

Five Year Housing Land Supply Report / Housing Land Position Statement – 31 March 2023

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1.0 Background

- 1.1. The September 2023 National Planning Policy Framework at §74, required Local Planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their local housing requirement in the adopted Local Plan. Where the Local Plan was more than five years old the local housing need figure was to be used in place of the adopted Local Plan requirement.
- 1.2. The December 2023 National Planning Policy Framework [NPPF] at §76 removes the requirement for local planning authorities to identify a five year supply of housing where their adopted plan is less than five years old and it identified at least a five year supply of specific, deliverable sites at the time that its examination concluded. The Local Plan for the former Barrow area meets the above criteria and at the base date of this report (31 March 2023) the Local Plan for Eden also met the criteria.
- 1.3. This document sets out the five year housing land supply [5YHLS] for the former local planning authorities of Barrow, Eden and South Lakeland separately, using methods agreed by the predecessor authorities, which is in accordance with national guidance for newly formed local planning authorities.
- 1.4. The Planning Practice Guidance states:

Where a newly formed Local Planning authority is covered by strategic housing requirement policies adopted by predecessor authorities, these policies can continue to be used as the housing requirement for calculating the 5 year housing land supply in the areas they apply where these are less than 5 years old, or they are older but have been reviewed within the last 5 years and found not to need updating.

Where strategic housing requirement policies, covering the predecessor authority area, are older than 5 years and require updating, local housing need should be used, where this is available. Where the data required to calculate local housing need is not available an alternative approach will have to be used.
- 1.5. For the legacy areas of Barrow and Eden the Local Plan requirement is used to calculate the 5YHLS as the Local Plans for these areas were less than five years old on 31 March 2023. An alternative method is used for the legacy area of South Lakeland as the Local Plan is more than five years old. The following area specific sections set out the detail of the calculation method used.
- 1.6. A summary of the 5YHLS for each predecessor authority is provided in the table below, and shows that all the former authorities were able to demonstrate a five year housing land supply at 31 March 2023.



Table 1: Summary of the 5YHLS for predecessor authorities

Former LPA	Barrow	Eden	South Lakeland
Adopted Local Plan more than 5 years old at 31 March 2023?	No	No	Yes
Annual housing requirement figure	119	242	142
Housing need figure - notes	Adopted LP figure	Adopted LP figure	Standard method local housing need figure with national park deduction
Deliverable housing supply (units)	751	1464	1959
Deliverable housing supply (years)	5.4	7.14	13.14

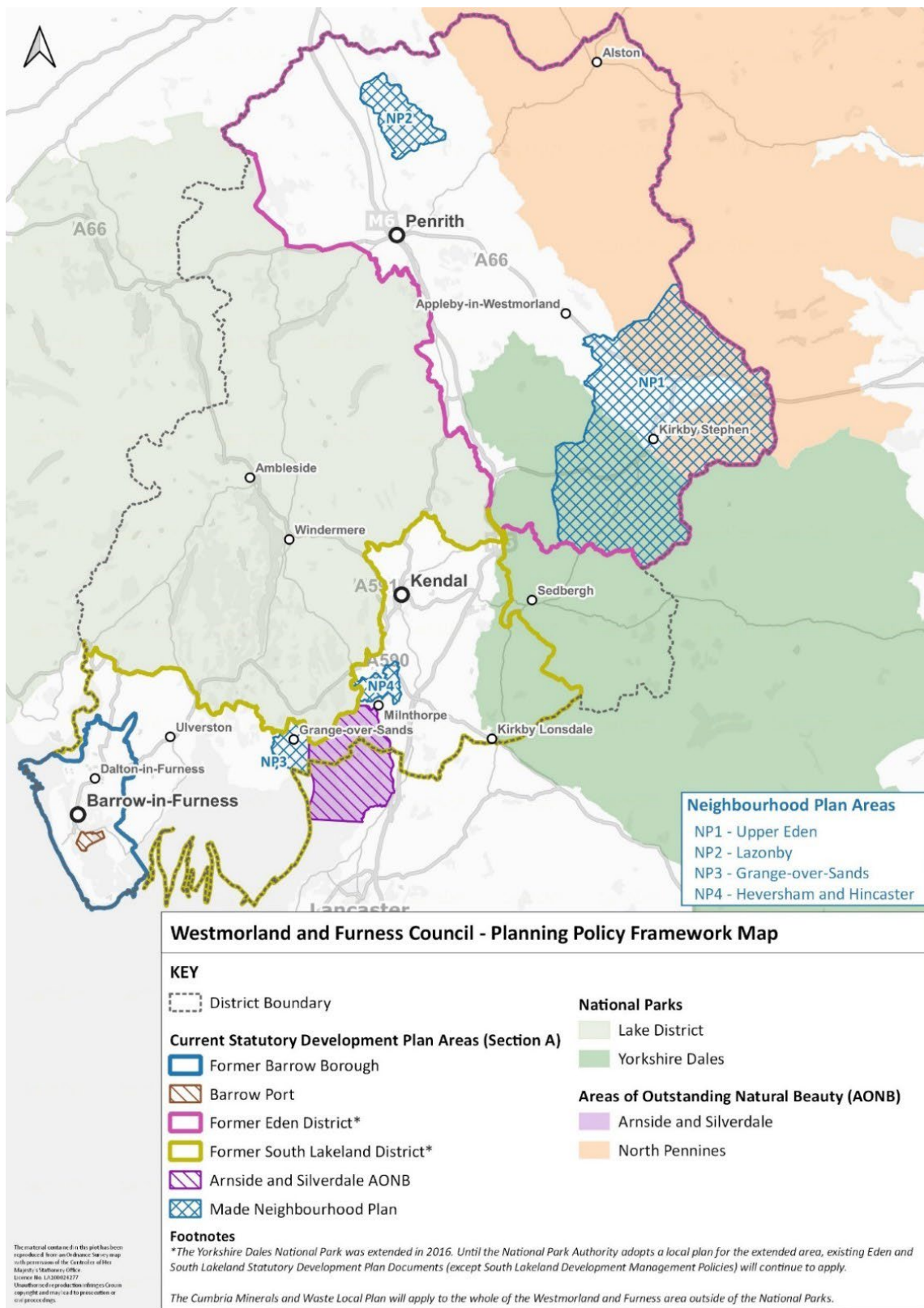
Westmorland and Furness Local Plan

- 1.7.** Westmorland and Furness is a new council which came into being in April 2023. Local Plans are complicated and take a long time to prepare. So, for now, the Local Plans from the old councils (Barrow, South Lakeland, Eden and Cumbria) will stay in place. The Council will carry on deciding planning applications in line with these existing Local Plans. These existing plans are brought together in a document called the Consolidated Planning Policy Framework.
- 1.8.** The framework also lists other more detailed planning guidance such as development briefs for particular sites and neighbourhood plans prepared by Parish and Town councils.
- [Westmorland and Furness Consolidated Planning Policy Framework \(PDF 1.2MB / 44 pages\)](https://www.southlakeland.gov.uk/media/8390/westmorland-and-furness-consolidated-planning-policy-framework-final-accessible.pdf)¹
- 1.9.** The Council is starting work on a new Local Plan for Westmorland and Furness. When this is adopted, it will replace all the existing Local Plans.
- 1.10.** Large parts of Westmorland and Furness are within the Lake District and Yorkshire Dales National Parks. Here the National Park authorities have their own Local Plans and also deal with planning applications. So the Westmorland and Furness Local Plan will only cover parts of the District outside the National Parks.

¹ <https://www.southlakeland.gov.uk/media/8390/westmorland-and-furness-consolidated-planning-policy-framework-final-accessible.pdf>



Map 1 - Former Local Planning Authorities



2.0 Former Barrow Borough Council area

2.1. Five Year Housing Supply Area

- 2.1.1. The five year housing land supply applies to the area covered by the Barrow Borough Local Plan 2016-2031 (see Map 1). The Local Plan was adopted in June 2019. It sets a requirement for a minimum of 119 net additional dwellings to be built in the Borough over the Plan period 2016/17 to 2030/31.
- 2.1.2. The key purpose of this Housing Land Statement is to identify sufficient deliverable housing sites to provide housing over the next five year period (the five year supply). This document has a base date of 31st March 2023, meaning that it assesses the five year housing land supply at that point in time.

2.2. Maintaining supply and delivery

- 2.2.1. The NPPF (2021), Paragraph 74, states that:

“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.”

2.3. Housing Delivery Test

- 2.3.1. Alongside the NPPF (2021) is the Housing Delivery Test Measurement Rule Book. The housing delivery test is an annual measurement of housing delivery in the area.
- 2.3.2. The delivery test is a percentage measurement of the number of net homes delivered against the number of homes required. The document identifies the methodology for calculating the number of homes required, however the Council has used an alternative methodology when calculating housing need in its Local Plan (which takes into account employment growth in the Borough).
- 2.3.3. When deciding which of these two figures to use (the need figure in the Local Plan or the need figure produced by the standard methodology) paragraph 12 of the Rulebook notes “Where the latest adopted housing requirement figure is less than five years old, or has been reviewed and does not need updating, the figure used will be the lower of either the latest adopted housing requirement...OR the minimum annual local housing need figure” (i.e. the one produced by the standard methodology).
- 2.3.4. The “minimum annual local housing figure” produced by the standard methodology is 0, whilst the latest adopted housing requirement is 119 dwellings per annum. 119 is the figure that is used to calculate the Borough’s five-year supply of deliverable housing sites in accord with paragraph 74 of the NPPF (2021).



2.4. Past Housing Delivery

Table 2: Past Housing Delivery in Barrow Borough

Year	Total Permissions (dwellings)	Permissions on unallocated sites (dwellings)	Net Completions (dwellings)	Demolitions (dwellings)	Housing Market Renewal Demolitions (dwellings) ^[1]	Net Additional Dwellings	Basic annual Housing Requirement (dwellings) ^[2]	Shortfall against requirement since start of plan period
2003/04	225	84	118	54	54	64	-	-
2004/05	167	164	94	0	0	94	-	-
2005/06	180	103	165	67	65	98	-	-
2006/07	100	90	113	12	4	101	-	-
2007/08	175	167	99	26	0	73	-	-
2008/09	140	140	77	2	0	75	150*	-
2009/10	138	81	65	14	0	51	150*	-
2010/11	28	28	124	43	40	81	150*	-
2011/12	102	104	52	123	121	-71	150*	-
2012/13	97	97	55	11	10	44	-	-
2013/14	77	77	76	3	0	73	-	-
2014/15	39	39	117	1	0	116	-	-



Year	Total Permissions (dwellings)	Permissions on unallocated sites (dwellings)	Net Completions (dwellings)	Demolitions (dwellings)	Housing Market Renewal Demolitions (dwellings) ^[1]	Net Additional Dwellings	Basic annual Housing Requirement (dwellings) ^[2]	Shortfall against requirement since start of plan period
2015/16	353	324	91	0	0	91	-	-
2016/17	72	72	68	1	0	67	119	52
2017/18	416	422 ^[3]	98	0	0	98	119	21
2018/19	127	127	122	0	0	122	119	-3
2019/20	118	20	103	0	0	103	119	16
2020/21	15	15	88	0	0	88	119	31
2021/22	107	55	178	0	0	178	119	-59
2022/23	18	18	106	0	0	106	119	13
Total	2694	2227	2009	357	294	1652	-	71
Average	135	111	100	18	15	83	-	-

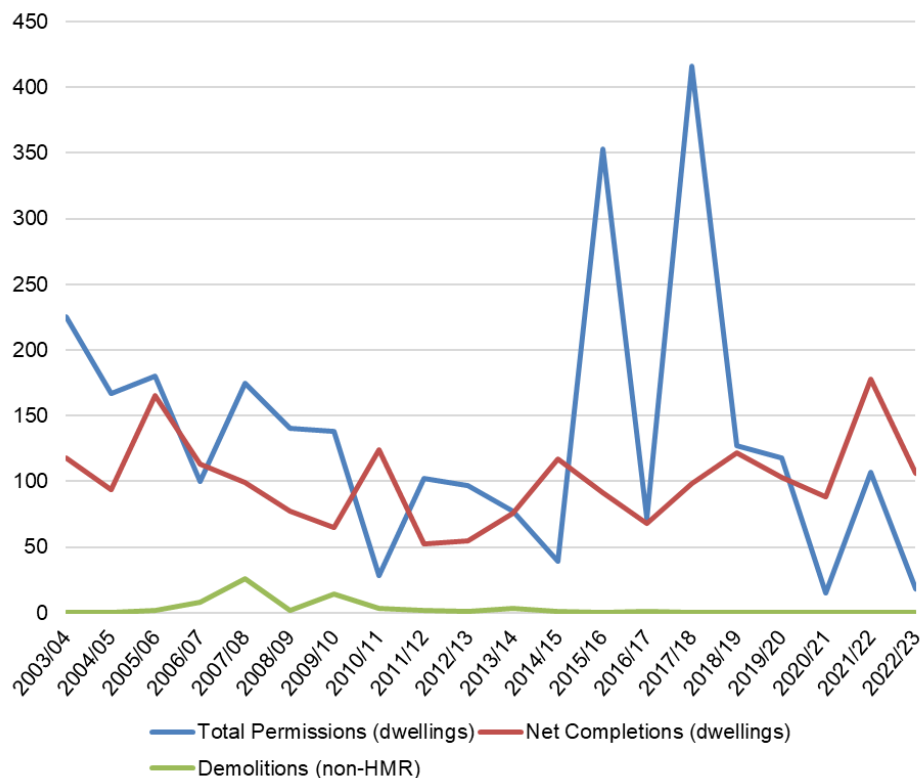
^[1] See Paragraph 3.4

^[2] Before shortfall and any required buffer is added. See pages 23 & 24 for further information.

* Former RSS target



Figure 1: Annual Housing Permissions, Completions and Non-Housing Market Renewal Demolitions in Barrow Borough



Planning Permissions

- 2.4.1. Table 2 and Figure 1 above show that between 2003/04 and 2022/23, the annual number of dwellings granted planning permission each year has ranged between 15 and 416. On average, 135 dwellings per year have been granted permission.
- 2.4.2. Over this period 83% of dwellings granted planning permissions were on unallocated sites. Since the start of the plan period in 2016, the figure was 84%. The number of permissions on windfall sites has been relatively high due to the number of brownfield sites which have become available through conversion of larger properties and through the demolition of former commercial and industrial sites.

Housing Completions

- 2.4.3. Between 2003/04 and 2022/23, the annual net number of dwellings completed each year has ranged between 52 dwellings and 178 dwellings. On average 100 dwellings have been completed each year. Since 2003/04 when monitoring began, the majority of dwellings built have been on windfall sites. Table 5 looks at windfall completions in more detail.



Demolitions

- 2.4.4. The number of demolitions per year historically has had a significant effect on the number of net additional dwellings. The Council has demolished a large number of homes through its Housing Market Renewal programme. However, there are no intentions at present to continue this scheme, therefore the number of demolitions per year is likely to remain relatively stable over the plan period. Table 2 identifies the number of demolitions and shows how many have been linked to the HMR scheme in previous years. Since the HMR programme ended in 2012/13, the average number of demolitions per year has been 0.5.

Net Additional Dwellings

- 2.4.5. Table 2 shows that the number of net additional dwellings was at its peak in 2021/22 (178 dwellings). The figure was at its lowest in 2011/12 when the number of net additional dwellings came to -71. Whilst 52 new dwellings were added to the supply that year, 123 were lost due to demolitions, including 121 to housing clearance under the HMR scheme.
- 2.4.6. On average, the number of net additional dwellings per year is 83. This figure would be higher if housing demolitions linked to the housing market renewal scheme were excluded from the calculations (97 net additional dwellings per annum).

Past Build Rates on Larger Sites

- 2.4.7. Table 3 includes a sample of major housing sites in Barrow, some of which are complete, others which are under construction. The table shows the year when permission was granted and the number of dwellings completed on each site per year according to the Council's monitoring records. In some cases, there have been multiple permissions on the site, therefore the first consent shown in the table may not be the one which was implemented. The table however gives an indication of how many dwellings on average are completed each year on larger sites.
- 2.4.8. The table is based on Building Control completions records. In some cases, the number of dwellings a developer considers to be complete on site may differ slightly as they may have a different definition of "complete".
- 2.4.9. The table shows that delivery rates between sites differ significantly, with the average number of dwellings completed on each site ranging from 2 per year to 22. The highest number of dwellings completed on a single site in one year was 38 at Solway Drive in 2021/22.



Table 3: Historic Build Rates on Sites over 10 units – Barrow Borough

Site Name	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	Annual Average	Dwellings left to complete
Listers North, Barrow*	9	18	26	10	12	13	12	14	9	26	2	4	0	0	6	1	6		10	0
Holbeck Phase 3, Barrow		5	15	13	14	5	5	6	4	17	12	5	5						9	0
Roose Garden Centre, Barrow*									1	1	1	3	5	1	5	2	2	4	3	1
Channelside/ Strand Engineering, Barrow							Feb						5	1	1	0	0	3	2	47
Land off Sherborne Avenue, Barrow*										Oct			7	21	15	6	12	4	11	5
Former Parkview School, West Avenue, Barrow*											Jun			2	2	7	13	10	7	34
Meadowlands Avenue, Barrow													Apr	29	15				22	0



Site Name	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	Annual Average	Dwellings left to complete
Former Abbotsmead Primary School, Friars Lane, Barrow*													Sep				9	2	6	8
Former Bevan House, Barrow*													Dec			1	6	0	2	11
Cemetery Cottages Club, Schneider Rd, Barrow													Mar				3	9	6	0
Land at Arthur Street, Barrow														Nov	14	16	17	2	12	10
Land at Crompton Drive, Dalton														Dec	3	3	3	0	2	2
Dalton Lane, Barrow															May	7	21	16	15	98
Land at Solway Drive, Barrow															Aug	5	38	13	19	2
Land at Lots Road, Askam (South Site)																	2 (Apr)	5	4	22
Land Opposite Greenhills Pond, Dalton																	6 (Nov)	5	6	25



Site Name	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	Annual Average	Dwellings left to complete
Land at Lots Road, Askam (North Site)																		5 (Sep)	5	18

Key:

Red shows the date the first planning consent was granted (this may not necessarily be the permission which was implemented),

Green shows post-approval stages (i.e. lead in times between approval and the first completions).

* Sites being developed by the same developer

Monitoring Year and number of dwellings completed (according to Building Control Completion records).



2.5. The Five Year Housing Land Supply

2.5.1. The NPPF (2021), paragraph 74, requires Local Authorities to:

“Identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies...”

“The supply of specific deliverable sites should in addition include a buffer (moved from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or
- b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
- c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.”

2.5.2. Under delivery, according to paragraph 76 of the NPPF (2021), is measured against the Housing Delivery Test, where this indicates that delivery was below 95% of the housing requirement. The figure used will be the lower of either the latest adopted housing requirement...OR the minimum annual local housing need figure (i.e. the one produced by the standard methodology) according to the Housing Delivery Test Rulebook.

2.5.3. Councils have the option to have their five year supply position “agreed” preventing challenges on the issue at appeal. Paragraph 75 of the NPPF (2021) states that:

“A five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan, or in a subsequent annual position statement which:

- a) has been produced through engagement with developers and others who have an impact on delivery, and has been considered by the Secretary of State;
- b) incorporates the recommendation of the Secretary of State, where the position on specific sites could not be agreed during the engagement process.”

What is a Deliverable Site?

2.5.4. The NPPF (2021) Glossary states that:

“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. In particular:

- a) sites which do not involve major development and have planning permission, and all 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 (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

2.5.5. This definition differs slightly from that found in the previous NPPF (2012) and there is now more of an onus on Council’s to demonstrate deliverability of sites without permission.

What Type of Sites are Included in the Supply?

2.5.6. The Borough’s five year housing land supply contains various types of sites, as shown in Table 4 below.

Table 4: Types of Sites included in the supply

Site Type	Notes	Relevant Page
Sites with extant permission for housing at end March 2023	This group of sites is based on Council monitoring records. A number of sites are excluded which may have extant planning permission but where delivery has stalled and no progress has been made over previous years.	Page 20 & Appendix A
Local Plan Housing Allocations	Sites allocated for development within the Local Plan – indicative housing yields shown in the Plan have been used to calculate delivery although they may differ when a planning application is submitted.	Pages 20, 21 & Appendix B
Windfall allowance for sites over 0.1 hectares.	The future windfall allowance is based on past trends.	Pages 16-18
Windfall allowance for sites under 0.1 hectares	The future windfall allowance is based on past trends.	Pages 16-18



How are future build rates estimated?

- 2.5.7. There is always an element of uncertainty when calculating how many dwellings will be completed on individual sites in future years. Estimates are made based on past trends and, where appropriate, developer's phasing schemes.
- 2.5.8. Developers have been contacted with regards to sites over 0.1 hectares in the supply to determine how many dwellings they expect to complete each year over the 5 year period. Where such information has been provided this is noted in Appendices A and B (list of extant permissions and housing site allocations).
- 2.5.9. Where this information is unavailable, an average of 10 dwellings per year per site has been used when projecting future build rates. This is based on the mid-point between the highest and lowest average number of dwellings completed on an individual site in a single monitoring year (See Table 3).

Is a non-implementation rate applied?

- 2.5.10. A number of Councils deduct a percentage of dwellings from their supply (often 10%) to take into account the fact that not all planning permissions are implemented. National policy however does not state that this is required and whilst the Council must identify a supply of deliverable sites, whether the market chooses to deliver them is out of the control of local authorities.
- 2.5.11. This stance of not applying a non-implementation rate has been supported on appeal (APP/A0665/A/14/2214400; APP/A0665/A/14/2224763).
- 2.5.12. When calculating the housing land supply, the Council considers each site with extant permission in turn, taking into account when permission will expire, whether development has started, whether it has stalled (and if so why) and whether the consent has been superseded by a permission for, or is being marketed for, an alternative use.
- 2.5.13. Appendix C identifies a number of sites with extant permission where there are doubts over whether the development will be completed e.g. because the development has not progressed for a number of years and no delivery timescales have been received from the developer or there is other evidence that the permission is unlikely to be implemented. Whilst these sites meet the definition of "deliverable", a cautious approach has been taken and the sites have been excluded from the supply. Such sites are listed in Appendix C.
- 2.5.14. Given the above, it is not considered necessary to reduce the supply to take into account non-implementations.



How is the future windfall allowance estimated?

- 2.5.15. Windfall sites are those that have not specifically been identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available.
- 2.5.16. The NPPF (2021), paragraph 71, states that:
- “Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.”
- 2.5.17. The past delivery rate on windfall sites demonstrates that these have been a reliable source of housing over recent years. Table 5 shows how many dwellings have been completed on windfall sites, above and below 0.1 hectares, since 2007/08. It shows that the majority of completions over that period (69%) have been on windfall sites. Since the start of the plan period, 75% of completions have been on windfall sites.
- 2.5.18. 26% of all completions since 2007/08 have been on small windfall sites below 0.1 hectares in size and 42% on windfall sites over 0.1 hectares.
- 2.5.19. The number of windfalls is likely to be high due to the following reasons:
- Economic restructuring in the Borough has resulted in the release of a number of brownfield sites and continues to do so,
 - The promotion of brownfield sites in both previous and current national planning policy,
 - The conversion and sub-division of former commercial units to meet the demand for rented accommodation (including smaller flats and Houses of Multiple Occupation).
- 2.5.20. Local Authorities must consider whether past trends are likely to continue into the future and to what extent windfall sites will continue to come forward for development.
- 2.5.21. Table 5 and Figure 2 strongly indicate that windfall development is likely to continue whilst new allocations are coming forward, although in the longer term there may be a reduction in the number of developments on larger windfalls sites when completions on newly allocated sites reach their peak.
- 2.5.22. It is also anticipated that development will continue to come forward on industrial sites which may become available unexpectedly, conversions from other uses and the sub-division of properties, particularly taking account of the major development and expansion taking place by BAE Systems at the Port of Barrow.



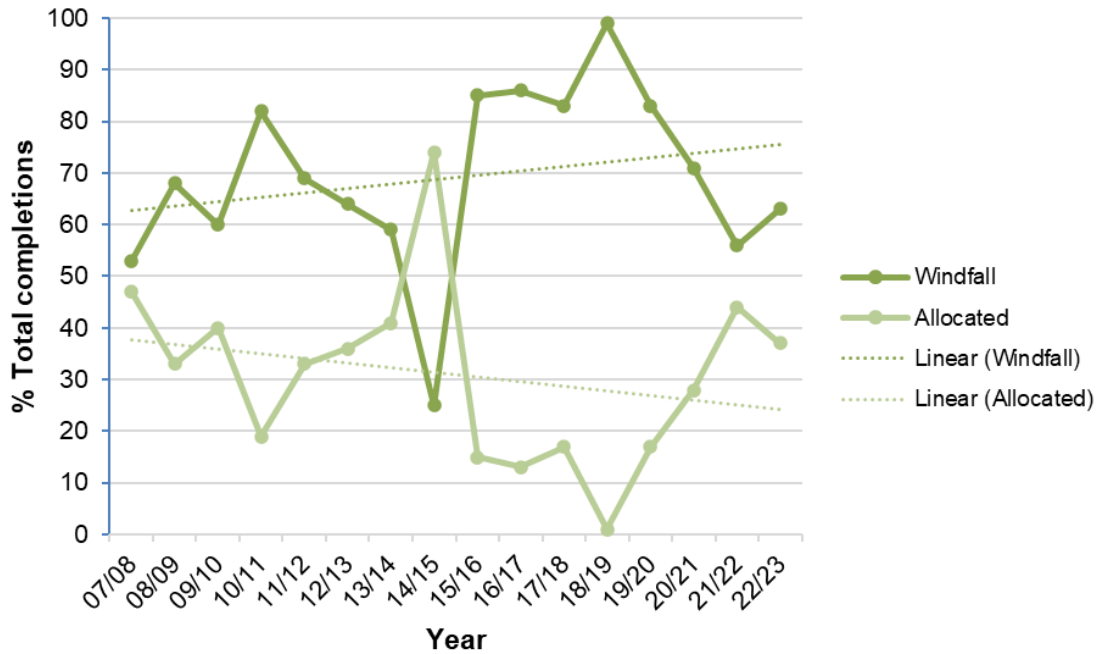
2.5.23. Taking into account the data in Table 5, a rate of 25 dwellings is applied on windfall sites under 0.1 hectares and a rate of 40 dwellings is applied on windfall sites over 0.1 hectares in years 3-5. To avoid double counting no windfall allowance is applied to years 1 and 2 of the 5 year period.

Table 5: Windfall Completions

Year	Net Comps	Comps on windfall sites under 0.1 ha	% of total comps that year	Comps on windfall sites over 0.1 ha	% of total comps that year	Comps on allocated sites	% of total comps that year
07/08	99	23	23%	30	30%	46	47%
08/09	77	37	48%	15	20%	25	33%
09/10	65	26	40%	13	20%	26	40%
10/11	124	31	25%	70	57%	23	19%
11/12	52	11	21%	24	48%	17	33%
12/13	55	18	33%	17	31%	20	36%
13/14	76	26	34%	19	25%	31	41%
14/15	117	30	25%	0	0%	87	74%
15/16	91	20	22%	57	63%	14	15%
16/17	68	22	32%	37	54%	9	13%
17/18	98	39	40%	42	43%	17	17%
18/19	122	37	30%	84	69%	1	1%
19/20	103	8	8%	77	75%	18	17%
20/21	88	30	34%	33	37%	25	28%
21/22	178	23	13%	76	43%	79	44%
22/23	106	20	19%	47	44%	39	37%
Total	1519	401 (26%)	-	641 (42%)	-	477 (31%)	-
Ave.	95	25	-	40	-	30	-



Figure 2: Windfall and Allocated Completions



2.5.24. The Council will continue to monitor the delivery of windfall sites through the Housing Land Statement and will make adjustments to the windfall allowance when calculating the supply in future years where necessary.

2.6. The Five Year Housing Land Supply at 31st March 2023

2.6.1. The following table summarises the five year housing land supply at the end of the 2022/23 monitoring period against the housing requirement identified in this document.



Tables 6 & 7: Barrow Borough Housing Land Supply 2023/24-2027/28

Housing Supply 2023/24 to 2027/28

	Extant permissions	Housing Allocations	Windfalls under 0.1ha	Windfalls Over 0.1 hectares	Demolitions	Total 5 year Supply
No. of dwellings	460	101	75	120	-5	751
Relevant Page	Page 20 Appendix A	Pages 20 & 21 Appendix B	Pages 16-18	Pages 16-18	Page 21	

Housing Requirement 2023/24 to 2027/28

	Basic OAN (119 x 5 years)	Shortfall since 2016/17	Additional buffer	Total 5 year Requirement
No. of dwellings	595	71	33	699
Relevant Page	Page 5	Pages 21 & 22	Pages 22 & 23	

Total Housing Land Supply (751/140) = 5.4 years



- 2.6.2. Tables 6 & 7 shows that 766 net additional dwellings are likely to be completed on deliverable sites over the five year period beginning 1st April 2023.
- 2.6.3. Over the same period there is a need for at least 699 dwellings to be built in the Borough, which equates to 140 net additional dwellings per year.
- 2.6.4. This demonstrates that at 31st March 2023, the Council had a 5.4 years supply of deliverable housing sites (751/140).
- 2.6.5. The NPPF (2021) Glossary defines a deliverable site (see paragraph 2.5.1 of this statement). As well as sites which are considered to be deliverable in principle, this definition also sets out the sites which would require further evidence to be considered deliverable, namely those which:
- have outline planning permission for major development;
 - are allocated in a development plan;
 - have a grant of permission in principle; or
 - are identified on a brownfield register.

Sites with Extant Permission

- 2.6.6. 60% of dwellings within the 5 year housing land supply already benefit from planning permission and are deliverable. A full list of sites with extant permission and the number of dwellings each contributes to the supply is included in Appendix A.
- 2.6.7. As Appendix A shows, development has commenced on the majority of these sites and in some cases developers have submitted details of the anticipated numbers of completions over the 5 year period.
- 2.6.8. A number of sites benefit from planning consent but have not been included in the housing land supply as development has not progressed for a number of years. These sites are shown in Appendix C.

Housing Allocations

- 2.6.9. A list of housing allocations which are included within the supply (and which don't currently benefit from planning permission), in full or in part, can be found in Appendix B.
- 2.6.10. A list of evidence to support the inclusion of these sites in the supply can be found in Appendix B. Constraints to development are listed in the Council's Proposed Housing Site Assessments document and have been considered when assessing the site's deliverability.
- 2.6.11. When determining how many dwellings are likely to be completed on such sites within the 5 years consideration is given to how long it would take to gain planning consent and deal with any constraints and pre-commencement conditions.



- 2.6.12. Delivery timescales from developers are used where these have been provided and where this is the case this is noted in Appendix B. Where this information is not available, an estimation of lead in times has been made. Generally two years lead in time has been allowed, with dwelling completions in years 3-5 in most cases.

Demolitions

- 2.6.13. An allowance needs to be made for future demolitions which affect the number of net additional dwellings. Past demolition trends are discussed on pages 8 and 9.
- 2.6.14. The average number of homes demolished each year since the housing market renewal scheme ended (which saw large scale demolitions) is 0.5. This figure has been rounded up to 1 dwelling and will be projected forward over the emerging Plan period.

2.7. Shortfall since the start of the plan period

Shortfall in Delivery

- 2.7.1. In assessing future housing need, authorities should not add any “backlog” or shortfall between housing delivery and targets set within previous plans, for example where past housing development has under delivered against former RSS targets.
- 2.7.2. This was confirmed in a High Court judgement:
“...There was no methodological error in the way these competing estimates for the period 2012-2031 were drawn up by reason of the notional “shortfall” in housing delivery between 2006 and 2011 by comparison with the average annual figure for additional housing indicated in the South East Plan...there was no reason whatever for a person in 2011 seeking to draw up a current estimate of population growth and housing requirement looking into the future from that date to 2031 and using up-to-date evidence to do so, to add on to the estimated figures any shortfall against what had been estimated to be needed in the first phase of the previously modelled period included in the South East Plan.” (Zurich Assurance Limited v Winchester City Council and South Downs National Park Authority (2014) EWHC 758 (Admin) 18th March 2014).
- 2.7.3. Several other cases also suggest that the former housing requirement, set out in the Regional Strategy is no longer relevant (Huston Properties Ltd (2013) EWCA Civ 1610 (2014) JPL 599, Kay and Ryder LJJ, Sir David Keane; R (Smech Properties Ltd) v Runnymede Borough Council (2015) EWHC 823 (Admin), Patterson J; South Northamptonshire Council V SOS (2014) EWHC 573 (Admin) Ousley J).
- 2.7.4. In accord with the NPPG (Reference ID: 68-031-20190722), the level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgfield approach), then the appropriate buffer should be applied. In accord with this guidance, the Council uses the Sedgfield method.



2.8. Housing Delivery Test

- 2.8.1. In July 2018 the Government introduced the Housing Delivery Test. The delivery test compared the number of net homes delivered against the number of homes required.
- 2.8.2. The Housing Delivery Test Rulebook identifies the methodology for calculating the number of homes required, however the Council has used an alternative methodology when calculating housing need in its Local Plan (which takes into account employment growth in the Borough).
- 2.8.3. When deciding which of these two figures to use when carrying out the test (the need figure in the Local Plan or the need figure produced by the standard methodology). Paragraph 12 of the Rulebook notes “Where the latest adopted housing requirement figure is less than five years old, or has been reviewed and does not need updating, the figure used will be the lower of either the latest adopted housing requirement...OR the minimum annual local housing need figure (i.e. the one produced by the standard methodology).”
- 2.8.4. Where the test indicates that housing delivery has fallen below 95% of this figure then Councils are required to prepare an Action Plan to assess the causes of under-delivery and identify remedial actions.
- 2.8.5. Where the test indicates that housing delivery was less than 75% of this figure over the previous three years then Paragraph 11 of the NPPF (2021) states that the policies “which are most important for determining an application are out-of-date” when determining housing applications.

Requirement for an additional buffer

- 2.8.6. The NPPF (2021), paragraph 74 states:

“The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

 - a) 5% to ensure choice and competition in the market for land; or
 - b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
 - c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.”
- 2.8.7. Footnote 41 of the NPPF (2021) states that “this will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement.”



2.8.8. The Housing Delivery Test results, published 2022, confirm that there is no requirement for the authority to add a 20% buffer. A 5% buffer is however required under criterion a.

2.9. Conclusions

- 2.9.1. Local Planning Authorities are required to identify a 5 year supply of deliverable sites against their housing requirement.
- 2.9.2. The housing requirement is for a minimum of 119 net additional dwellings to be added to the Borough's housing stock each year over the period 2016/17 to 2030/31.
- 2.9.3. When calculating the 5 year housing land supply, previous shortfall in delivery that has occurred since 2016 (the start of the plan period) has been added. The Council has used the "Sedgefield methodology" when calculating the shortfall. A 5% buffer, as required by the NPPF (2021), has also been added.
- 2.9.4. This document has identified a 5.4 year supply of deliverable housing sites (see Tables 6 & 7) which equates to 751 dwellings.
- 2.9.5. The supply is considered to be robust and a cautious approach has been taken when deciding which sites to include within it.
- 2.9.6. Local planning authorities are also assessed against the government's housing delivery test.
- 2.9.7. The Housing Delivery Test Rulebook indicates that when carrying out the test the lower of the adopted housing requirement and minimum housing need figure (using the standard methodology in the rulebook) should be used. The minimum annual housing need figure (0 dwellings) is lower than the adopted housing requirement (119 dwellings).
- 2.9.8. Given that delivery has exceeded this figure since the start of the plan period, there is no requirement to add a 20% buffer or produce an Action Plan as confirmed by the Housing Delivery Test results produced in 2022.



3.0 Former Eden District Council area

3.1. Five Year Housing Land Supply Area

- 3.1.1. The five year housing land supply applies to the area covered by the Eden Local Plan 2014-2032 (see map in Appendix K). At the time of the adoption of the Local Plan (October 2018) this was the entirety of the former local planning authority area of Eden District and also the areas of the Lake District and Yorkshire Dales National Parks that were created in August 2016. In May 2021 the Lake District National Park adopted a new Local Plan which superseded the Eden Local Plan and therefore the five year housing land supply no longer applies to the Lake District National Park extension area.

3.2. Five Year Housing Land Supply Position

- 3.2.1. This section sets out the local planning authority's five year housing land supply position as at 31 March 2023 with reference to the housing requirement of 242 dwellings in the Eden Local Plan (2014 – 2032) adopted in October 2018.
- 3.2.2. The method for calculating the figure using was agreed during the examination of the Local Plan and is set out in the Five Year Housing Land Supply Statement.
- 3.2.3. The five year housing land position uses information from the annual survey of permissions and completions with 31 March 2023 as the relevant base date.

Buffer and backlog

- 3.2.4. The 2018 Five Year Housing Land Supply Statement acknowledged a persistent under delivery of housing within Eden and as such incorporated a 20% increase to the undersupply (at 31 March 2018 there was an undersupply of 196 dwellings since 1 April 2014) and housing requirement.
- 3.2.5. In the 2018 Statement the land supply was calculated using the Sedgefield method, which involves adding any shortfall of housing in the Local Plan from previous years over the next five years of the plan period. Since 2018, delivery of housing has exceeded the annual requirement of 242 set out in the Local Plan and as a consequence there is currently no undersupply of housing.
- 3.2.6. The supply of specific deliverable sites should include an appropriate level of buffer to ensure choice and competition in the market for land. Following the introduction of the 2021 NPPF the appropriate level of buffer is determined on the basis of the Housing Delivery Test (HDT), and as a minimum the land supply assessment should include a buffer of 5% to account for market fluctuations.
- 3.2.7. The NPPF requires a 20% buffer where there has been a significant under delivery of housing over the previous three years, defined as delivery below 85% of the housing requirement using the Housing Delivery Test. The Council has significantly and consistently exceeded the threshold (see Table 8, therefore applying a 20% buffer is no longer appropriate and only a 5% buffer is required.



Table 8 – Housing Delivery Test Measurement 2022

Year	Housing Delivery Test Measurement (%)
2018	194
2019	229
2020	313
2021	367
2022	391

Assumptions

- The most recent Housing Delivery Test determined that a five percent buffer will be applied to the five year housing land supply.
- The 20% buffer applied to earlier versions of the five year housing land supply to account for the shortfall in housing delivery is no longer appropriate.

Deliverability

- 3.2.8. The five year housing land supply must consist of specific deliverable sites as required by §77 of the NPPF (December 2023). The Council has determined the sites to be included with the five years’ supply having regard to the definition of ‘deliverable’ in the NPPF, the current planning status of sites and their prospects of implementation within the next five years.
- 3.2.9. For sites delivering over three dwellings evidence of intention to deliver units on the site is determined through applications to discharge conditions and recent activity on site.
- 3.2.10. In addition, the delivery of major developments (10 or more dwellings) is informed by information provided by agents, developers and landowners collected between July and October 2023.
- 3.2.11. In line with the NPPF and PPG the Council only includes sites allocated in the development plan or major development sites with outline permission in the five year supply where it has clear evidence that they are deliverable and that completions will begin on site within five years.
- 3.2.12. Sites delivering three or fewer dwellings are assumed to be deliverable within 5 years until the permission is implemented or it expires. Where planning permission on site has been implemented, Building Control records are used to determine whether work on site is ongoing and when units will be delivered or whether progress has stalled.



Nutrient Neutrality

- 3.2.13. On 16 March 2022 Eden District Council received a letter from Natural England concerning nutrient pollution in the protected habitats of the River Eden Special Area of Conservation (SAC). The letter advised that within identified catchment areas of these protected habitats certain types of new development such as housing have the potential to cause adverse impacts through nutrient pollution.
- 3.2.14. The Conservation of Species and Habitats Regulations 2017 require local planning authorities to ensure that new development does not cause adverse impacts to protected habitats prior to granting planning permission. As a result, when determining planning applications, we must now ensure that relevant developments within the identified catchment areas do not increase nutrient levels, and such development can only proceed if it can be demonstrated to be 'nutrient neutral'.
- 3.2.15. Achieving nutrient neutrality for large sites can be complex. Sites of four or more dwellings have only been included in the supply where the LPA has found the proposed mitigation to be acceptable. Where the mitigation is proposed to be off-site, the development site is only included in the supply where a suitable mitigation site has been identified.
- 3.2.16. For smaller sites the mitigation solutions are less complex. A total of 53 dwellings have been approved on sites of fewer than 4 dwellings between 1st April 2022 (the month following the announcement of nutrient neutrality) and 31st October 2023. Of the sites located within the catchment area of the River Eden SAC 26 sites (a total of 30 dwellings) did not require a mitigation solution to be implemented, either because the proposal did not increase the overnight accommodation, the application was a resubmission of an extant permission or the application met the criteria in Annex F to the Natural England Guidance (March 2022) and was therefore exempt from providing mitigation. 8 sites (a total of 9 dwellings) required mitigation of which 6 proposed a package treatment plant (3 of those combined with tree planting).
- 3.2.17. As Tables 9 and 10 show, monthly approval rates were lower than average between April 2022 and June 2023. However in recent months, July, August and October 2023 specifically, approval rates have returned to normal levels. The 8 applications of 1-3 dwellings approved with mitigation measures were all approved since 1st June 2023, five of which were submitted the previous year. This indicates that mitigation solutions for small sites are now achievable as these sites are now being approved as normal. As a result sites of fewer than 4 dwellings are included in the supply (the total figure is discounted by 25% to account for non-delivery as part of the agreed methodology – see paragraph 3.2.43).



Table 9 – Dwellings approved on sites of between 1-3 dwellings (April 2022 – October 2023)

Month	Approvals
October 2023	6
September 2023	1
August 2023	9
July 2023	7
June 2023	4
May 2023	3
April 2023	0
March 2023	5
February 2023	2
January 2023	2
December 2022	1
November 2022	1
October 2022	1
September 2022	2
August 2022	0
July 2022	2
June 2022	5
May 2022	0
April 2022	2

Table 10 – Dwellings approved on sites of between 1-3 dwellings (April 2014 – March 2023)

Year	Approvals	Average monthly rate
1/04/2022-31/03/2023	22	1.83333333
1/04/2021-31/03/2022	74	6.16666667
1/04/2020-31/03/2021	69	5.75
1/04/2019-31/03/2020	75	6.25
1/04/2018-31/03/2019	96	8
1/04/2017-31/03/2018	109	9.08333333
1/04/2016-31/03/2017	119	9.91666667
1/04/2015-31/03/2016	76	6.33333333
1/04/2014-31/03/2015	93	7.75

Assumptions

- Sites of four or more dwellings are only included in the supply where the proposed nutrient neutrality mitigation measures have been considered acceptable by the LPA.
- Sites of fewer than four dwellings are included in the supply with the 25% non-delivery discount agreed by the Inspector at the Eden Local Plan examination.



Build-out rates and lead-in times

- 3.2.18. For significant sites (four or more dwellings) individual assumptions on lead-in and build-out rates are made on a site by site basis taking account of progress to date in bringing the site forward, and any information provided by site owners, agents and developers. It is considered that those with an interest in developing a site are best placed to advise on likely build-out and lead-in times.
- 3.2.19. We have made every effort to obtain information on site delivery from site owners, agents and developers but we haven't succeeded for every site. For sites where specific information hasn't been provided on build-out and lead-in rates, assumptions have been made based on past data, in some cases in conjunction with a site visit.
- 3.2.20. In general, sites with outline permission will take slightly over 3.5 years to start delivering dwellings and those with detailed permission will take approximately 2-3 years to start delivering dwellings. Table 11 shows median and average lead-in times based on sites approved from 2003 to 2021, details of which are contained in Appendix I (Table 19).
- 3.2.21. Recent activity discharging pre-commencement conditions is also taken into account when determining lead-in times as an indication that the developer is preparing to begin on-site operations.

Table 11 - Average and Median Lead-In Times

Location	Application Type	Median time from approval to delivery of first dwelling (years)	Average time from approval to delivery of first dwelling (years)
Penrith	Outline permission	3.5	3.8
Penrith	Detailed permission	1.7	2.1
Outside Penrith	Outline permission	3.8	3.7
Outside Penrith	Detailed permission	2.1	3.1
All	Outline permission	3.8	3.8
All	Detailed permission	1.9	2.6

- 3.2.22. Build out rates vary depending on the location and developer. Large sites (of more than 20 dwellings) generally deliver at the highest rate per year, around 20 dwellings per year. Table 12 shows average and median build-out rates based on dwelling completions from 2004 to 2023, details of which are contained in Appendix I (Table 20).
- 3.2.23. There are however a number of caveats relating to this analysis which make relying on simple averages problematic, especially for smaller sites. Firstly calculating averages means that outlier figures for years at the beginning or end of a site build can skew the figures downwards, for example if a site starts or finishes delivering completions partway through a monitoring year. This can result in low single figure



build rates which are unrepresentative of the actual build rates when a site is mid build. Secondly the Council's completion monitoring has historically relied solely on Building Control completion certificate records, and this can result in delays to completions being recorded, even though homes may be finished on site. In some cases the completions records have shown zero completions in some years and this does not reflect reality on the ground.

Table 12 – Average and median build-out rates

Total net dwellings on site	Average dwellings delivered per year	Median dwellings delivered per year
4-9	3.6	4
10-19	5.9	5.2
20+	20	19

- 3.2.24. Each site has been considered individually to assess how many dwellings it may deliver until 31 March 2028. Where sites have started, Building Control inspection records can indicate how close to each unit on a site, along with past build rates, it is possible to determine a robust estimate of when a site will deliver housing.
- 3.2.25. Where site construction hasn't started or there have been no inspections by Building Control it is more difficult to gauge when units will be delivered. The average lead in times and build out rates in Tables 11 and 12 respectively are used as starting point then adjusted based on site characteristics. For example, sites in larger settlements (eg Appleby and Penrith) and in settlements close to Penrith (eg Temple Sowerby and Clifton) tend to have higher build out rates than smaller and more remote settlements.

Assumptions

Lead-in and build-out rates are considered on a site-by-site basis for sites over three dwellings and where possible information obtained from site owners, agents and developers is used to determine when dwellings on the site will be delivered.

Past data trends are used to determine lead-in times; slightly over 3 years from outline consent to delivery of first dwelling and 2-3 years from detailed consent to delivery of first dwelling.

The location and past performance of the developer of a site are considered when estimating build-out rates, along with past trends based on site size; 3-4 dwellings per annum for sites of 4-9 dwellings, 5-6 dwellings per annum for sites of 10-19 dwellings, and up to 20 dwellings per annum for sites over 19 dwellings.



Windfall

- 3.2.26. The five year land supply includes a windfall allowance (i.e. a projection of unanticipated sites being developed), reflecting sites which come forward outside the allocation process. This approach was supported by the Local Plan Inspector. The 2012 NPPF, which provided the basis for the Local Plan examination, allowed for the inclusion of windfall sites in the five year land supply, where compelling evidence can demonstrate that the supply of these sites will be maintained. The test for windfall sites in the 2023 NPPF is not materially different from that in the 2012 NPPF; there should be compelling evidence that they will provide a reliable source of supply.
- 3.2.27. As a largely rural authority, much of our housing has been developed on small sites or non-allocated sites. Looking at past completions, we can estimate the likely windfall provision in the next five years. Following guidance in the 2023 NPPF, we have determined our past windfall trends by removing allocations from the 1996 Eden Local Plan and the current Local Plan, any site considered suitable in the Strategic Housing Land Availability Assessment [SHLAA] (most recently updated in 2015) and sites developed in residential gardens.
- 3.2.28. The Local Plan Inspector agreed that a windfall allowance of 50 dwellings per annum was appropriate, and the evidence from past completions indicates that this is still the case. The analysis excludes sites of five or more dwellings (the threshold for the 2015 SHLAA) with the aim of disregarding sites that may be included in the current or any future SHLAA.
- 3.2.29. Table 13 demonstrates that windfall completions over the past nine years have only occasionally dropped below 50 dwellings. Windfall completions have averaged 54.6 dwellings per year over the last five years, slightly higher than the previous five year period.

Table 13 – Annual Windfall Completions

Date	Windfall on sites <5 dwellings	Total completions	Percentage of windfall on sites <5 dwellings	5 year average
April 2014 – March 2015	51	140	36%	
April 2015 – March 2016	43	265	16%	
April 2016 – March 2017	54	199	27%	
April 2017 – March 2018	38	190	20%	
April 2018 – March 2019	66	302	22%	50.4
April 2019 – March 2020	71	363	20%	54.4
April 2020 – March 2021	57	264	22%	57.2
April 2021 – March 2022	35	316	11%	53.4
April 2022 – March 2023	44	385	11%	54.6
Total	323	2424	63%	



3.2.30. To avoid double counting commitments in the supply, as we assume that all completions that will be recorded in the next two years already have permission, the windfall allowance is only applied to the final three years of the five year period, giving a total of 150 dwellings.

3.2.31. Windfall units continue to make an important contribution to the district's housing supply and in 2021/22, out of a total of 174 dwellings that were granted planning permission, 63 were on windfall sites, amounting to 36%. In 2022/23 only a small number of permissions were granted due to nutrient neutrality however recent figures show small site approval levels are returning to normal (see paragraphs 3.2.13 to 3.2.17). Table 14 shows windfall permissions in recent years and shows that whilst levels fluctuate windfall sites continue to form a significant proportion of total supply.

Table 14 – Annual Windfall Permissions

Date	Windfall permissions on sites <5 dwellings	Total permissions	Percentage of windfall permissions
April 2014 – March 2015	81	338	24%
April 2015 – March 2016	65	200	33%
April 2016 – March 2017	115	833	14%
April 2017 – March 2018	110	901	12%
April 2018 – March 2019	85	302	28%
April 2019 – March 2020	81	415	20%
April 2020 – March 2021	54	323	17%
April 2021 – March 2022	63	174	36%
April 2022 – March 2023	27	30	90%
Total	681	3516	19%

3.2.32. For a number of reasons windfall sites form a key part of the housing supply in the district, one such reason being the increase in permitted development rights, nationally, which permits the creation of residential units through conversions from other uses. The Local Plan also provides the opportunity for a potential increase in small windfall sites in rural areas through its more flexible approach to rounding off and infill in small villages and hamlets.

Components of the Five Year Land Supply Calculation

3.2.33. This section explains the various sources of housing supply that are included in the five year land supply, and section 3.2.48 presents the five year land supply calculation.

Sites with permission

3.2.34. Sites with planning permission (including those with dwellings not started and those under construction) are set out in Appendix F (Tables 9, 10, 12, 13, 15 and 16). The record of progress on development sites is based mainly on building control



records, which monitor the start and completion of dwellings. In some cases there is a delay between the actual completion of a dwelling and the issuing of a completion notice by Building Control. In a few cases information on completions is based on site visits or other up-to-date information such as Council Tax registrations or Gazetteer address data. The housing completions and planning permissions in the report are net figures to take account of (for example) the conversion, redevelopment or demolition of existing dwellings.

Large sites with permission

- 3.2.35. An individual assessment has been undertaken of large sites (four or more dwellings) with planning permission (including sites that are already under construction). Together, at 31 March 2023, these provide a total supply of 1,084 outstanding dwellings (net).
- 3.2.36. The assessment determines the deliverability of sites over the next five years and is based on the planning judgment of planning officers taking into account the analysis of trends and specific development information for each site. This evidence is summarised in Appendix F (Tables 12 and 13). This assessment has concluded that 910 dwellings on large permitted sites are considered deliverable within 5 years.
- 3.2.37. The NPPF states: “where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years.”
- 3.2.38. In the former Eden District sites of 4 or more dwellings have historically been considered large sites (the NPPF definition of ‘major development’ is 10 or more dwellings) when undertaking the five year housing land supply calculation so the Council has applied the definition of ‘deliverability’ in the NPPF to sites of between four and nine dwellings too.

Small sites with permission

- 3.2.39. The NPPF states: “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 schemes will not be implemented 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)”.
- 3.2.40. We have therefore included all extant permissions and all implemented consents of sites under four dwellings. Trends in recent completion data clearly demonstrate the older planning applications still play an important contribution to our housing supply and the age of approvals does not necessarily correlate with the deliverability of schemes. However, to recognise that some may not be completed we have applied a 25% non-completion rate to smaller sites. As a result 238 dwellings on small sites are considered deliverable within 5 years.



Unconsented land allocations

3.2.41. The Eden Local Plan includes a number of site allocations in the Towns and Key Hubs. A number of the Local Plan allocations have live applications and these sites are included in the supply where there is evidence they will be brought forward. These are set out in Appendix F (Tables 11 and 14). Four unconsented Local Plan allocations are included in the supply with a total of 165 dwellings.

Windfall allowance

3.2.42. A windfall allowance of 50 dwellings per year is included in the five year land supply to account for dwellings on small sites that do not yet have consent but, based on past data trends, are likely to come forward in the next five years (see paragraphs 3.2.26 to 3.2.32). To avoid double counting of commitments the windfall allowance is applied to the final three years of the five year supply to give a total of 150 dwellings.

Housing completions

3.2.43. Table 15 sets out completions since the start of the Local Plan period and shows that 2,424 net dwellings have been completed between 1 April 2014 and 31 March 2023. Annual completion rates increased from 2014-15 to 2019-20, other than a spike in 2015-16 due to the completion of a block of flats in Penrith. Although completions in 2020-21 exceeded the Local Plan target the figure was significantly lower than the previous year. This appears to be a direct result of the Coronavirus pandemic. Completion rates have subsequently recovered and total completions remain above the target at this point in the Local Plan period.

Table 15 – Annual Completions

Date	Net number of dwellings completed
1 April 2014 – 31 March 2015	140
1 April 2015 – 31 March 2016	265
1 April 2016 – 31 March 2017	199
1 April 2017 – 31 March 2018	190
1 April 2018 – 31 March 2019	302
1 April 2019 – 31 March 2020	363
1 April 2020 – 31 March 2021	264
1 April 2021 – 31 March 2022	316
1 April 2022 – 31 March 2023	385
Total	2424

3.2.44. The completions information is based mainly on building control records, which monitor the start and completion of dwellings. In some cases there is a delay between the actual completion of a dwelling and the issue of a completion notice and therefore in some cases where the Council is aware that a development is progressing but there are no completion records, other sources of information are used including Council Tax registrations and/or site visits.



Five Year Housing Land Supply Calculation

3.2.45. Based on the deliverable supply of 1,464 units identified above, the Council's five year land supply calculation is as follows.

Table 16 – Housing Requirement

	Housing Requirement	Count	Formula
A	Annual Housing Requirement 1 April 2014 – 31 March 2032	242	
B	Total Housing Requirement 1 April 2014 – 31 March 2032 (18 years)	4356	
C	Net Completions 1 April 2014 – 31 March 2023	2424	
D	Target Completions 1 April 2014 – 31 March 2023	2178	A * 9
E	Difference (Oversupply)	246	C – D
F	5 Year Requirement	1210	A * 5
G	5 Year Requirement + 5% Buffer	1271	G * 1.05
H	Total 5 Year Requirement Less Oversupply	1025	G – E
I	Annualised Requirement over next 5 years	205	H / 5
	Identified Supply		
J	Extant Permissions (Large Sites)	123	
K	Extant Permissions <4 Units	80	
L	Implemented Consents (Large Sites)	787	
M	Implemented Consents <4 Units	158	
N	Allocated Local Plan Sites	165	
O	Windfall Sites	150	
P	Total Number of Units	1464	
Q	Current Land Supply (Years)	7.14	P / I



4.0 Former South Lakeland District Council area

Executive Summary

This document is the 2023 Housing Land Annual Position Statement for South Lakeland District Council outside the National Parks, as at 31 March 2023. It provides an assessment of the 5-year housing land position against the planning area's local housing need using the standard method as required by the National Planning Policy Framework (NPPF). This report represents the Council's up-to-date position statement on 5-year housing land supply.

The Council's five-year housing land supply position as at 31 March 2023 is presented below.

Table 17: South Lakeland 5 Year Land Supply Position using the standard method

Step	Description	Calculation	Figure
a)	Local Housing Need 2023-2033	142 x 10	1420
b)	Plus 5% buffer over period	1420 x 1.05	1491
c)	Annual requirement	b/10	149.1
d)	5 year requirement	149 x 5	745.5
e)	Deliverable land supply	units	1959
f)	Land supply in years	e/c	13.14

The Council can therefore demonstrate it has a deliverable land supply of **13.14 years**.

This statement also provides a calculation of land supply against the estimated housing need figure set out in the 2023 [Strategic Housing and Economic Need Assessment](#)² (SHENA), which replaced the Objectively Assessed Need (OAN) set out in the 2017 Strategic Housing Market Assessment (SHMA). The SHENA calculated a need of up to 250 dwellings per year for the period 2022-2032 but this number can also be applied across the plan period to 2040.

Against the local housing need figure identified in the 2023 SHENA, the Council can demonstrate **7.37 years** as set out below.

Table18: South Lakeland 5 Year Land Supply Position against its OAN

Step	Description	Calculation	Figure
a)	Housing Need 1 April 2020 - 31 March 2040	250 x 20	5000
b)	Plus 5% buffer over plan period	5000*1.05	5250
c)	Net completions 1 April 2020 - 31 March 2023	163+286+284	733
d)	Target Completions 1 April 2020 - 31 March 2023	250 x 3	750
e)	Current undersupply to date	d-c	17
f)	Annual requirement	b/ 20	262.5

² Available on the Local Plan evidence page of the Council's website or using this [link](#).



Step	Description	Calculation	Figure
g)	5 year requirement	fx5	1312.5
h)	5 year requirement plus undersupply	g+e	1329.5
i)	Annualised 5 year requirement	h/5	265.9
j)	Deliverable land supply	units	1959
k)	Land supply in years	j/i	7.37

Introduction

4.1. Background

- 4.1.1. Local planning authorities are required by national planning policy to identify and annually update a supply of specific deliverable sites sufficient to provide five years' worth of housing against their local housing requirement.
- 4.1.2. This document is the 2023 Housing Land Annual Position Statement for South Lakeland district outside the National Parks, to a base date of 31 March 2023. It provides an assessment of the district's 5-year housing land position against its local housing need using the national standard method as required by the National Planning Policy Framework, and as described in the online Planning Practice Guidance (PPG). It also provides a calculation against the Council's most recent local assessment of housing need using the standard method in the 2023 Strategic Housing and Economic Needs Assessment (SHENA).
- 4.1.3. This statement has been prepared in accordance with the revised National Planning Policy Framework (Sept 2023) and the updated Planning Practice Guidance and therefore is consistent with current national policy and guidance in relation to housing land supply issues.
- 4.1.4. The statement has been prepared based on permissions and completions information from the Council's planning application and building control software. It has been informed by engagement with developers, agents and landowners in summer 2023 in the form of a survey and follow up correspondence, to ensure that the judgments on site deliverability are robust and informed by evidence.

4.2. Structure of this Statement

- 4.2.1. This document is divided into the following sections:

Section 1 is this introduction and provides an overview of national and local policy and an explanation of the district's local housing need.

Section 2 explains how the Council is delivering a 5-year supply of land for new housing to meet immediate needs.

Section 3 provides a calculation of the Council's overall longer-term housing land supply position for across the new plan period 2020-2040.



4.2.2. The appendices contain more detailed information including a detailed schedule of sites that comprise the Council's 5 –year and supply and information on their deliverability, a record of recent housing delivery in the district, and maps showing the planning authority area and main settlements.

4.3. National Planning Policy and Guidance

4.3.1. The revised National Planning Policy Framework (NPPF), published in September 2023, requires Local planning authorities to ensure that their strategic policies provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs for housing over the plan period, in line with the presumption in favour of sustainable development, as far as is consistent with the policies set out in the NPPF.

4.3.2. The version of the NPPF³ in place at the base date of this position statement (31 March 2023) required planning authorities to identify and annually update a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old⁴. South Lakeland's Core Strategy is more than five years old, and the housing requirement figure within Policy CS6.1 is in need of review. South Lakeland must therefore calculate its 5-year supply using its local housing need. Footnote 39 of the NPPF states that where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance.

4.3.3. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- 5% to ensure competition and choice in the market for land, or
- 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year, or
- 20% where there has been significantly under delivery of housing over the previous three years (defined by the NPPF as delivery below 85% of the housing requirement).

4.3.4. The NPPF advises that if local planning authorities make an allowance for windfall sites in their anticipated housing land supply there should be compelling evidence that these sites will continue to provide a reliable source of supply.

4.3.5. The NPPF and guidance propose that where delivery falls below 95% of the local planning authority's requirement over the previous three years the authority should

³ NPPF July 2021 [\[ARCHIVED CONTENT\] \(nationalarchives.gov.uk\)](#)

⁴ Unless these strategic policies have been reviewed and found not to require updating.



prepare an action plan to detail the reasons and identify actions to address under delivery.

4.3.6. The NPPF defines 'deliverable' sites as follows:

“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. In particular:

- a) sites which do not involve major development and have planning permission, and all 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 (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years”*

4.4. South Lakeland Local Plan

4.4.1. The existing South Lakeland Local Plan covers the period from 2003 to 2025 and comprises of four main documents - called Development Plan Documents (DPDs):

Local Plan Part 1: South Lakeland Core Strategy (adopted in 2010) sets out the overarching spatial strategy and general principles for the long-term development of South Lakeland;

Local Plan Part 2: Land Allocations (adopted in 2013) allocates land for development and protection;

Local Plan Part 3: Development Management Policies DPD (adopted in 2019) sets out the criteria that new development has to meet;

Local Plan Part 4: Arnside and Silverdale AONB DPD (adopted in 2019) prepared jointly with Lancaster City Council to deal with the special issues associated with the Arnside Silverdale Area of Outstanding Natural Beauty.



Five Year Housing Land Supply Position

4.5. Introduction

- 4.5.1. This section sets out the local planning authority's housing land supply position at 31 March 2023 against its local housing need using the standard method, and the most recent local assessment of housing need in the SHENA. The methodology is explained below.

4.6. Methodology and Assumptions

Local Housing Need

- 4.6.1. The NPPF defines local housing need as the number of homes identified as being needed, through the application of the standard method set out in national planning guidance, or in the context of preparing strategic policies only, it may be calculated using a justified alternative approach.
- 4.6.2. The Planning Practice Guidance explains that where strategic policy making authorities do not align with local authority boundaries, such authorities may continue to identify a housing need figure using a method determined locally, but in doing so will need to consider the best available information on anticipated changes in households as well as local affordability levels. South Lakeland's planning area does not align with the local authority boundary due to the National Parks (see Appendix N for map), and the Council therefore has undertaken its own assessment of local housing need for plan making purposes. The Council commissioned a new Strategic Housing and Economic Need Assessment⁵ (SHENA) in 2022 which undertook an assessment of housing need based on the standard method, replacing the Objectively Assessed Need (OAN) set out in the 2017 Strategic Housing Market Assessment (SHMA). The method in the SHENA is consistent with the planning practice guidance in place and is based on the 2014 based household projections with a number of adjustments based on revised demographics. The SHENA calculated a need of up to 250 dwellings per year for the period 2022-2032 but this number can also be applied across the plan period to 2040.
- 4.6.3. Whilst the Council considers the SHENA to be an appropriate assessment of local housing need for plan making purposes using a locally justified alternative approach, it considers that in line with the NPPF the annual calculation of the five year land supply position for decision making purposes should be undertaken using the standard method. The calculation of the standard method for South Lakeland is set out below and is based on the most recent national guidance and therefore uses the 2014 based household projections as a starting point.

⁵ Available on the Local Plan evidence page of the Council's website or using this [link](#).



Table 19: Calculation of local housing need using standard method

Method	Calculation
2014 based projections starting point	
Households 2023	48274
Households 2033	49531
Household growth 2023-2033	1257
/10 years	125.7
Standard Method	
Step 1: Baseline	125.7
Step 2:Affordability <i>(Median workplace based affordability ratio = 9.67 (2022))</i>	$(9.67-4) = 5.67/4 = 1.4175$ $1.4175*0.25$ 0.3544
Minimum annual local housing need figure (1 + adjustment factor) x projected household growth	$1.3544 * 125.7$ 170 district wide figure
National Park deduction (need figure of 28 units per annum in 2023 SHENA)	$170 - 28$ 142 Local Planning authority figure

- 4.6.4. The figure of 170 dwellings per year resulting from the standard method calculation covers the whole of South Lakeland district which includes parts of the Yorkshire Dales and Lake District National Parks. In order to determine a standard method need figure for the South Lakeland Local Planning Area (LPA) excluding the national parks a deduction has been made for the national park areas. The most up to date understanding of housing need in the South Lakeland parts of the Yorkshire Dales and Lake District National Parks is that in the 2023 SHENA. This calculated an annual housing need of a minimum of 17 dwellings per annum in the Lake District and 11 dwellings per annum in the Yorkshire Dales, resulting in 28 units across the national park areas. This figure was deducted from the district wide figure of 170 to arrive at a standard method figure for the South Lakeland LPA of 142 dwellings per year.
- 4.6.5. In the absence of specific government guidance as to how local housing need using the standard method can be calculated for decision taking purposes, in districts with areas falling in national parks this is considered to be a logical approach. It should be noted that even if a district wide figure without a national park deduction is used, the Council can still demonstrate well in excess of a five year supply. This approach to calculating housing need using the standard method with a national park adjustment was considered to be a logical approach by a Planning Inspector in an appeal in South Lakeland in summer 2019.⁶

⁶ Appeal reference [APP/M0933/W/19/3226074](#)



4.7. Evidence of Deliverability

- 4.7.1. In line with the NPPF and PPG the Council only includes sites allocated in the development plan or major development sites with outline permission in the five year supply where it has clear evidence that they are deliverable and that completions will begin on site within five years.
- 4.7.2. The Council collects this evidence primarily through annual mail outs and surveys to site owners, agents, developers etc using the template included at Appendix O. It has been using this approach since 2017. Respondents are asked to fill in a form that requires evidence on availability, commencement dates, build out rates and details of any barriers that are delaying the delivery of sites. This survey information is followed up with further correspondence by email/telephone where necessary, for example to require additional detail, and is supplemented with discussions with development management officers who may have knowledge of sites from pre-application enquiries, pending planning applications etc. The responses received in the 2023 survey are included in Appendix 6 in a redacted format to remove personal or commercially sensitive information.

4.8. Buffer

- 4.8.1. The assessment includes a 'buffer' of 5% in line with the National Planning Policy Framework and Planning Practice Guidance to account for market fluctuations. The NPPF requires a 20% buffer where there has been a significant under delivery of housing over the previous three years, defined as delivery below 85% of the housing requirement using the Housing Delivery Test (HDT). The Council's first Housing Delivery Test for 2018 significantly exceeded this threshold, with an originally published score of 180% which was subsequently revised to 205%⁷. The Council's 2019 Housing Delivery Test result was 175%, again significantly exceeding the threshold, and the 2020 result was 176%. The 2021 HDT result was 155%. The 2022 HDT result was 157%.

4.9. Build Rates

- 4.9.1. The build rate assumptions in the five year supply calculation are largely based on the anticipated build rates provided by developers, agents etc. through our annual survey and correspondence, as those with the responsibility for delivering a site are considered best placed to advise on delivery rates.
- 4.9.2. We have however undertaken an analysis of completion rates on sites over 20 units, to understand past delivery and this is presented below. There are however a number of caveats relating to this analysis which make relying on simple averages problematic.
- 4.9.3. Firstly calculating averages means that outlier figures for years at the beginning or end of a site build can skew the figures downwards, for example if a site starts or

⁷ See Appendix P for an explanation of the Council's Housing Delivery Test result.



finishes delivering completions partway through a monitoring year. This can result in low single figure build rates which are unrepresentative of the actual build rates when a site is mid build. Secondly the Council's completions monitoring has historically relied solely on Building Control completion certificate records, and this can result in delays to completions being recorded, even though homes may be finished on site. In some cases the completions records have shown zero completions in some years and this does not reflect reality on the ground. The Council continually seeks to improve its monitoring processes and is considering supplementing its existing method with site visits for large sites to check progress on the ground.

- 4.9.4. The issues outlined above, and other factors such as the variations in characters between sites (e.g. typical estate housing, new apartment blocks, conversions of existing buildings, bespoke luxury developments) make drawing conclusions on simple averages difficult. The variation in sites, and issues of 'part year' outlier figures all contribute to significant ranges in any one year between build rates, as shown in the table below. Additionally some sites experience higher build rates to start and then 'trail' off as they are at the later stages.
- 4.9.5. Where information on build out rates hasn't been provided by developers or site owners, the Council will make a judgment on a case by case basis as to an appropriate build out rate to include in the trajectory. In general, for typical estate housing a built out rate of 25 dwellings per year is used, as this aligns well with the figures generally provided by developers in response to the survey.



Table 20: Build Rates

Application	Site	Net dwellings	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	Average (Mean) Completion rate
SL/2004/0892	Riverside Hotel, Kendal	46	36	6	2		2										11.5
SL/2008/0852	Baycliff Farm, Baycliff	21			12	7	2										7.0
SL/2009/0592	Former Stokers Garage, Kendal	35				35											35.0
SL/2005/0619	K Village, Kendal	90				32	22	16	17	4							18.2
SL/2009/0838	Biggins Lane, Kirkby Lonsdale	34				17	16										16.5
SL/2013/0887	Land adjacent to Berners Close, Grange	43					2	41									21.5
SL/2010/1015	Auction Mart, Kendal	95					2	47	16	12	12	6					15.8
SL/2010/0806	Oaklands, Union Lane, Ulverston	25					9	12		4							8.3
SL/2007/1354	Cragg Close, Kendal	94						32	29	14	14	5					18.8
SL/2013/0174	Wainwright View, Kendal	60						60									60.0
SL/2013/0830	Natland Mill Beck, Kendal	76						6	48	14		8					19.0
SL/2012/0425	Tram Lane, Kirkby Lonsdale	36						36									36.0
SL/2013/0075	Hallgarth Cottage, Kendal	26						13			13						6.5
SL/2013/0181	Gallowbarrow Mill, Kendal	23						9	14								11.5
SL/2013/0691	Carter Road, Grange over Sands	42							14	12	12	4					10.5
SL/2008/0790	Kendal Care Home, Kendal	24							24								24.0
SL/2015/0733	Kendal Parks - Phase 1, Kendal	50								11	38	1					16.7
SL/2012/0566	Oxenholme Road (Phase 1), Kendal	30								12	18						15.0
CU/2015/0001	Eskdale House, Kendal	25								25							25.0



Application	Site	Net dwellings	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	Average (Mean) Completion rate
SL/2015/0497	Greenside Farm, Hincaster	20								3	1	2					2.0
SL/2014/1036	Thornfield Road, Grange over Sands	64									21	37	6				21.3
SL/2016/0888	Greengate Crescent, Levens	49									1	36	12				16.3
SL/2016/0504	Church Bank, Burton in Kendal	29									7	7	1	3	5	1	4.0
SL/2016/0528	Kendal Parks - Phase 2, Kendal	22									6	16					11.0
SL/2016/0519	Kendal Road, Kirkby Lonsdale	78										3	23	15	10		12.8
SL/2015/0433	Stone Cross Mansion Ulverston	65										12	38	14	1		16.3
SL/2015/0098	1 Kent Street, Kendal	20										20					20
SL/2016/0317	Cedar House School, Kirkby Lonsdale	20										2					n/a
SL/2016/0519	Land to the south of Lumley Road, Kendal	110											11	16	28	17	18.0
SL/2016/0398	West of Oxenholme Road (Ph 2), Kendal	69											31	32	1		21.3
SL/2016/1109	Sir John Barrow Way (Lund Farm), Ulverston	101											15	25	13	19	19.3
SL/2018/0814	Land off Green Lane/ Vicarage Lane. Allithwaite	23												12	11		11.5
SL/2016/0602	Gascow Farm, Ulverston	235													48	42	45
SL/2018/0707	K Village, Kendal	88													63	25	44
SL/2017/0841	Sycamore Close, Endmoor	106													18	45	31.5
SL/2019/0398	South of Underbarrow Road, Kendal	83													25	3	14.0
SL/2018/0011	West of Oxenholme Road (Ph 3), Kendal	49												9	20	2	11.0



Application	Site	Net dwellings	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	Average (Mean) Completion rate
SL/2019/0880	West End Nurseries, Ulverston	91													15	40	27.5
SL/2019/0359	Land to the north of Boon Town	28														28	28
SL/2020/0410	Land adjacent to Underbarrow Road	19														10	10
SL/2019/0602	Land north of Laurel Gardens	157														5	5
SL/2016/1015	Land off Kendal Road	78														2	2
SL/2017/0620	Land south of Fell Close	104														25	25

	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023
Averages										
Mean	8	27	20	10	13	11	18	16	20	22
Median	2	24	17	12	12	7	16	15	15	19
Range	20	54	48	25	37	36	37	29	62	44



4.10. Lead in Times

- 4.10.1. For large sites individual assumptions on lead in rates are made on a site by site basis taking account of progress to date in bringing the site forward, and any lead in information provided by site owners, agents, developers etc. It is considered that those with an interest in developing a site are best placed to advise on likely lead in rates. The annual survey asks respondents to identify dates for the commencement of the development and also to identify any barriers that may delay or prevent delivery.
- 4.10.2. For sites where specific information isn't provided on lead in rates, the Council takes account of the lead in times stated in the Land Allocations DPD (page 18) which assume for sites less than 40 units, up to 1 year for design stage and relevant consents, and for sites of more than 40 dwellings up to 2 years for design and consents.

4.11. Implementation/Lapse Rates

- 4.11.1. For sites over 10 units the Council makes an individual judgment on a site by site basis as to whether and when they are likely to be implemented based on information provided by developers, agents etc through our annual surveys, and through discussions with development management case officers. For minor developments of 5-9 units with planning permission these are assumed deliverable within 5 years in line with national guidance.
- 4.11.2. With regards small site permissions of less than 5 units, which are not assessed individually, it is acknowledged that not all the permissions are likely to be implemented within five years. In 2018 the Council undertook analysis of small site planning permissions granted between 2012 and 2015 to understand how many permissions for units on small sites expired or were superseded by another planning permission (for example revised schemes, or further applications to prolong the life of the permission). The findings are set out below:

Table 21: Small site planning permissions granted 2012-2015

Year	2012-13	2012-13	2013-14	2013-14	2014-15	2014-15	2012-15	2012-15
Units	Net	%	Net	%	Net	%	Net	%
Number of units permitted on small sites	134	100	170	100	233	100	537	100
Number of units on small sites that have lapsed	57	42%	61	36%	69	30%	187	35%
Number of units on small sites that were superseded	26	19%	26	15%	14	6%	66	12%
Number of units on small sites that lapsed and were not superseded	31	23%	35	21%	55	24%	121	23%



4.11.3. The above analysis shows that planning permission lapsed for 35% of units on small sites granted permission between 2012-15. It should be noted however that for just over a third of these units, they were superseded by another permission and are likely to be built out over a longer timeframe. 23% of permitted units had lapsed planning permissions that were not superseded by further applications and therefore won't be implemented (but could of course be subject to further planning applications and be built out under those). For the purposes of five year supply calculations the discount rate of 35% is applied to the outstanding bank of small site permissions where construction has not yet commenced. In reality this figure is likely to be conservative, as the above data shows that some of these units will be superseded and built out under new permissions, but it is less likely that this would take within five years of the grant of the original permission.

4.12. Older People's Housing

4.12.1. The Council counts older people's housing towards its housing requirement, both in terms of its completions and future supply, in line with Planning Practice Guidance. The way it is counted depends on the type of accommodation, for example whether it is a care home, that would fall within use class C2 (residential institution) or sheltered housing, that would fall within use class C3 (dwelling house).

4.12.2. In accordance with the PPG (ID: 63-014-20190626) the Council will consider what use class permitted schemes fall into on a case by case basis, giving consideration to factors such as the level of care and scale of communal facilities provided. For extra care schemes, where care packages are optional and units are self-contained dwellings with their own front door that enable people to live independently, they will generally be treated as C3 dwelling houses and counted accordingly. Age restricted general market housing and retirement living or sheltered housing that support independent living will be treated as C3 dwelling houses. Residential care homes and nursing homes with individual rooms with high levels of care and no independent living will be considered C2 (residential institutions).

4.12.3. For older people's housing that is considered to be a residential institution the PPG (ID: 63-016-20190626) states that to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, using the published census data. For South Lakeland this results in the following:

Total Number of Adults living in households:	82,694
Total Households:	46,550
Average number of adults per household:	1.8

4.12.4. Therefore, for any residential institutions (C2 use classes) such as residential care homes, the supply towards the district's housing supply would be calculated by dividing the total number of bedrooms by 1.8.



4.13. Windfall Allowance

- 4.13.1. The NPPF (paragraph 70) states that an allowance can be made for windfall sites in the anticipated housing supply where there is compelling evidence that they will provide a reliable source of supply. It states that any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.
- 4.13.2. Within South Lakeland there is clear evidence that windfall completions have made a significant contribution to housing delivery over recent years and trends strongly suggest that they will continue to do so. An analysis of windfall trends is provided below.

Figure 3: Windfall completion trends 2003-2023

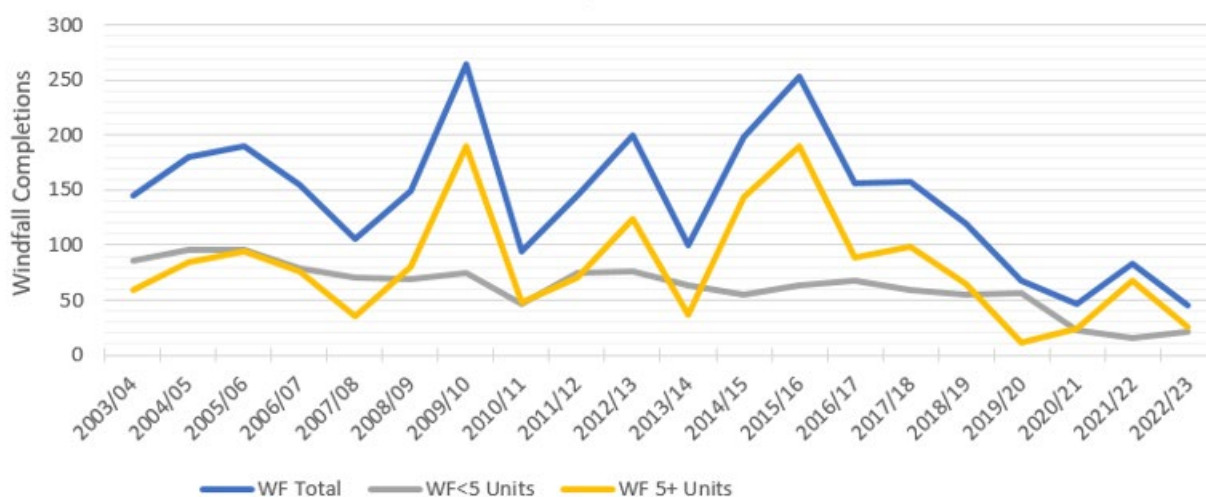


Table 22: Windfall Completions 2003-2023

Year	Windfall Completions	Total Completions	% Windfall	Five year average
2003/4	145	221	66%	N/A
2004/5	180	232	78%	N/A
2005/6	190	303	63%	N/A
2006/7	155	238	65%	N/A
2007/8	106	156	68%	155
2008/9	149	155	96%	156
2009/10	264	282	94%	173
2010/11	94	103	91%	154
2011/12	145	148	98%	152
2012/13	200	206	97%	170
2013/14	100	112	89%	161
2014/15	198	256	77%	147
2015/16	253	370	68%	179
2016/17	156	245	64%	181
2017/18	158	291	54%	173



Year	Windfall Completions	Total Completions	% Windfall	Five year average
2018/19	120	268	45%	177
2019/20	67	223	30%	151
2020/21	46	163	28%	109
2021/22	83	286	29%	95
2022/23	45	284	16%	72

4.13.3. The average rate of housing development from windfall sites over the period 1 April 2018 to 31 March 2023 was 72 units per year, a decrease from an average of 95 per year over the preceding five year period. In 2022/23 there were 45 dwellings completed on windfall sites, out of a total 284 dwellings, and windfall completions therefore comprised 16% of the total completions.

4.13.4. Table 23 below illustrates windfall completions trends on sites of less than and more than 5 units over the period 2003-2023. The five year average for small site windfall completions on sites less than 5 units has decreased to 34 dwellings per year and the five year average for windfall completions on sites of 5+ units has decreased to 38 dwellings per year.

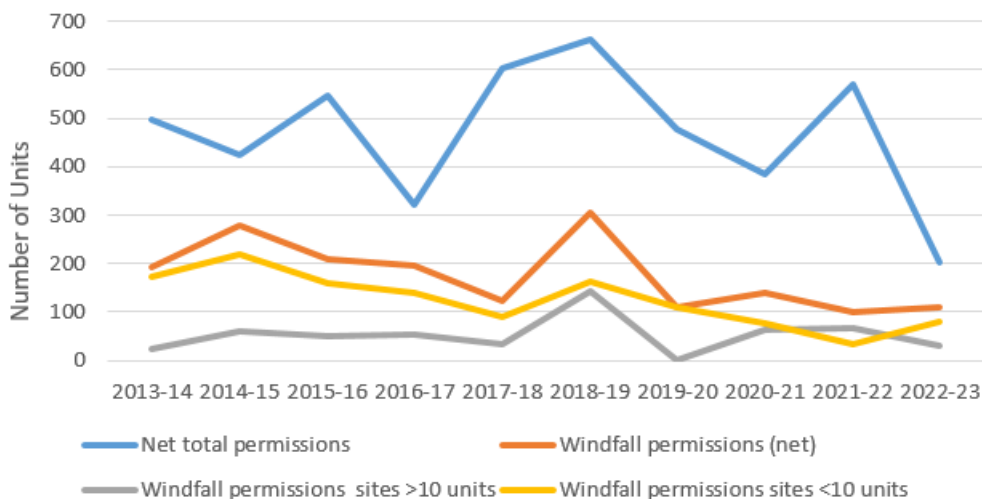
Table 23: Windfall Completions - Site Size

Year	Windfall Sites <5 Units	5 year average small sites <5 units	Windfall Sites >5 Units	5 year average sites 5+ units	Total Windfall
2003/04	86	N/A	59	N/A	145
2004/05	95	N/A	85	N/A	180
2005/06	96	N/A	94	N/A	190
2006/07	79	N/A	76	N/A	155
2007/08	71	85.4	35	69.8	106
2008/09	69	82	80	74	149
2009/10	74	77.8	190	95	264
2010/11	46	67.8	48	85.8	94
2011/12	74	66.8	71	84.8	145
2012/13	76	67.8	124	102.6	200
2013/14	64	66.8	36	93.8	100
2014/15	55	63	143	84.4	198
2015/16	63	66.4	190	112.8	253
2016/17	67	65	89	116.4	156
2017/18	59	61.6	98	111.2	157
2018/19	55	59.8	65	117	120
2019/20	56	60	11	90.6	67
2020/21	22	51.8	24	57.4	46
2021/22	16	41.6	67	53	83
2022/23	20	33.8	25	38.4	45



4.13.5. Windfall units continue to make an important contribution to the district’s housing supply and in 2022/23, out of a total of 201 dwellings (net) that were granted planning permission, 110 were on windfall sites, amounting to 55%. The graph below shows windfall permissions in recent years and shows that whilst levels fluctuate windfall sites continue to form a significant proportion of total supply.

Figure 4: Windfall Permissions 2013-2023



4.13.6. It is considered the level of windfall sites coming forward is likely to be maintained, for a number of reasons including the local planning policy framework, and recent national changes such as the increase in permitted development rights to create residential units through conversions from other uses. The recently adopted Development Management Policies DPD, through Policy DM13, also provides the opportunity for a potential increase in small windfall sites in rural areas through its more flexible approach to rounding off and infill in small villages and hamlets.

4.13.7. Based on the above evidence, a windfall allowance has therefore been factored into the 5 year land supply, using the five year average for windfall completions on small sites and large sites as a guide. From 2022 onwards the small site size threshold has been reduced to 5 units to align with the site size threshold used in the Strategic Housing and Economic Land Availability Assessment (SHELAA) that had begun to be prepared by SLDC. The average annual rate for completions on small windfall sites <5 units over the last 5 years has been 34 dwellings and the average annual rate for completions on windfall sites 5+ units has been 38 dwellings. The five year supply calculation ‘tops up’ existing known windfall permissions to the five year completions average, on the assumption that trends will likely continue.



4.14. Summary of Assumptions

4.14.1. As advised in the planning practice guidance a clear and transparent table of assumptions is provided below which summarises the above information.

Table 24: Summary of Assumptions

Assumption	Explanation
Implementation rates on permissions	<p>For large sites over 10 units, each site is individually assessed based on information from developers and landowners.</p> <p>For small site permissions of less than 5 units a discount of 35% is applied to the total number of units on sites where construction has not commenced, based on an analysis of lapse rates for sites granted planning permission in the district in 2012-2015.</p>
Lead in times	<p>Where lead in time information is provided by developers and landowners as part of our annual survey this is used. Large sites are assessed individually and individual judgements will be made on lead in times given known constraints or barriers.</p> <p>For other sites, as a general guideline the lead in times from the Land Allocations DPD (page 18) are taken into account: up to 1 year for design stage and relevant consents for sites less than 40 units, and up to 2 years for design and consents on sites of more than 40 dwellings.</p>
Build rates	Build rates provided by developers/site owners are generally used, and elsewhere where rates are not provided a general assumption of 25 units per year for estate housing is used.
Older people's housing	<p>A judgement is made on a case by case basis as to whether a scheme falls into C2 or C3 use class.</p> <p>For C2 schemes a ratio of 1.8 is used to convert bedrooms to units. For C3 schemes units are counted individually as self-contained dwellings.</p>
Windfall allowance	Divided into an allowance for sites of 5+ units and sites <5 units. Both allowances are based on average windfall completion rates over the preceding five years, and known windfall permissions are 'topped' up to these levels on the assumption that trends will continue. 38 dwellings per year on sites 5+ units are assumed, and 34 dwellings per year on small (<5 units) windfall sites.

4.15. Components of the Five Year Land Supply

4.15.1. This section explains the various sources of housing supply that are included in the five year land supply, and section 4.24 presents the five year land supply calculation.



4.16. Sites with Permission

4.16.1. Sites with planning permission (both dwellings not started and those under construction) are set out in Appendix L. The record of progress on development sites is based mainly on building control records, which monitor the start and completion of dwellings. In some cases there is a delay between the actual completion of a dwelling and the issuing of a completion notice by building control. In a few cases information on completions is based on site visits or other up-to-date information such as Council Tax registrations or Gazetteer address data. The housing completions and planning permissions in the report are net figures to take account of (for example) the conversion, redevelopment or demolition of existing dwellings.

4.17. Large Sites 10+ units with Permission

4.17.1. An individual assessment has been undertaken of large sites (10 or more dwellings) with planning permission (including sites that are already under construction). Together, at 31 March 2023, these provide a total supply of 1,574 outstanding dwellings (net).

4.17.2. In most cases the assessment of deliverability is based on the judgment of planning officers in conjunction with information provided by owners, developers or agents. This evidence is summarised in Table 35, Table 36 and Table 37 in Appendix L. This assessment has concluded that **1,197 dwellings** on large permitted sites of 10+ units are considered deliverable within 5 years.

4.18. Sites of 5-9 units with Permission

4.18.1. From 2022 permitted sites of 5-9 units are now listed individually in the 5 year land supply schedule to align with the site size threshold used in the Strategic Housing and Economic Land Availability Assessment (SHELAA) formerly in preparation by South Lakeland District Council.

4.18.2. These sites as minor development with planning permission are assumed deliverable in line with national government guidance. They are listed in Table 38 of Appendix L and contribute **51 dwellings** to the deliverable land supply.

4.19. Small Sites <5 units with Permission

4.19.1. The remaining supply of small sites (less than 5 units) with planning permission at 31 March 2023 comprises land for 305 net dwellings on 256 small sites. 106 units are under construction and 183 units have not yet commenced.

4.19.2. Small site permissions comprise 86% of all sites with planning permission (256 sites out of a total of 299 permitted sites). The Council has insufficient resources to assess the individual deliverability of each of these sites separately and therefore applies assumptions as set out below.



- 4.19.3. The NPPF states: “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 schemes will not be implemented 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)”.
- 4.19.4. However, a discount of 35% has been applied to outstanding units on sites where construction has not yet commenced to account for the fact that some of these permissions will likely not be implemented and will expire. This assumption is based on analysis of lapsed permissions over the period 2012-2015. It is therefore estimated that **240 dwellings** are deliverable on small sites within 5 years, which is considered a conservative estimate. The calculation is shown below:

Table 25: Small permitted sites calculation

Small Sites <5 units	Number of sites	Number of outstanding net units	Apply 35% discount to units on NS sites:	Small Sites 5 Year Supply
Sites under construction (UC)	101	122	N/A	122
Sites that have not commenced (NS)	155	183	146 x 65%	119
Total	256	305	N/A	241

4.20. Unconsented Land Allocations

- 4.20.1. Sites allocated in the Land Allocations DPD are listed in policy LA1.3 of the DPD along with other site specific policies, including a number of mixed use allocations. The Arnside and Silverdale Local Plan was adopted in March 2019 and also introduced a small number of new allocations. Having taken into account permitted and completed allocation sites, the total remaining capacity of unconsented allocated sites is 1,984 units.
- 4.20.2. The remaining unconsented residential allocations considered deliverable within 5 years are listed in Table 33 and Table 39 of Appendix L. These sites are predicted to contribute **437 dwellings** to the deliverable land supply.
- 4.20.3. Table 39 provides evidence of each site’s deliverability based on recent engagement with developers, agents and landowners. The responses provided by landowners and developers can be found in Appendix Q. Further information on the suitability, availability and achievability of these sites can also be found in the Land



Allocations DPD and settlement fact files and other evidence base documents which accompanied the DPD at its submission and examination.

4.20.4. It has been assumed that the site capacities estimated in the Land Allocations DPD remain appropriate, and have been used to calculate the future supply from unconsented allocations. This assumption is based on the evidence in Table 26 below that compares the estimated site capacities in the DPD with the number of units that have subsequently been granted planning permission (or granted subject to Section 106) on each site. It demonstrates that the capacity estimates in the DPD have proved to be very accurate and, on the whole, sites have actually generated slightly more units than originally estimated. On average the permitted capacity of sites has been 7% higher than the estimated site capacity in the Land Allocations DPD.

Table 26: Capacity of Permitted Allocated Sites

Site and Capacity	Land Allocations DPD (estimated units)	Planning Permission (units)	Permitted capacity as % of estimated capacity
Croftlands West (Nook Farm), Ulverston	309	330	107%
Gascow Farm, Ulverston	219	235	107%
North of Laurel Gardens, Kendal	197	157	80%
Land West of Oxenholme Road, Kendal	100	148	148%
South of Lumley Road, Kendal	122	119	98%
Land North of Sycamore Close, Endmoor	100	106	106%
Kendal Parks, Kendal	100	105	105%
Land South of Fell Close, Oxenholme	61	104	170%
West End Nurseries, Ulverston	92	86	93%
Land off Kendal Road, Kirkby Lonsdale	80	78	98%
Land South of Natland Mill Beck Farm, Kendal	73	76	104%
Thornfield Road, Grange over Sands	66	64	97%
Stone Cross Mansion, Ulverston	50	65	130%
Greengate Crescent, Levens	50	49	98%
Land adjacent Burlington School, Kirkby-in-Furness	41	46	112%
Carter Road, Grange over Sands	45	42	93%
Land at Haggs Lane, Cartmel	39	39	100%
East of Boon Town, Burton-in-Kendal	23	28	122%
North of Watery Lane, Ulverston	18	28	156%
Land West of High Garth, Kendal	23	27	117%
East of Hutton Close, Burton in Kendal	31	27	87%
North of High Sparrowmire, Kendal	24	25	104%
Eskdale House, Kendal	12	25	208%
North of Jack Hill, Allithwaite	27	22	81%



Site and Capacity	Land Allocations DPD (estimated units)	Planning Permission (units)	Permitted capacity as % of estimated capacity
Cedar House School, Kirkby Lonsdale	20	20	100%
East of Burton Road, Oxenholme	24	17	71%
Vicarage Drive, Kendal	13	15	115%
Bifold Croft, Kirkby Lonsdale	9	10	111%
South of Stockbridge Lane, Ulverston	7	7	100%
Land adjacent to St Anthony's Close, Milnthorpe	9	8	89%
Lund Farm, Ulverston	90	101	112%
Green Lane, Allithwaite	22	23	105%
Rear of Barn Hey, Allithwaite	30	40	133%
TOTAL	2,005	2,141	107%

4.21. Windfall Allowance

4.21.1. An additional windfall allowance is included within the five year supply as set out below.

4.22. Windfall Sites 5+ Units

4.22.1. Firstly with regards to large windfall sites a total of 253 units from known permitted windfall sites of 5+ units are included in the 5 year supply as set out in the table below. Given recent trends an average of 38 windfall completions per year would be expected on windfall sites of 5+ units. It is therefore considered robust and justified to apply an additional windfall 'top-up' for large sites in years 4 to 5 as set out below.

Table 27: Large Sites Windfall Projections

Type of windfall	2023/24	2024/25	2025/26	2026/27	2027/28	Total
Permitted windfall sites (5+ units) projected completions	27	160	24	26	16	253
Proposed additional windfall allowance to 'top-up' past completions rates	0	0	0	12	22	34
<i>Total windfall on sites 5+ units in 5 year supply</i>	<i>27</i>	<i>160</i>	<i>24</i>	<i>38</i>	<i>38</i>	<i>287</i>



4.23. Windfall Sites <5 Units

4.23.1. With regards to known small site (<5 units) permissions, of which almost all are windfall, 240 units are projected to be delivered over the next 5 year period. Taking into account the average completion rate for small site windfall over the last five years of 34 dwellings per year, it is not considered necessary in this year's statement to apply an additional windfall allowance for small sites to 'top up' projected completions to align with past trends.

Table 28: Small Sites Windfall Projections

Type of windfall	2023/24	2024/25	2025/26	2026/27	2027/28	Total
Permitted windfall sites (<5 units) projected completions	48	48	48	48	48	240
Proposed additional windfall allowance to 'top-up' past completions rates	0	0	0	0	0	0
<i>Total windfall on sites <5 units in 5 year supply</i>	48	48	48	48	48	240

4.23.2. These assumptions will be kept under review and may be adjusted to take account of further information, future trends, analysis and feedback.

4.24. Calculation of five year land supply

4.24.1. Based on the deliverable supply of 1,989 units identified above, the Council's five year land supply calculation is as follows.

Table 29: Five Year Land Supply Calculation - Standard Method

Land Supply:	Calculation	Figure
a) Local Housing Need 2023-2033	142 x 10	1420



Land Supply:	Calculation	Figure
b) Plus 5% buffer over period	1420 x 1.05	1491
c) Annual requirement	b/10	149.1
d) 5 year requirement	149 x 5	745.5
e) Deliverable land supply comprising <ul style="list-style-type: none"> • Large Site Planning Permissions at March 2023 (UC) (911) • Large Site Planning Permissions at March 2023 (NS) (286) • Sites 5-9 Units with Permission (51) • Small Site Planning Permissions at March 2023 (240) • Unconsented Land Allocations (437) • Additional Windfall Allowance 2023-2028 (34) 	Total supply from sources	1959
f) Land supply in years	e / c	13.14

4.24.2. The Council can therefore demonstrate a **supply of 13.14 years** of housing land against its local housing need using the standard method.

4.24.3. For plan making purposes, a calculation against the local housing need figure from the 2023 Strategic Housing and Economic Need Assessment is provided below. This demonstrates 7.37 years supply against the SHENA figure.

Table 30: Five Year Land Supply Calculation – Local Housing Need (SHENA)

Step	Description	Calculation	Figure
a)	Housing Need 1 April 2020 - 31 March 2040	250 x 20	5000
b)	Plus 5% buffer over plan period	5000*1.05	5250
c)	Net completions 1 April 2020 - 31 March 2023	163+286+284	733
d)	Target Completions 1 April 2020 - 31 March 2023	250 x 3	750
e)	Current undersupply to date	d - c	17
f)	Annual requirement	b / 20	262.5
g)	5 year requirement	f x 5	1312.5
h)	5 year requirement plus undersupply	g + e	1329.5
i)	Annualised 5 year requirement	h / 5	265.9
j)	e) Deliverable land supply comprising <ul style="list-style-type: none"> • Large Site Planning Permissions at March 2023 (UC) (911) • Large Site Planning Permissions at March 2023 (NS) (286) • Sites 5-9 Units with Permission (51) • Small Site Planning Permissions at March 2023 (240) • Unconsented Land Allocations (437) • Additional Windfall Allowance 2023-2028 (34) 	Supply from all sources	1959
k)	Land supply in years	j / i	7.37



4.25. Long Term Housing Land Position

- 4.25.1. Table 31 sets out the overall housing land position for the District Local Plan over a longer term period to 2040. This is based on a local housing need figure of up to 250 dwellings per annum in the 2023 South Lakeland Strategic Housing and Economic Need Assessment (SHENA).
- 4.25.2. The table shows an overall supply of land for **4,841** dwellings to meet a residual need of 4,267 dwellings to 2040, when account is taken of existing permissions, sites allocated in the adopted Land Allocations DPD, broad locations and windfall sites. While this suggests there may be sufficient land for the longer term, it is important to note that updated evidence for the next Local Plan to 2040 will include a review of land supply in a Strategic Housing and Economic Land Availability Assessment (SHELAA) which will include a review of the suitability, availability and achievability of existing allocations. Also, the overall supply includes two Broad Locations at Appleby Road and Burton Road in Kendal (totaling 550 dwellings) which will need to be reviewed and formally allocated (if they remain appropriate) in the next Local Plan.

Table 31: Overall Housing Land Supply 2020-2040

Overall Housing Land Supply Calculation	Figure
a) Housing Requirement: 1 April 2020 – 31 March 2040 (20 years x 250 dwellings)	5,000
b) Net Completions: 1 April 2020 – 31 March 2023 (3 years)	733
c) Residual Requirement (a - b)	4,267
d) Total Housing Land Supply , comprising: <i>Large Site Planning Permissions at March 2023 (Under Construction) (938)</i> <i>Large Site Planning Permissions at March 2023 (Not Started) (636)</i> <i>Sites 5-9 Units with Permission (51)</i> <i>Small Site Planning Permissions at March 2023 (240)</i> <i>Unconsented Land Allocations (1984)</i> <i>Broad Locations (550)</i> <i>Additional Windfall Allowance 2023-2028 (34)</i> <i>Additional Windfall Estimate 2028-2040⁸ (442)</i>	4841
e) Overall Housing Land Supply Surplus/Deficit (d - c)	574

⁸ This comprises projecting forward the annual average small windfall site (<5 units) completions over the period 2018-2023 of 48 units per year over the remaining plan period 2028-2040. It does not include an estimate for large windfall sites that may come forward between 2028 and 2040.

