of the data, as described above, it is clear that even this figure is challenging with delayed implementation of schemes impacting on the council's ability to meet its submitted housing requirement.
- 3.10 On this basis and having regard to the emerging standardised methodology figure of 402 dwelling per annum for the district being suggested by the new standardised methodology the Council are proposing a further revision to its housing requirement informed by its ability to deliver housing supply.
- 3.11 In view of the above assessment and having regard to a 20 year plan period 2011/12 – 2030/31 the council would propose a new supply led requirement for the district of **510 dwellings per annum equivalent to 10,200 dwellings over the plan period.**
- 3.12 In line with the NPPF Policy SP6 'The Delivery of New Homes' of the Local Plan establishes a longer delivery period of 15 years, setting out how the council propose to deliver housing for an additional 3 years of supply beyond the plan period, 2031/32 – 2033/34.
- 3.13 The council propose to roll forward the 510 housing requirement for each of the additional years, equivalent to 1,530 dwellings. In the final 3 years of the delivery period 2031/32-2033/34 the trajectory identifies a supply of 1,330 dwellings (table7). In total the trajectory identifies a supply of 11,894 dwellings, 164 dwellings above the overall requirement of 11,730 for this longer time period.
- 3.14 Whilst acknowledging the limited buffer that this provides the Council is confident that in the context of the Local Plan period the housing requirement can be delivered. Also, that over the longer term delivery period additional opportunities will emerge following the implementation of the infrastructure included as part of the Local Plan which is considered sufficient to secure growth and accelerate delivery above rates currently envisaged. This will of course be monitored and kept under review.

Table 8 – Delivery Summary

	Years	510 Requirement	Delivery	Over/under supply
Pre adoption	2011/12 – 2017/18	3,570	2,595	-975
Pre adoption	2018/19	510	318	-192
Years 1 -5	2019/20 – 2023/24	2,550	2,973	423
Years 6-10	2024/25-2028/29	2,550	3,733	1,183
Years 11 – 15	2029/30-2033/34	2,550	2,275	-275
Running over/under supply		11,730	11,894	164

Five Year Supply

The Council is aware of the need to demonstrate a five year supply at examination. The Council's five year supply position has been recalculated on the basis of the proposed new housing requirement of 510 dwellings and is shown below as of the 1st April 2019.

For reasons described further below the Council propose that the best approach to deliver a 5 year supply is to use a stepped housing target combined with the Liverpool approach to dealing with past periods of under delivery.

Under-delivery

In applying the Liverpool method the Council acknowledges that a significant component of its future housing land supply is reliant on the delivery of a number of large scale strategic sites including the delivery of a new Garden Village. These sites inevitably have longer lead in times being reliant on the provision of substantial new infrastructure. They will not be in a position to contribute to the districts housing supply until the later stages of the Plan period. On this basis it is proposed to spread past periods of undersupply over the remaining years of the plan period rather than seek to address this over the next five year period.

Application of the Sedgfield method is not considered to be appropriate within this district. It is not clear where supply in addition to that identified could be delivered to meet both the emerging housing requirement and past periods of under-delivery. As outlined elsewhere the Council has undertaken a comprehensive assessment of future supply via its SHLAA. This has confirmed the constrained nature of the district and the limited opportunities that exist for growth beyond that identified. The ability for additional sites to be identified which could be brought forward with sufficient speed to contribute to supply in the next five years is questionable.

On this basis the Council propose to use the Liverpool method. This would see the 1,167 dwelling undersupply spread over the remaining 12 years of the plan.

NPPF Buffer

The 2012 NPPF makes it clear that in planning for new homes local authorities must identify and update annually a supply of specific deliverable sites sufficient to provide five years of their housing requirement with an additional 5% buffer to ensure choice and competition in the market. The NPPF states that where there has been a record of persistent under delivery of housing, the buffer should be increased to 20%.

Whilst additional clarity has now been provided in the revised 2018 NPPF the 2012 NPPF provides no guidance on the meaning of a 'record of persistent under-delivery' and as such it is for Councils to interpret the meaning of this phrase and determine the appropriate level of buffer to apply to its five year housing land supply position.

The Council recognise that looking at past delivery, delivery in excess of the current 400 dwelling per annum requirement has been exceeded on only 4 of the last 10 years with an undersupply of 1,167 dwellings identified. On this basis the 20% buffer has been applied.

Whilst applying the 20% buffer the Council would note that the 2018 revised NPPF provides additional clarity on the buffer to use in calculating future supply. Under this revised approach the 20% buffer would no longer be appropriate with the Council's most recent Housing Delivery Test confirming delivery above the 85% threshold for the previous 3 years. In line with the revised NPPF the council would look to apply a 10% buffer. For information both buffers have been used below.

20% Buffer

$$510 * 5 = 2,550$$

+ previous undersupply (1,167 dwellings)

Under Liverpool this would be spread throughout the remaining years of the Plan (12 years) 486 dwellings over 5 years = 3,036

20% buffer = 3,643 Requirement or 729 dwellings a year

10% Buffer

$$510 * 5 = 2,550$$

+ previous undersupply (1,167 dwellings)

Under Liverpool this would be spread throughout the remaining years of the Plan (12 years) 486 dwellings over 5 years = 3,036

10% buffer = 3,340 Requirement or 668 dwellings a year

The revised trajectory identifies a five year supply of 2,973 dwellings. On the basis of a 20% buffer this would be equivalent to 4.1 years. This is increased to 4.5 years using a 10% buffer.

The above calculations confirm that despite substantial effort to identify a deliverable supply the council is unable to demonstrate a 5 year housing land supply.

The Council is seeking to deliver a Local Plan which supports a substantial uplift in development from that currently set in the adopted Core Strategy. The ability to deliver this uplift is challenged with the Council reliant on the delivery of strategic sites which are not anticipated to contribute to supply until the later stages of the plan period. On this basis and in order to deliver an achievable Local Plan the Council wish to explore a stepped change to its housing requirement. This is considered to be in line with the NPPF which requires plans to be aspirational but realistic.

Stepped approach:

Plan Period		Housing Requirement	Requirement Total	Supply	Over/under supply
Pre-adoption	2011/12 – 2018/19	Continue application of the adopted 400 dwellings per annum requirement	3,200	2,913	-287

Post Adoption Years 1 -5	2019/20 - 2023/24	Apply a stepped increase to 450 dwellings	2,250	2,973	723
Post Adoption Years 6-10	2024/25 – 2028/29	Apply a stepped Increase to 675	3,375	3,733	358
Post Adoption Years 11-12	2029/30 – 2030/33	Apply a stepped Increase to 685	1,370	945	-425
			10,195	10,564	369

The above approach is based on a series of uplifts programmed to coincide with the delivery of strategic sites within the district. It initially proposes continuation of the current housing requirement of 400 dwellings per annum continued until the plan is adopted, assumed to be 2019/20.

As already identified the reliance of the council on a number of large strategic sites reduces its ability to achieve the early uplift assumed possible with a higher housing requirement. On this basis whilst still proposing an uplift to its housing requirement a more realistic uplift has been applied of 450 dwellings per annum. Through this period the council will continue to work with the development industry to support the development of sites. Whilst this may lead to the earlier release of some sites the Council considers it unrealistic to expect levels of growth significantly beyond those anticipated in the trajectory. On this basis a requirement of 450 dwellings per annum is considered realistic and achievable. It would also allow the council to demonstrate a five year supply whilst at the same time ensuring that the requirement is not overloaded at the end of the Plan period.

Amended five year supply position:

$450 * 5 = 2,250$

+ past periods of under-delivery (287) which under application of the Liverpool method would continue to see this delivered over the remaining years of the plan period (120 dwellings) = 2,370

Application of the 10% buffer = 2,607 or 521 dwellings per annum.

On the basis of a supply of 2,973 dwellings the council would be able to demonstrate a 5.7 year supply.

Two further increases are then scheduled for the remainder of the plan period with the level of uplift reflecting the delivery of strategic sites and increased delivery rates as developers become established on site.

Appendix 1 – Student Housing Delivery Note

Introduction

The housing needs of students in the district, whether in purpose built accommodation or shared conventional housing, forms part of the overall housing needs of the district. In line with government guidance and the council's own Objectively Assessed Housing Needs (OAN) calculations an expectation of student delivery based on known approvals is included within the council's future housing supply.

The completion of every new purpose built student accommodation contributes to meeting the district's overall housing need, it is not in addition to this need. This paper seeks to describe current and future student provision in the district and explains how student housing is counted within the overall housing supply of the district.

Student numbers

The district is home to two universities, Lancaster University and the University of Cumbria. Both have a prominent presence in the district and together are home to a significant number of students both on and off-campus.

There has been considerable growth in student housing in the district over recent years with a rise in the number of purpose built accommodation being provided in the main city centre. Most providers are noted to be choosing to develop either cluster flats (which comprise study bedrooms grouped together in small flats with a shared kitchen/living room) or a studio flat, rather than traditional halls of residence.

The housing needs of students in the district, whether in purpose built student accommodation or shared conventional housing, is an element of the overall housing needs for the district.

The most recent Government guidance published in the Planning Practice Guide in September 2018 states that 'all student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation in releases into the housing market' (Planning Practice Guide: 042 Reference ID: 3-042-20180913). To establish this the guidance recommends that authorities base their calculations on the average number of students living in student only households, using published census data.

The Guidance goes on to state that this should then be applied to both communal accommodation and to multi bedroom contained studio apartments. Studio flats in mixed developments designed for students, graduates or young professionals should be counted as individual components. The guidance advises that a studio flat is a one room-apartment with kitchen facilities and separate bathroom that fully functions as an independent dwelling.

Student bedrooms within the district have historically been converted into dwelling units based on an analysis of individual applications. The assessment identified whether accommodation is capable of being split into separate units focussed on the number of bedrooms clustered around a shared living space such as a kitchen. In general 4-6 bedrooms have been taken to represent a unit although this has varied across sites.

The Submitted Local Plan noted that as of the 1st September 2017 there was an outstanding commitment in the district which based on the council's analysis of planning applications related to

787 dwelling units (2,077 student bedrooms). Following a review of delivery with Development Management colleagues this figure was revised down to 747 dwelling units.

Based on information from development management the trajectory identified potential completion rates for student housing. As reported previously the trajectory envisaged above average completion rates during 2018/19, 2019/20 and 2020/21 as a number of large schemes are completed e.g. Luneside East, St Leonards House and Bulk Road in Lancaster. The flatted nature of these applications mean that they are likely to be completed at the same time. After this it is anticipated that numbers will return to more normalised levels.

For information historic completions are shown below. This reports more modest levels of growth within the district and as above is based on an assessment of individual planning applications. This information is included as part of historic completions within the submitted housing trajectory.

Table 1 – Historic Student Completions

	Student completions – dwelling equivalents	Student bedrooms
2011/12	10	46
2012/13	39	211
2013/14	3	19
2014/15	0	0
2015/16	24	100
2016/17	0	0
2017/18	27	103
TOTAL	103	479

Following the greater clarity provided in the new Planning Practice Guidance and in order to ensure consistency with future Housing Delivery returns the council has reassessed its future student delivery on the basis of the revised guidance and census returns for the number of students living in student only households in the district. This is reported below and provides the opportunity to ensure, in the absence of previous guidance, a consistent approach to future student delivery in the district.

Student delivery – census returns

The census results for the number of students living in student only households in the district is reported in table 2 below. This confirms that the greatest number of students live in one or four bedroom households. On the basis that 1 bedroom studio accommodation is already counted as one unit under the above guidance the council has determined that in relation to developments one bedroom and above an average size of 4 bedrooms per dwelling unit should be applied.

Table 2 – 2011 Census Data for the Number of Students living in Student only households within the District

All student only households where all students are aged 18 or over *	1 student in household	2 students in household	3 students in household	4 students in household	5 students in household	6 students in household	7 students in household	8 students in household	9 students in household	10 students in household	11 students in household	12 students in household	13 students in household	14 students in household	15 or more students in household
1,377	352	224	165	340	188	78	16	9	2	2	0	0	0	1	0
Average	26	16	12	25	14	6	1	1	0	0	0	0	0	0	0

The Council has sought to verify this figure via an analysis of the average property size of stock registered under Lancaster University’s student housing accreditation scheme. Purpose built accommodation has been excluded from this with the analysis focussed on students living within the general housing stock of the district.

This reports a total of 1,184 bedrooms over 268 properties as of August 2018, an average of 4 bedrooms per property.

On the basis of this information the Council has assumed an average release rate of 1 property per 4 student bedrooms. The exception to this is for studio apartments which under the planning practice guidance can be treated as one dwelling unit where it fully functions as an independent dwelling with its own kitchen facilities and separate bathroom. This has been confirmed by a review of individual planning applications.

Student Permissions

On the basis of the above analysis the council has reassessed the information presented in the submitted plan. Based on the application of a 4 bedroom to 1 dwelling unit ratio for all developments other than studio accommodation which is taken at a rate of 1 studio per dwelling unit, the number of dwelling unit equivalents based on student bedroom permissions at the point of submission is increased to 912 dwellings, an additional 125 dwelling units from that anticipated at submission.

Lancaster University Student Growth Expectation

As part of the preparation of the Lancaster South Area Action Plan (AAP) the council has undertaken additional work in relation to the growth expectations of Lancaster University. Whilst this work is being undertaken to inform the AAP it has assisted in the Council’s overall understanding of future growth expectations at Lancaster University and the implications of this for student numbers in the district.

Table 3 – Lancaster University Student Growth (2017 Lancaster University Masterplan (John McAslan and Partners)

Phase	Location	Number of Beds	Completion Year
Phase 1	Campus	600	2020
Phase 2	Campus	400	2021
Phase 3	City	600	2022
Phase 4	City	400	2023

As identified in table 3 the University has identified expansion plans for 1,000 student beds on-campus by 2021 and a further 1,000 beds off-campus by 2023. At the time of submitting the Plan the Council sought to translate this to dwelling unit equivalents with just under a third of the 1,000 beds counted as dwelling equivalents within the trajectory, 330 units.

At the time of publication the 1,000 student bed off-campus delivery were included under Policy DOS2 with this delivery anticipated to occur as part of the Canal Corridor development. This was again translated to 330 dwelling equivalent units.

Since submitting the Local Plan the Government published the ‘Housing Delivery Test Measurement Book’ (July, 2018). This provides additional guidance on the treatment of student delivery within calculations identifying a standard ratio of 2.5 bedrooms per dwelling unit per communal based accommodation.

The Housing Flows Reconciliation Guidance identifies communal accommodation as covering school, university and college student accommodation, hospital staff accommodation, hostels, care homes and defence establishments (not married quarters). This has been taken to be a separate calculation from that recommended by the Planning Practice Guide Update which clearly indicates that student accommodation can be included in the general housing stock on the basis of up to date census calculations. The Housing Delivery Test makes clear that communal accommodation, taken to be traditional halls of residence style accommodation, is a separate calculation with the 2.5 ratio applicable.

Up to date information from the University has indicated a delay in the anticipated delivery of on-campus bedroom completions, with September 2022 now considered the likely completion year. The University have advised that they are likely to need 1,000 bed spaces by 2023/24.

On this basis the council has reassessed its expectations for delivery from student accommodation anticipated from expansion on-campus with 400 dwelling unit equivalents expected to be delivered as a result of 1,000 bed completions by 2023/24, an increase of 70 dwelling units from that included within the Submitted Plan. A similar expectation has been made in relation to off-campus expansion.

In addition to the above considerations Lancaster University has made it clear of its ambitions for growth in addition to that expected in table 3 above with a further 1,000 bedrooms planned for on-campus post 2023 and an additional 1,000 bedrooms off-campus via further expansion post 2023. An expectation for this has been incorporated into an updated Local Plan trajectory. This has resulted in a further 400 dwelling unit equivalents on-campus, taking the total to 800 on-campus and an additional 400 dwelling unit equivalents to be delivered off-campus.

Permissions and Completions September 2017 – December 2018

In order to provide an updated position new student housing permissions granted and completed since the submission trajectory have been included with a new base date of 31st December 2018 set in the trajectory.

New student permissions

Since the 1st September 2017 a further 151 student bedrooms have been approved in the district across 14 planning applications. Using the new definition in the planning practice guide this is translated into 61 dwelling unit equivalents.

As in the publication document the anticipated delivery of these sites has been included within the housing trajectory.

As of the 31st December 2018 there was an outstanding commitment for 1,965 student bedrooms. This takes account of following an assessment of applications and application of the 4 dwelling ratio this is translated into a dwelling equivalent of 849 dwelling units.

Lapsed applications have been removed from the supply. The Council has also reassessed submitted applications which has in a number of instances led to further amendments.

Student Completions 1st April 2018 – 31st December 2018

To date within the financial year 2018-2019 a total of 128 student bedrooms have been completed, equivalent to 40 dwelling units.

Conclusion

The paper has sought to explain the basis for the publication document and explain how moving forward new information on the calculation of student numbers together with additional permissions and completions since submission have led the council to prepare an amended housing trajectory.

With the exception of evidenced growth expectations from Lancaster University no additional allowance in addition to that from committed schemes is included within the housing trajectory for the district.

Appendix 2 – Publication Commitment Update

LPSA	Site	Publication Expectation	Post Publication Completions	Updated Position (Dec 2018)	Commentary
11	Land East of Arkholme Methodist Church, Kirkby Lonsdale Road	17	0	16	<p>Commencement delayed from publication to reflect advice from Development Management.</p> <p>The site now benefits from RM approval for 16 dwellings (approved December 2018).</p> <p>Currently pursuing discharge of conditions, no discharge of condition application as yet. Noted to be a number of conditions awaiting application to discharge. Information from the agent confirms that the owner of the site is in discussions with a potential purchaser.</p> <p>Correspondence with DM advises commencement 2021/22</p> <p>On the basis of a RM approval and the evidence presented the council consider it reasonable to expect completions within the next 5 years.</p>
	The Sheiling, Kirkby Lonsdale Rd, Arkholme	0	0	0	Completed
Bolton-le-Sands					
32	Land East of Railway Crossing, St Michaels Lane	20	0	20	This site is under construction. Completions are anticipated within the next financial year 2019/20.
	Land East of Coastal Road	0	0	0	Completed
	Coastal Road Phase 2	18	18	0	Completed
Caton and Brookhouse					

851	Former SJ Bargh site, Hornby Road	30	0	30	The site is in the advanced stage of development with the site nearly complete. Whilst only one completion certificate has been issued for plot 1 further certificates are expected.
38	Land West of Sycamore Road	22	0	22	This site is under construction. Completions are anticipated within the next financial year 2019/20 with the site expected to be completed 2020/21.
Carnforth					
61	Lundsfield Quarry, Kellet Road	200	0	0	Permission has now lapsed. The site continues to be included as an allocated site
	Bank Field, Scotland Road	18	0	0	The site is not considered implementable and has been removed from the commitment
	Land South of Carnforth Cemetery, Carnforth	14	0	0	The application has now lapsed
	Red Court	40	40	0	Completed
832	Land to the rear of Queens Hotel	10	0	10	On-site. The site is almost complete with some units (6) already completed and completion certificates expected to be issued for the remaining units within this financial year.
Cockerham					
643	Land South of Marsh Lane	25	0	0	Permission lapsed on the 9 th December. On this basis the site has been removed from the 5 year supply. No further evidence available to confirm deliverability. The site is however viewed to be developable and as such continues to be allocated within the Local Plan.
643	Land off Marsh Lane and Main St, Cockerham	11	0	11	Whilst still benefiting from outline approval in view of the uncertainty surrounding the wider site the Council are unable to conclude that the site is deliverable and as such the site is not included within the councils 5 year supply. The site is however viewed to be developable and as such continues to remain within the housing land supply.
Cowan Bridge					

119	Burr Tree Meadow, A65	18	15	3	The site is complete with the remaining units completed in 2018/19
Galgate					
	Land North of Stoney Lane	41	41	0	Complete
	Launds Field, Stoney Lane	2	2	0	Complete
Halton					
713	Halton Mill, Mill Lane	20	0	0	<p>Whilst the site is considered developable it is not considered to be deliverable in the immediate future and as such is not included within the council's five year housing supply.</p> <p>The approval for 20 dwellings has now lapsed and as such whilst the trajectory continues to contain an expectation for delivery this is on the basis of an allocation and not an approval.</p> <p>Whilst the SHELAA identifies potential for 30 dwellings the trajectory continues to identify capacity for 20 dwellings. This is on the basis that the additional 10 dwellings in the SHELAA relate to the land approved for the erection of a new nursing home. This has been taken to be separate to the council's OAN calculations.</p>
163	Land South of Low Road	60	0	60	The site is under construction. Completion certificates have been issued for two dwellings as of January 2019. Further units are noted to be under construction with further completions anticipated within this financial year. Build out rates have been aligned to those provided by VMC Developments.
669	Land South of Forge Lane	90	0	76	Site benefits from RM approval. Reduced under RM application Evidence from the developer confirms progress on delivery. On this basis the site is included within the council's five year supply position. The delayed approval of the RM application (09.01.19) will have had an impact on commencement. On this basis completions are not anticipated to be delivered until 2020/21.
159	Land North of High Road	66	0	66	A new full application has been submitted (18/01422/FUL). This is noted to almost be a re-submission of application 17/00224/FUL which was for 70 dwellings. During the course of the applications determination the number was reduced to 66. The original application gained a resolution to grant planning permission subject to the preparation and signing of a S106 Agreement on the 24 th July 2017. The decision notice was issued on the 19 th October 2018.

					<p>The current application notes that since the decision to grant approval it has become apparent that development proposals are not viable if the 28 affordable homes are to be delivered. The new scheme has been prepared on this basis.</p> <p>The trajectory has been amended accordingly.</p> <p>Russel Armer in May 2018 had anticipated completions in Q1 of 2020. The delayed determination of this scheme will have impacted on these timescales. This is reflected in the trajectory.</p>
Heysham					
	Land West of Middleton Road (Trumacar Lane)	69	0	0	<p>The current outline has now lapsed. A new outline remains subject to S106 Agreement.</p> <p>Whilst the council has made a resolution to approve application 17/00848/OUT it remains subject to the signing of a S106 Agreement. On this basis and given that the site is an outline only the site is no longer included within the councils 5 year supply. This will be kept under review. Development Management colleagues have advised that a RM application is expected Q2 in 2020. This is reflected in the new trajectory.</p>
179	Former Police Station, Heysham	14	0	14	<p>The site benefits from a Full approval. Information from the agent confirms a continued commitment to bring the site forward. On this basis the site continues to be included within the council's five year housing land supply.</p>
	Mossgate Park, Mossgate Road (North, Cenral and South)	12	12	0	Complete
Hornby					
240	Land North of Royal Oak Meadow	23	0	23	<p>Whilst evidence from the agent confirms delivery expectations for the site with a RM application expected to be submitted the absence of this application means that the council is unable to include this site as part of its 5 year supply.</p> <p>A full application for 28 dwellings (18/01611/FUL) is currently awaiting determination.</p>
Lancaster					
255	Land East of Bowerham Lane	20	0	25	<p>The site benefits from a Full approval. A variation of condition application is currently pending (18/01413/VCN).</p> <p>Development Management have indicated a commencement on site in March 2019. On this basis the site is included within the councils 5 year supply.</p> <p>The capacity has been amended to 25 to reflect new approval.</p>

286	Luneside East	149	1	148	On-site. Completions aligned to reflect most recent information from the developer.
287	Nightingale Hall	63	39	24	Final units expected to be completed 2018/19.
	Fomer Chorley Nissan Garage, Wheatfield Street	0	0	0	Complete
	Lancaster Moor Hospital Conversion	0	0	0	Complete
313	Lancaster Moor Hospital Grounds Development	69	32	37	Final units expected to be completed 2018/19.
323	Luneside West	152	120	32	Nearly complete with all units expected to be completed 2018/19
389	Moor Park, Quernmore Road	62	23	39	9 remaining units expected to be delivered in 2019/20.
716	Lancaster Leisure Park	10	7	3	Final units completed 2018/19
	Greaves Hotel	16	16	0	Completed
260	New Quay Road	12	0	12	On the basis that the scheme is only an outline it has not been included within the five year supply. That said it is noted that a developer is pursuing this site with an application and grant funding for delivery expected to be submitted shortly. Its delivery should therefore be kept under review.
Middleton					
408	Former Pontins Holiday Camp, Carr Lane (Phase 1)	161	0	161	Whilst the site is considered to be developable the absence of information mean that the council is unable to conclude that it is deliverable and as such have not included it within its five year housing land supply.
	Old Roof Tree Inn, Middleton	10	10	0	Complete

408	Former Pontins Holiday Camp, Carr Lane (Phase 2 and 3)	415	0	415	Whilst the site is considered to be developable the absence of information mean that the council is unable to conclude that it is deliverable and as such have not included it within its five year housing land supply.
Millhead					
414	Land Between Grange View and Bradden, Mill Lane	21	0	25	The site is under construction. On the basis of site progress the Council would anticipate all units being completed in 2020/21. An additional 4 units have been included to reflect the submission of application 18/00349/FUL which would result in the substitution of 4 units in the original application with 8 units.
Morecambe					
	Land East of Regents Road Bridge, Westgate	43	43	0	Complete
	Land South of Wellington Terrace and King Street	0	0	0	Complete
523	Broadway Hotel, Marine Road East	50	0	50	Under construction. Completions still envisaged for 2019/20
	240-241 Marine Road, Morecambe	0	0	0	Complete
	Land west of 113 White Lund Road, Oxcliffe Road	10	0	0	A new application has seen this site fall below 10 dwellings. Whilst it has been removed from the trajectory it continues to be included as part of the small site commitment.
	Grove Street Depot	21	21	0	Complete
Nether Kellet					
	Land East Of Briar Lea Road	10	0	0	A new application has seen this site fall below 10 dwellings. Whilst it has been removed from the trajectory it continues to be included as part of the small site commitment.
Overton					

557	Land North of Overton Primary School, Lancaster Road	32	0	32	<p>The site benefits from a full permission. Permission includes conditions requiring submission of drainage design, management & main of drainage, arb statement, floor levels, ecology mitigation, landscaping, pumping station, surfacing, materials, boundaries.</p> <p>An application to discharge conditions is considered unlikely until the site has been sold or at least optioned. On this basis completions are not anticipated until 2022/23.</p>
Warton					
685	Land East of Farleton Close	23	0	25	<p>Whilst only an outline the council is confident that the site can be included within the 5 year supply with a RM application currently awaiting determination</p> <p>It is noted that the developer is moving from the scheme at Millhead to this site following completion at Millhead. Delay at this site reflects the amended trajectory for the Millhead site with completions not anticipated until 2021/22.</p> <p>Capacity for this site has increased to 25 dwellings to reflect new application for additional units.</p>
Whittington					
625	Whittington Farm, Main Street	18	0	18	<p>Whilst the site has outline permission the absence of further evidence mean that the council is unable to conclude on the sites deliverability. On this basis it has not been included within the council's five year housing land supply position.</p>
New Sites					
874	Higher Bond Gate (Part of Land North of Abbeystead Road), Dolphinholme	0	0	18	<p>As the site only benefits from outline approval and in the absence of additional information the site has not been included within the council's 5 year supply</p>
640	Land North Of Hala Carr Farm, Bowerham Lane (Land East of Bowerham Lane North), Lancaster	0	0	30	<p>The site benefits from outline approval.</p> <p>Whilst evidence from the agent confirms delivery expectations for the site with a FULL application expected to be submitted the absence of this application means that the council is unable to include this site as part of its 5 year supply.</p>
259	Ridge Hotel, Lancaster	0	0	16	<p>Full application and on site. Completions envisaged within this financial year</p>
872	J Wedlake and Son, Wheatfield Street, Lancaster	0	0	12	<p>As the site only benefits from outline approval and in the absence of additional information the site has not been included within the council's 5 year supply</p>

800	Land Associated with Old Hall Farm, Over Kellet	0	0	55	The site has outline permission. In the absence of additional information delivery is not expected within the 5 year supply.
Lapsed applications no longer included in the commitment					
713	Halton Mills, Halton	20	0	0	Whilst no longer included in the committed component of the trajectory these sites are included within the allocated site component of the trajectory. Land West of Middleton Road is included as a pending application (appendix 3).
117	Land West of Middleton Road (Trumacar Lane)	69	0	0	
643	Land South of Marsh Lane, Cockerham	25	0	0	

Appendix 3 – Pending Decisions

LPSA	Site	Publication Expectation	Post Publication Completions	Updated Position (Dec 2018)	Commentary
836	Land adjacent to Church Bank and Greenways, Over Kellet	0	0	15	The site remains subject to a S106 Agreement Once formalised the site only benefits from outline permission. In the absence of additional information delivery is not expected within the 5 year supply.
177	Land West of Middleton Road, Heysham	69	0	75	The current outline has now lapsed. A new outline remains subject to S106 Agreement. Whilst the council has made a resolution to approve application 17/00848/OUT it remains subject to the signing of a S106 Agreement. On this basis and given that the site is an outline only the site is no longer included within the councils 5 year supply. This will be kept under review. Development Management colleagues have advised that a RM application is expected Q2 in 2020. This is reflected in the new trajectory.
868	Land to the rear of the Manor Inn, Cockerham	0	0	24	Despite evidence from the agent the site only benefits from outline approval subject to a S106 agreement and as such has not been included within the council's 5 year supply
869	Rectory Gardens, Cockerham	0	0	18	The site remains subject to a S106 Agreement Once formalised the site only benefits from outline permission. In the absence of additional information delivery is not expected within the 5 year supply.
793	Scotland Road, Carnforth	0	0	213	The site remains subject to a S106 Agreement As the site only benefits from outline approval and remains subject to a S106 the council has been unable to include it as part of their 5 year supply. That said the council is aware of the commitment to bring the site forward with an aim to commence construction in late 2019.
138	Land East Of A6 And North Of River Conder, Galgate	0	0	68	Despite evidence from the developer the site only benefits from outline approval subject to a S106 agreement and as such has not been included within the council's 5 year supply
870	Land rear of Ingleborough View, Hornby	0	0	11	Despite evidence from the agent the site only benefits from outline approval subject to a S106 agreement and as such has not been included within the council's 5 year supply

871	Farmhouse Tavern and Motel, Morecambe				Despite remaining subject to a S106 Agreement the site is for a full application. On this basis and in light of evidence from the agent the site has been included within the Council's five year supply.
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Appendix 4 – Post SHELAA Site Assessment Paper

As identified in the introduction the Council has undertaken an additional stage of assessment following the completion of its Strategic Housing and Employment Land Availability Assessment (SHELAA). The additional stage of assessment recognises that decisions on whether or not to allocate sites identified through the SHELAA can only be made through the Local Plan process having regard to the Council's wider evidence base and wider policy considerations. Only through this process can the most appropriate use for sites be determined.

This paper explores this further, identifying those sites where a potential conflict with alternative policy designations exist and following consideration of the wider evidence base provides a view on what the Council believe to be the most appropriate use justifying the decisions made in the Local Plan.

Post Assessment of Statutory Designations

The SHELAA process is policy neutral. It makes decisions on the deliverability of sites based on a consideration of their suitability, availability and achievability for development. It leaves the policy judgements as to which sites to allocate to the Local Plan process.

The Council recognise that there are a number of sites which have been identified in the SHELAA as a potential development site but which have not been allocated for development in the Local Plan with an alternative designation being applied. The justification for making such decisions is explained within this Paper.

- **Green Belt**

One of the main reasoning's for going against the recommendations of the SHELAA relates to the Green Belt. The Green Belt is a policy consideration which through the Local Plan process can be reviewed. Paragraph 83 of the NPPF (2012) states that once established Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan.

In parallel with the preparation of the SHELAA the Council has undertaken a Green Belt review. A full report detailing the conclusions of this work was published in November 2016. This work was undertaken separately from the SHELAA and considered the continued merit of the Green Belt in isolation from future development needs.

Whilst the Green Belt Review did identify the opportunity for the removal of some areas of land it also supported the continued designation of Green Belt across large areas of the district.

In identifying future opportunities for growth the Council has had regard to the conclusions of the SHELAA and the conclusions of the Green Belt review, and considered their implications separately from their assessments.

In all but one instance the Council has aligned itself to the recommendations of the Green Belt review, with those sites identified as continuing to meet the purposes for designation remaining Green Belt within the Local Plan. On this basis, whilst the following sites were assessed positively in the SHELAA they have not been taken forward for allocation in the Local Plan with the existing Green Belt designation continuing to apply

- LPSA 711: Greenbelt between Hest Bank and Slyne
- LPSA 704: Land North of Manor Lane

The exception to this relates to land at South Carnforth. Whilst this area was noted to perform relatively well in Green Belt terms the council concluded that on the basis of limited opportunities for growth elsewhere in Carnforth and given Carnforths status as the fourth largest settlement in the district, opportunities for development in South Carnforth should be explored. As a result, the Council determined that the most appropriate option to secure sustainable growth was the release of Green Belt land to the south of the town. Whilst it is accepted and recognised that this land does have value, the release of it is not considered to have a strategic value with the Council satisfied that growth can be achieved without damaging the strategic role that the North Lancashire Green Belt plays in ensuring that settlements do not coalesce.

On this basis the Council, aligning with the deliverability assessment of the SHELAA, have recommended the removal of this site from the Green Belt and its allocation as a strategic housing site in the Local Plan.

- **Local Landscape Designations**

In preparing the Local Plan the Council has continued to designate key areas of local landscape across the district. These are those landscapes that have been historically important and which together have helped shape the character of the district with many providing the setting for significant areas and features. Their continued identification remains important.

Following further assessment of this designation the council has sub-divided the designation into two components: Urban Setting Landscape (USL) and Key Urban Landscapes (KUL). Both remain important and the Council through the preparation of the Local Plan has attached great importance to maintaining the open nature of both KUL and USL.

In addition to historic allocations the Council, through its evidence base, has identified a number of additional areas for designation as USL and KUL in the Local Plan.

The Council has had regard to this evidence base together with the conclusions of the SHELAA and determined that whilst the SHELAA identified the following sites as deliverable either in their entirety or just as a small component, on the basis of its evidence base relating to the landscape value of these sites the alternative local landscape designation should be applied:

- LPSA 640: Land North of Hala Carr Farm⁴
- LPSA 255: Land East of Bowerham Lane
- LPSA 712: Land West of Railway Line
- LPSA 537: Fair View, Slyne Road
- LPSA 371: Land North of Quernmore Road
- LPSA 256 Land at Barley Cop Lane, Lancaster

⁴ The Council recognise that these two sites (LPSA 640 and LPSA 255) now benefit from planning permission for residential development. These were approved contrary to policy advice and whilst acknowledging their likely delivery the Council on the basis of its wider landscape evidence base have determined that the sites should not be allocated for residential development in the Local Plan with their continued protection on a landscape basis preferred. This will be kept under review through monitoring. The implication of this means that were the approval for residential development to lapse new applications would be considered in the context of the Local Plan which as submitted would mean determining the applications against the Local Plan landscape designation.

- **Local Green Space**

The Council has identified a number of areas for designation as Local Green Space in the submitted Local Plan. The identification of sites follows the preparation and consultation of a methodology for identifying and assessing sites and a call for sites exercise.

Following this process a total of 21 sites were identified for designation as Local Green Spaces in the Submitted Local Plan.

No conflict has been identified in relation to the SHELAA and this designation.

- **Other Policy Considerations**

In addition to the above the Council on a number of other occasions has determined, on the basis of further policy considerations, not to allocate a number of further sites despite them receiving positive consideration within the SHELAA. The following sites whilst being positively assessed in the SHELAA have not been taken forward for allocation by the Council:

LPSA 701 Land west of Gressingham Road, Hornby

This site lies within the designated landscape of the Forest of Bowland AONB. The Council considers that the development of the site would constitute major development within the AONB, and that paragraph 172 of the NPPF would apply. The Council commissioned a landscape assessment of the site, concluding that the development of the entire site would have impacts on the landscape character and visual amenity of the AONB that could not be mitigated. Given this level of impact, the Council could not support the development of the entire site. The site has not been proposed for allocation on this basis.

LPSA 793 Land adjacent to Scotland Road, Carnforth

Whilst the SHELAA identified the site as a deliverable housing site the Council in determining whether to allocate the site continue to have concerns regarding this site and its relationship with the existing settlement pattern of Carnforth. Whilst it is accepted that there is some employment development to the south of the proposed site, beyond the railway line, residential development to the scale proposed is not considered to represent a natural extension to the current urban form of the town being poorly related to the existing settlement pattern and as noted by the Councils landscape evidence would result in a negative impact on the local landscape and importantly on views from the AONB. On this basis the site has not been proposed for allocation within the Local Plan.

LPSA 678 Land East of Nether Kellet Road, Over Kellet

Whilst this site received positive consideration in the SHELAA the site has not been put forward for allocation in the Local Plan.

The Council investigated opportunities for dispersed growth across its rural settlements as part of its early options consultation. Following a review of this option, including a review of consultation responses and sustainability appraisal conclusions, the option was not taken forward within the Local Plan. On this basis the Council would not be expecting significant levels of growth across its rural settlements. Allocations in addition to that already suggested in Over Kellet would not therefore be supported.

- **Neighbourhood Plan Areas**

Allocations for development within these areas will be made through the Neighbourhood Plan process and not through the Local Plan. For this reason sites within neighbourhood plan areas whilst receiving a positive recommendation in the SHELAA have not been proposed for allocation in the Local Plan. Progress on preparation of Neighbourhood Plans will be kept under review through the examination process.

- **Employment Site Assessments**

With regard to employment opportunities, there are only a limited number of sites which, whilst considered positively in the SHELAA have not resulted in formal allocations in the Local Plan. The following sites whilst being positively assessed in the SHELAA have not been taken forward for allocation by the Council:

LPSA 710 – Green Belt North of Lancaster

Whilst this site received positive consideration in the SHELAA as a potential employment area, this site has not been formally allocated in the local plan for this purpose. The site has been identified in an area which is considered important to be kept open, providing a gap between the urban area of Lancaster (and the proposed growth associated with the North Lancaster Strategic Site) and the rural settlement of Halton. The proposed area of separation is identified in the Strategic Policies and Land Allocations DPD under Policy EN8 and is designed to protect the visual openness of land in the locality.

LPSA 835 - Land at VVV Gymnasium, Slyne-with-Hest

Whilst this site received positive consideration in the SHELAA as a potential employment area, this site has not been formally allocated in the local plan for this purpose for a number of reasons. The site is located in Flood Zone 3 and is at high risk from coastal flooding, this has been demonstrated with a number of flooding events at the site over recent years. Whilst this is the primary reason the site has been not allocated for employment purposes, the site is also located within the North Lancashire Green Belt and is positioned within the designated area for the Slyne-with-Hest Neighbourhood Plan.

Appendix 5 – Neighbourhood Plans

NEIGHBOURHOOD PLAN AREA	SETTLEMENT DESIGNATION	PARISH POPULATION (2015 estimate)	Approvals (No. of dwellings as of 31 st December 2018)	SHELAA	DEVELOPMENT OPPORTUNITIES	HOUSING SUPPLY
Aldcliffe with Stodday Neighbourhood Plan	Rural Village	265	2	0	No opportunities for additional growth identified	0
Arkholme with Cawood Neighbourhood Plan	Rural Village	327	6	0	The settlement is being downgraded from a Sustainable Settlement, therefore significant growth not supported. No opportunities for additional growth identified	0
Carnforth	Market Town	5,531	59	0	No additional supply has been identified above that included as part of the strategic site allocation or existing approvals.	0
Caton-with-Littledale	Sustainable Settlement (Caton and Brookhouse)	2,733	60	57 LPSA_39 LPSA_98 LPSA_100	Village located within the AONB. Three greenfield locations on the edge of the village may secure some development and provide land for screening from the wider ANOB	57
Cockerham	Sustainable Settlement	622	20	0	No opportunities for additional growth identified Neighbourhood Plan not currently active.	0

					Significant Flood Risks in the locality	
Dolphinholme	Rural Village	5923	22	0	<p>The settlement is being downgraded from a Sustainable Settlement, therefore significant growth not supported.</p> <p>The NP Group are working on a small scale development which supports local needs. The Group are working with the Duchy to achieve this. Whilst opportunity for additional supply might be identified through this source it is not considered appropriate to include an expectation for delivery from this source at this point in time. Any additional supply from this village would be as windfall.</p>	0
Halton-with-Aughton	Sustainable Settlement (Halton)	2,448	211	0	<p>Significant permissions have been granted for housing in this area over the past couple of years which have yet to be developed.</p> <p>Significant issues over flood risk and wider impacts would see the area struggle to achieve further growth. On this basis there is considered to be limited potential for further growth beyond that already approved.</p>	0
Morecambe	Key Service Centre	34,782	136	0	Due to the constrained nature of Morecambe Neighbourhood Plan Area growth in addition to consented approvals is considered unlikely.	0
Slyne-with-Hest	Sustainable Settlement (Hest Bank and Slyne)	3,159	9	30 LPSA_167	The village is located within the Green Belt, opportunities for additional developments are therefore tightly constrained.	30

					<p>Lack of opportunities for sustainable growth to an appropriate scale so as to not affect Green Belt designations.</p> <p>One potential site has been identified. Whilst this site is currently Green Belt the Council would like to explore further amendments to the Green Belt at this location to support the development proposals being suggested through the Plan.</p>	
Wennington	Rural Village	167	8	0	<p>The village is not identified as a sustainable settlement, therefore significant growth would not be supported.</p> <p>NP Group are noted to be working on small scale development which supports local needs.</p>	0
Wray-with-Botton	Sustainable Settlement (Wray)	505	12	20 LPSA_627 LPSA 632	<p>The village is located within the AONB.</p> <p>Brownfield Proposal for Hoskins Farm may become viable through the plan period although no evidence at this time.</p> <p>Two greenfield locations on the edge of village may secure small-scale growth.</p>	20
TOTAL: 107						

