Strategic Housing Land Availability Assessment (SHLAA)

2017

April 2018
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1a Site Assessment Forms

1b Small Sites not individually assessed.

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1. **Introduction**

1.1 The ‘Strategic Housing Land Availability Assessment’ (SHLAA) is an assessment of how much land is suitable and available for housing development in Sefton. As required by government guidance, the SHLAA looks forward over a period of 15 years from 1\textsuperscript{st} April 2017 to 31\textsuperscript{st} March 2032.

1.2 The 2016 SHLAA is base dated to 1\textsuperscript{st} April 2017 and reflects the situation at that point in time. The study has been carried out ‘in house’ by officers from Sefton Planning Services.

1.3 The SHLAA will be updated annually to take account of new sites that emerge and changes in circumstance. Both the original 2008 SHLAA\textsuperscript{1} and subsequent 2010, 2011, 2012, 2013, 2014, 2015 and 2016 updates are available to view on Sefton’s web pages.

1.4 Importantly, whilst the SHLAA is a key piece of evidence, it does not in itself represent a statement of Council policy. Whilst the SHLAA will inform the Local Plan process, it is for the Local Plan itself to decide which sites should come forward for residential development and by what timescale. The inclusion of sites within this study does not necessarily that sites will be granted planning permission, although the principle of development is established. Planning applications will still need to demonstrate that the important details, including for example, neighbouring amenity, traffic and highways, design, contaminated land, heritage and flooding are all addressed. Similarly, sites that are excluded from the housing supply at this stage are not necessarily unsuitable for housing development and may have not been included because there is some uncertainty over ownership intentions or viability at this stage.

1.5 This study has closely followed government guidance including both the National Planning Policy Framework (NPPF), and the National Planning Policy Guidance (NPPG). Both NPPF and NPPG are available to download from the Department for Communities and Local Government (CLG) website as follows:

http://planningguidance.planningportal.gov.uk/

1.6 The Study is structured in accordance with the methodology flow chart specified in NPPG, which is set out overleaf

\textsuperscript{1} Carried out on Sefton, Knowsley, and West Lancashire Councils’ behalf by consultancy WYG.
SHLAA Methodology Flow Chart

Stage 1 - Site / broad location identification
Determine assessment area and site size
- Desktop review of existing information
- Call for sites / broad locations
- Site / broad location survey

Stage 2 - Site / broad location assessment
- Estimating the development potential
- Suitability
- Availability
- Achievability - including viability
- Overcoming constraints

Stage 3 - Windfall assessment
Determine housing / economic development potential of windfall sites (where justified)

Stage 4 - Assessment review
- Review assessment and prepare draft trajectory
- Enough sites / broad locations?
- Yes
- No
- Assessment of development need for housing and economic development uses
- Evidence base

Stage 5 - Final evidence base
- Deliverability (5 year supply) and developability for housing
- Informs development plan preparation
- Monitoring
Settlement Areas

1.7 For the purposes of both the SHLAA and the draft Local Plan, Sefton is split into six settlement areas. These are comprised of the following electoral wards:

- **Bootle:** Linacre, Derby, Litherland
- **Netherton:** Ford, Netherton & Orrell, St Oswald
- **Crosby:** Church, Victoria, Blundellsands, Manor
- **Sefton East:** Park, Sudell, Molyneux
- **Formby:** Ravenmeols, Harrington
- **Southport:** Meols, Cambridge, Norwood, Kew, Dukes, Birkdale, Ainsdale

Housing Requirement and Plan Period

1.8 The Local Plan was adopted on April 20th 2017 and proposed a minimum housing requirement of 500 dwellings per annum during 2012-2017, and 694 per annum during 2017-2030. This equates to an average of 640 dwellings per annum over the years 2012-2030 (the ‘Plan period’). This is supported by the Local Plan Inspector in his Local Plan report.

1.9 Prior to the stepped requirement being supported by the Local Plan Inspector, the annual average of 640 dwellings per annum is used to calculate the Borough’s 5 year supply. This approach is consistent with recent case law, including the ‘Hunston’ decision.

1.10 The Local Plan covers the years 2012-2030 (the ‘Plan period’). The 2012-base date was chosen to reflect the 2012-based household projections. The SHLAA therefore includes all housing completions between 1st April 2012 and 1st April 2017 in the housing supply. The SHLAA covers 15 years up to 2032, two years after the Local Plan period. There is no official adopted housing requirement for the years beyond 2030. The SHLAA allows the Council to monitor how effective the Local Plan is at meeting the Local Plan housing requirements.
2. **Site Identification**

2.1 Potential housing sites were identified from the following sources:

- All sites with planning permission for housing at 1\textsuperscript{st} April 2017
- Sites that previously had planning permission for housing (now expired)
- Sites subject to withdrawn or refused planning applications.
- Sites that had been assessed in the 2016 SHLAA
- Sites promoted to the ‘Call for Sites’
- Sites in the development programme of a local Housing Association
- Council owned sites that are surplus to requirements, or will become surplus to requirements in the short to medium term
- Other surplus public sector land
- Sites where significant demolitions were programmed
- Local Plan housing allocations

2.2 For sites without planning permission for housing only those likely to accommodate 5 or more dwellings were added to the assessment. This is consistent with the requirements in the National Planning Practice Guidance.

**The Call for Sites**

2.3 In order to identify additional potential sites Sefton has publicised a series of ‘Call for Sites’ since 2008. The most recent Call for Sites was publicised for 6 weeks up to 16\textsuperscript{th} August 2017. This was advertised prominently in the Champion Group of local newspapers and on the Council’s website. In addition, emails were sent to local agents, planning consultants, and developers asking if they wished to submit a site.

**Public sector and other surplus land**

2.4 No additional public sector land sites was identified.
Other Potential Sources of Supply

Vacant Homes

2.5 No contribution to the housing supply was assumed from bringing vacant homes back into use. This was for a number of reasons, including:

- No local authority has zero vacant homes, and the majority of vacant properties are temporarily vacant for legitimate reasons. For example, many properties become temporarily vacant as people move home, as properties are renovated, where people go into care / work abroad / are in prison, or where the owner has recently passed away, etc.

- The Council has limited powers to address vacant homes unless they are causing significant environmental problems or are a statutory nuisance. Even then, the number of properties that can be brought back into use is small. The limited resources that the Council has to address this issue are focussed on the most problematic properties.

- The vast majority of vacant homes in Sefton are in private ownership, and not owned by the Council or Housing Associations.

- There has been a relatively stable vacancy rate over recent years. This trend has continued with the percentage of vacant dwellings in Sefton being 4.13% in 2016 and 4.14% in 2017, and the long term vacancy figure being 2.4% in both 2016 and 2017. There is no evidence that this will significantly increase / decrease in the years ahead.

Empty spaces above shops and other commercial premises

2.6 This potential source of supply has previously been suggested to the Council by local campaign groups, campaigners, and some local politicians at various stages during the preparation of the Local Plan.

2.7 No contribution to the housing supply was assumed from converting empty spaces above shops and other commercial premises to housing in the 2017 SHLAA, for the reasons stated in the 2016 SHLAA:
• There have been few recent developments in Sefton to convert empty spaces above shops into new housing, despite this being encouraged in successive iterations of local and national planning guidance.

• When we have explored this issue with local Housing Associations and developers, the common response has been that there is very little interest in pursuing this type of development, which is seen as problematic. Reasons for this include: problems with multiple ownerships, safety issues associated with rear access, compliance with fire and building regulations when converting older properties, conflict between the length of lease typically offered for ground floor (retail) uses and those offered to residential uses (these are often incompatible), lack of demand, etc.

• Separately, we are not aware of any Local Authority who has sustained the argument that a significant part of their housing need could be met from this source at Local Plan Examination, despite the argument having widespread applicability.

• The extent to which such schemes have come forward historically will also be reflected in the windfall allowance (which is trend based).

Land in Green Belt

2.8 Sites have been submitted through the “call for sites” process in the Green Belt. Only sites where it is clear that they benefit from one of the exemptions in pars 89 and 90 in the NPPF could be included in the SHLAA supply. None of the 2017 all for sites submissions in the Green Belt have been included as being appropriate.

Monitoring and Review

2.9 It would be impossible to anticipate every site that will come forward for housing over the next 15 years. This particularly applies to smaller sites and conversion sites. The SHLAA will continue to be updated annually to take account of new sites, and other changes in circumstance. A ‘windfall allowance’ has also been included in SHLAA which makes an assessment of the contribution that unanticipated sites could make (see section 4).
3. Site Assessment

3.1 To be included in the SHLAA housing supply, the NPPF requires that sites are:

‘Deliverable’ (0-5 year supply) – defined as “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 and in particular that development of the site is viable” (NPPF footnote 11); or

‘Developable’ (6-15 year supply) – defined as “in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged” (NPPF footnote 12)

3.2 The SHLAA assessment has been structured to ensure that sites included within the identified housing supply meet these requirements.

Sites with Planning Permission for Housing

3.3 Sites with planning permission for housing at 1st April 2017 form a significant proportion of the SHLAA housing supply. In general, these sites are more certain to be delivered than sites without planning permission as they already have approved schemes in place and the owner / developer has gone to the time and expense of preparing and submitting a planning application.

3.4 This higher level of certainty is reflected in footnote 11 of NPPF, which states that:

“Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.”

3.5 In addition, sites with planning permission have already been determined as suitable for housing by the Council. The SHLAA assessment is therefore limited to gauging whether sites are ‘available’ and ‘achievable’, and if so the likely development timescales.

3.6 For larger sites with planning permission (20+ dwellings), the owner / developer were contacted to establish their development intentions. Annual build out rates were agreed with the developer, factoring in lead-in times and planned phasing. Larger sites were only removed from the SHLAA supply (either in whole or in part) where the owner / developer indicated that the site would not be developed for housing.
3.7 For smaller sites (less than 20 dwellings) the site owner / developer was not contacted. Instead, a discount of 10% was applied to the total capacity of all small sites. This was to reflect the fact that some of these permissions would likely not be developed or would expire\(^2\).

3.8 In general, sites with planning permission were placed in the 0 – 5 year supply. Sites were only placed in 6 – 10 year supply where the owner / developer indicated they would likely not develop the site in the short term. In addition, a number of larger sites are to be phased over a number of years and will therefore be only partially developed in the 0 – 5 year period. Delivery on smaller sites (less than 20 dwellings) was forecast based on historic delivery trends for sites of this size.

**Sites without Planning Permission**

3.9 Sites without planning permission for housing at 1st April 2017 were subject to a more detailed assessment, including an assessment of ‘suitability’. This included a desktop assessment using mapping, accessibility mapping, aerial photographs, planning history, and other intelligence.

3.10 Site suitability, availability, and achievability were assessed as follows:

**Site Suitability**

3.11 Sites were assessed as ‘suitable’ where:

- The 2006 Unitary Development (UDP) designation and draft Local Plan was permissive of residential development; and

- The site was not subject to major constraints, including flood risk, heritage, ecology, inadequate access, etc\(^3\).

3.12 Sites designated as **Open Space** in the Local Plan were generally excluded from the identified housing supply as not being “suitable”, except where development would be possible on the footprint of existing buildings or hardstanding. Urban Greenspace/Open Space sites were not specifically re-assessed against NPPF para’s 73-74.

3.13 Sites designated as **Employment Areas** in the Local Plan were generally excluded from the identified housing supply as not being “suitable” in principle. This is based on the findings of the ‘Employment Land & Premises Study’ 2012 Refresh which recommended that Sefton

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\(^2\) This could be for a variety of reasons, including: the permission was for valuation purposes only, the owner changes their mind, develops the site for another use, or is unable to sell the site once permission granted, etc

\(^3\) This was consistent with the constraints assessed by Sustainability Appraisal of potential Local Plan housing allocations.
should protect land that is currently allocated for employment purposes in order to meet the needs of local businesses and to attract investment.

Site Availability

3.14 Sites were assessed as ‘available’ where there was a clear (recent) owner commitment to developing the site for residential development. This included sites that:

- Had been submitted to a recent Call for Sites
- Were in a developer’s or Housing Association’s development programme
- Had been granted planning permission subject to the signing of a s106 agreement
- Were subject to a pending planning application for housing
- Had been subject to recent pre-application enquiries for housing development;
- Public sector land that had been declared surplus
- Where the owner had confirmed in writing their intention to pursue residential development on the site.

3.15 All Council-owned sites in the SHLAA housing supply had either formally been declared surplus, or were subject to a Cabinet resolution stating that they were in principle suitable locations for housing development (subject to planning permission), and would be progressed for development at the appropriate time.

Site Achievability

3.16 Site viability was measured using the recent ‘Local Plan & Community Infrastructure Levy Economic Viability Study’ (December 2014), which was prepared on the Council’s behalf by Keppie Massie. This study contains area-based viability assessments for different sizes/types of housing development. The only area of the Borough where residential viability was found to be marginal was Bootle and Seaforth (particularly in relation to smaller schemes). In order to reflect this in the SHLAA, smaller sites in Bootle and Seaforth without planning permission were generally placed outside of 0-5 year supply to allow for the recovery of the local market.
Site Assumptions

3.17 Of the sites that were included in the housing supply, the following broad assumptions were applied:

- **Site density**: the majority of sites were assessed against a standard site density of between 30 and 40 dwellings per hectare, depending on the shape of the site and the character of the surrounding area. A higher density was applied to a minority of sites that were considered most suited to apartment development. Lower densities were applied in areas that were characterised by low density housing or where other constraints dictated otherwise.

- **Timescales**: an estimate was made of when each site was likely to be developed for housing. Sites without planning permission were placed in three periods: short term (0-5 years), medium term (6-10 years), and long-term (11-15 years). In line with national guidance, sites placed in the 0-5 year period had to be “suitable, available, and achievable” – usually evidenced by a clear indication that the owner is looking to progress the site for housing in the short term.

- **Net developable area**: this was assessed based on the size of the site, as set out below. A smaller net developable area is assumed for larger sites to reflect the need to provide access roads, open space, etc:

- **Local Plan allocations**: The site capacity has been taken from the Local Plan unless other information has come from the developer. The timescales have come from the developer, whether in writing or through the submission of a pre-application or an application. In a number of examples developers have submitted development timescales that were challenging. In these instances the Council has made a judgement on whether to temper these a little in order to make the timescales more realistic.

<table>
<thead>
<tr>
<th>Total Site Area</th>
<th>Net Developable Area</th>
</tr>
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<tbody>
<tr>
<td>Less than 0.4 ha</td>
<td>100% of developable area</td>
</tr>
<tr>
<td>0.4 ha to 2 ha</td>
<td>90% of developable area</td>
</tr>
<tr>
<td>Sites over 2 ha</td>
<td>75% of developable area</td>
</tr>
</tbody>
</table>

Source: Tapping the Potential, ODPM, 2000
• **Discounting**: discounting was applied to reflect the fact that some sites would not be developed for housing as anticipated for a variety of reasons. For sites without planning permission, an across-the-board discount of 20% was applied to reflect these issues.

**Accessibility**

3.18 Each site is also measured against the following accessibility criteria (using straight line distances):

- Within 800m of a Primary School
- Within 800m of a Local Centre
- Within 800m of a GP surgery or Health Centre
- Within 800m of a Railway Station
- Within 400m of a Bus Stop

**Demolitions**

3.19 The historic pattern of demolitions in the Borough (since 2003) is set out in the table below. Since the early 2000s, there have been relatively high numbers of demolitions in Sefton. However, the majority of these were accounted for by the former Housing Market Renewal (HMR) programme and legacy schemes. The clearance of Council-owned properties and properties owned by One Vision Housing (the largest Housing Association in the Borough) have also accounted for significant numbers of demolitions:

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<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Allocated / other large sites</td>
<td>0</td>
<td>24</td>
<td>20</td>
<td>35</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>7</td>
<td>1</td>
<td>0</td>
<td>2</td>
<td>0</td>
<td>0</td>
<td>90</td>
</tr>
<tr>
<td>HMR and legacy programmes</td>
<td>0</td>
<td>21</td>
<td>59</td>
<td>150</td>
<td>110</td>
<td>167</td>
<td>130</td>
<td>159</td>
<td>59</td>
<td>41</td>
<td>0</td>
<td>141</td>
<td>333</td>
<td>0</td>
<td>1,370</td>
</tr>
<tr>
<td>Council owned sites</td>
<td>19</td>
<td>4</td>
<td>0</td>
<td>67</td>
<td>167</td>
<td>160</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
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<td>0</td>
<td>417</td>
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<td>One Vision owned sites</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>17</td>
<td>50</td>
<td>53</td>
<td>0</td>
<td>0</td>
<td>24</td>
<td>207</td>
<td>2</td>
<td>353</td>
</tr>
<tr>
<td>Other small sites</td>
<td>14</td>
<td>16</td>
<td>24</td>
<td>7</td>
<td>19</td>
<td>9</td>
<td>12</td>
<td>13</td>
<td>18</td>
<td>12</td>
<td>14</td>
<td>7</td>
<td>10</td>
<td>6</td>
<td>181</td>
</tr>
</tbody>
</table>

4 For example: owner changes their mind, development of the site for another use (e.g. offices/shops etc), sites delivering fewer homes than anticipated, complex land ownerships, unforeseen problems such as land contamination, infrastructural problems, access problems, legal covenants, etc.
### Local Plan Housing Allocations

3.24 Local Plan allocations are a special category. They have all gone through rigorous assessment in the Local Plan which confirmed that they are suitable, available and deliverable and the Inspector agreed with this is in his report. Therefore, whilst many of these sites do not yet have planning permission, the commitment to the sites has been demonstrated and often there are clear timescales for bringing the sites forward.
3.25 The developers/landowners have all been contacted and where they have responded, their delivery assumptions have been taken forward. Where these assumptions have seemed challenging, they have been scaled back in line with our own assumptions.

3.26 We have ensured that there has been a cautious and robust approach taken. Therefore a number of allocations without planning permission are have partially or wholly been included in the five year supply and all allocations in the 6-15 years supply.
4. **Windfall Allowance**

4.1 ‘Windfalls’ are unanticipated sites that come forward for housing development. NPPF allows for a windfall allowance to be included in the housing supply where this is supported by “compelling evidence”:

> “Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to 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, and should not include residential gardens." (para 48)

4.2 It is considered that “compelling evidence” exists to justify a windfall allowance in Sefton, and this is set out in detail below.

**Benchmarking historic windfall delivery**

4.3 Sefton’s first SHLAA was produced to a base-date of 1st April 2008, and annual updates have been published every year since 2010. These studies allow windfall planning permissions to be measured over the last seven financial years from 2008/09 to 2015/16.

4.4 Windfall planning permissions were identified using the following approach:

- Each year, sites granted planning permission for housing were filtered to remove those that had been identified in the previous year’s SHLAA. Permissions in financial years 2008/09 and 2009/10 were measured against the 2008 SHLAA, permissions in 2010/11 against the 2010 SHLAA, permissions in 2011/12 against the 2011 SHLAA, and so on until permissions in 2016/17 have been assessed against the 2016 SHLAA. Permissions on sites that had not been identified in the previous SHLAA were identified as ‘windfalls’.

- Planning permissions for development on residential gardens were then removed (as per NPPF para 48).

- Unanticipated losses of housing stock were also included to produce a ‘net’ windfall figure, as follows:
  - Unanticipated losses of dwellings were included in (deducted) from the windfall contribution. For example where a house was converted to an office, this resulted in a windfall contribution of -1.
  - The windfall contribution related to the net additional dwellings created. For example, a scheme to demolish two
existing dwellings and build 4 new dwellings would result in a net contribution of 2.

4.5 NPPF requires that local authorities must demonstrate “compelling evidence that such sites [windfalls] have consistently become available in the local area and will continue to provide a reliable source of supply”. With this requirement in mind, historic windfall permissions were sifted to remove larger sites (20+ dwellings) and exceptional sites that were unlikely to form part on any future trend. The following sites were removed as following:

- DC/2016/00345 – 105-107 Church Road, Formby. 40 bed residential care scheme. It is uncertain whether unanticipated schemes of this size will come forward in Formby in the future.

- DC/2015/02194 – Land at Leonard Cheshire Homes, College Path, 34 units Formby. The site was formerly on Greenspace and it is not clear whether sites like this will be available in the future.

- DC/2015/00230 – Mayflower industrial Estate (C2 part), Liverpool Road, Formby. 75 units (part C2) It is uncertain whether unanticipated schemes of this size will come forward in Formby in the future.

- DC/2016/00255 – Ruthven Road former school, Beach Road, Bootle. 25 units. The site is a former school site. It is not clear whether this type of site will come up in the future. Most redundant school sites are Local Plan allocations.

- DC/2014/02098 – conversion of Daniel House, Bootle, to 180 apartments. This is the only scheme of this type that has come forward in central Bootle in the last 10 years.

- DC/2014/0062 – Development of 46 retirement apartments at 16-24 Moor Lane, adjacent to Crosby Centre. It is uncertain whether schemes of this size/type will come forward on unanticipated sites in the future.

- S/2013/0658 – Mixed use scheme for retail development and 56 apartments in Southport Town Centre. It is uncertain whether schemes of this size/type will come forward on unanticipated sites in the future.

- S/2013/0245 - construction of 24 dwellings and a 28 unit extra-care facility at Liverpool Road South, Maghull. Designated as ‘Urban Greenspace’ in the Sefton Unitary Development Plan (UDP) where residential development is normally not permitted.
• S/2013/0030 – construction of 13 dwellings at Kerslake Way, Hightown. Designated as ‘Urban Greenspace’ in the Sefton Unitary Development Plan (UDP) where residential development is normally not permitted.

• S/2012/0600 – outline planning permission for the construction of 97 dwellings at the ‘Crown Packaging’ Site, Heysham Road, Netherton. This site is designated as falling within a ‘Primarily Industrial Area’ where residential development is normally not permitted. However in this instance, an exceptional case was made to allow the site to be developed for housing.

• S/2012/0550 – construction of a 105 dwelling older persons housing scheme at Damfield Lane, Maghull. This large site is designated as ‘Urban Greenspace’ in the Sefton Unitary Development Plan (UDP) where residential development is normally not permitted.

• S/2012/0505 - conversion of existing nurses accommodation (associated with Southport Hospital) into 22 self-contained flats. There is very little key worker accommodation in Sefton, and the likelihood that similar conversions will take place in the future is therefore strictly limited.

• S/2011/0909 - outline approval for 300 dwellings on a ‘Major Developed Site in Green Belt’ at Ashworth Hospital, Maghull. It is highly unlikely that any further large unanticipated Green Belt sites will come forward for development ahead of the Local Plan.

• S/2009/0834 – vertical extension of 3 existing high rise tower blocks to create 116 new flats in Seaforth. Both this and application S/2009/0332 (below) were vertical extensions to existing tower blocks owned by OneVision Housing. Future extensions of this nature are highly unlikely to occur in the foreseeable future.

• S/2009/0332 – vertical extension of 4 existing high rise tower blocks to create 32 new flats in Bootle.

4.6 Once these large and exceptional sites were removed, windfall permissions were as follows:
### Non-Exceptional Windfalls in Sefton

<table>
<thead>
<tr>
<th>Year</th>
<th>Windfalls</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008/09</td>
<td>137</td>
</tr>
<tr>
<td>2009/10</td>
<td>109</td>
</tr>
<tr>
<td>2010/11</td>
<td>106</td>
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<tr>
<td>2011/12</td>
<td>135</td>
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<tr>
<td>2012/13</td>
<td>119</td>
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<tr>
<td>2013/14</td>
<td>185</td>
</tr>
<tr>
<td>2014/15</td>
<td>139</td>
</tr>
<tr>
<td>2015/16</td>
<td>165</td>
</tr>
<tr>
<td>2016/17</td>
<td>264</td>
</tr>
<tr>
<td><strong>Average:</strong></td>
<td><strong>151</strong></td>
</tr>
</tbody>
</table>

The majority of these permissions were for the conversion of an existing building to housing. In terms of their location, the majority of sites were in Southport, Crosby, and Bootle. However 2016/17 saw a big increase in windfalls in Sefton East and Netherton. Only Formby has seen no big increase in non-exceptional windfalls:

### Non-Exceptional Windfalls by new builds / conversions

<table>
<thead>
<tr>
<th>Year</th>
<th>New Builds</th>
<th>Conversions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008/09</td>
<td>11</td>
<td>126</td>
</tr>
<tr>
<td>2009/10</td>
<td>43</td>
<td>66</td>
</tr>
<tr>
<td>2010/11</td>
<td>28</td>
<td>78</td>
</tr>
<tr>
<td>2011/12</td>
<td>47</td>
<td>88</td>
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<tr>
<td>2012/13</td>
<td>17</td>
<td>102</td>
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<tr>
<td>2013/14</td>
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<td>2014/15</td>
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<td>74</td>
</tr>
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<td>2015/16</td>
<td>48</td>
<td>117</td>
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<tr>
<td>2016/17</td>
<td>121</td>
<td>143</td>
</tr>
<tr>
<td><strong>Average:</strong></td>
<td><strong>50.6</strong></td>
<td><strong>100.4</strong></td>
</tr>
</tbody>
</table>

### Non-Exceptional Windfalls by Settlement

<table>
<thead>
<tr>
<th>Year</th>
<th>Bootle</th>
<th>Netherton</th>
<th>Crosby</th>
<th>Sefton East</th>
<th>Formby</th>
<th>Southport</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008/09</td>
<td>20</td>
<td>0</td>
<td>4</td>
<td>3</td>
<td>10</td>
<td>100</td>
</tr>
<tr>
<td>2009/10</td>
<td>22</td>
<td>0</td>
<td>24</td>
<td>3</td>
<td>2</td>
<td>58</td>
</tr>
<tr>
<td>2010/11</td>
<td>3</td>
<td>11</td>
<td>17</td>
<td>9</td>
<td>6</td>
<td>60</td>
</tr>
<tr>
<td>2011/12</td>
<td>13</td>
<td>2</td>
<td>38</td>
<td>7</td>
<td>11</td>
<td>64</td>
</tr>
<tr>
<td>2012/13</td>
<td>23</td>
<td>4</td>
<td>21</td>
<td>2</td>
<td>14</td>
<td>55</td>
</tr>
<tr>
<td>2013/14</td>
<td>30</td>
<td>1</td>
<td>30</td>
<td>3</td>
<td>4</td>
<td>117</td>
</tr>
<tr>
<td>2014/15</td>
<td>33</td>
<td>1</td>
<td>15</td>
<td>6</td>
<td>13</td>
<td>71</td>
</tr>
<tr>
<td>2015/16</td>
<td>16</td>
<td>1</td>
<td>29</td>
<td>6</td>
<td>20</td>
<td>93</td>
</tr>
<tr>
<td>2016/17</td>
<td>27</td>
<td>27</td>
<td>66</td>
<td>41</td>
<td>16</td>
<td>87</td>
</tr>
</tbody>
</table>
### Average:

|   | 20.8 | 5.2 | 27.1 | 8.9 | 10.7 | 78.3 |

4.8 The vast majority of (non-exceptional) windfall planning permissions were for small schemes of less than 10 dwellings.

4.9 In addition, at the Unitary Development Plan Public Enquiry in 2004 the Council reported an average delivery of 295 windfalls per annum between 1997 and 2001 (albeit likely using a different methodology to identify windfalls).

#### Calculating a Future Windfall Allowance

4.10 The pattern of historic windfall delivery set out above has been used to project forward a windfall allowance. This has been calculated as follows:

- **Between 2008 - 2016** the average windfall delivery from smaller non-exceptional sites was 151 per annum.

- **Years 0 – 5**: windfall completions are assumed in years 3 – 5 only. By definition, windfall sites do not have planning permission at the base-date of the study. Therefore, a 24 month lead in time has been assumed to allow for the first windfalls sites to gain permission, and site works to be undertaken, before new housing is completed. In addition, the historic rate of windfall delivery was discounted by 10% in years 0-5 (the same rate of discount applied to small sites with planning permission). This translated into an annual rate of windfall delivery of 122 per annum in years 3 – 5 (366 in total). However we also deduct 30 per year from years 2 to 5 for demolitions. These are often connected with demolitions of sites to create space for the new development.

The vast majority of small sites (less than 20 dwellings) with a current planning permission are forecast to complete in years 1 and 2. There is therefore very little overlap between these sites, and windfall sites assumed to deliver in years 3-5.

- **Years 6-10 and 11-15**: a windfall contribution has been assumed in Southport and Crosby only in years 6-15, which are areas that have historically delivered the most windfall permissions. This is consistent with NPPG, which states:

> “Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance based on a geographical area (using the same criteria as set out in paragraph 48 of the National Planning Policy Framework)”.

19
It was not considered appropriate to assume a windfall allowance in Netherton, Formby, and Maghull in years 6-15, as these areas have historically delivered few windfalls. In addition, no windfall assumption was made in Bootle for years 6-15, as historic windfall permissions in this area have been very uneven. In addition, the 2014 ‘Local Plan & Community Infrastructure Levy Economic Viability Study’ found that the viability of small housing schemes in Bootle was generally negative.

In years 6-15 a reduced rate of windfall delivery is assumed (75% of historic delivery). This is to reflect the uncertainty inherent in projecting this far ahead.

The increasing in the number of windfalls in Sefton East and Netherton has increased this year but this does not constitute a consistent pattern of windfalls for those areas so we will continue to exclude those areas from contributing to the 6-15 years supply.

4.11 This approach is summarised in the table below:

<table>
<thead>
<tr>
<th>Plan Period</th>
<th>Assumptions</th>
<th>No. of units</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-5 years</td>
<td>90% of historic net windfall delivery assumed in years 3 – 5 (122 x 3) – 15 per year demolitions from years 2 – 5.</td>
<td>348</td>
</tr>
<tr>
<td>6-10 years</td>
<td>75% of historic windfall delivery assumed in Southport and Crosby in years 6-10</td>
<td>395</td>
</tr>
<tr>
<td>11 – 15 years</td>
<td>75% of historic windfall delivery assumed in Southport and Crosby in years 11-15</td>
<td>395</td>
</tr>
<tr>
<td>Total:</td>
<td></td>
<td>1138</td>
</tr>
</tbody>
</table>

Justifying a Windfall Allowance

4.12 NPPF paragraph 48 requires that local authorities demonstrate “compelling evidence” that windfall sites have formed, and will continue to form part, of the housing supply. A number of post-NPPF appeal decisions and Local Plan Inspector’s reports have confirmed that it is not sufficient to simply demonstrate past delivery, and that there must be clear reasons why windfalls will continue to be delivered.

4.13 Sefton’s justification for incorporating a windfall allowance is set out as follows:

There is a consist pattern of windfall permissions in Sefton:
• A consistent pattern of windfall permissions can be demonstrated in Sefton since 1st April 2008. Net windfalls have never dropped below 104, or exceeded 182 dwellings per annum over a 7 year period. The vast majority of these permissions were granted for less than 10 dwellings. Small sites, particularly those arising from conversions, are usually the most difficult sites to anticipate in advance.

The windfall allowance is based on cautious assumptions:

• This record of windfall delivery has taken place during a major housing market slowdown, when net completions have been below those experienced in previous years. Using the period 2008 - 2016 as a basis for projecting forward is in itself a cautious approach, as it reflects a period of historically low development activity.

• The assumptions used to project forward a windfall allowance are also cautious. Larger ‘exceptional’ historic windfalls have been excluded from the forward projection. In addition, a 10% has discount has been applied to the historic rate of delivery on smaller sites in years 3-5, rising to 25% in years 6-15.

• The windfall projection is based on sites that were granted planning permission for development. No assumption is made about dwellings created under Permitted Development Rights (that do not require planning permission). This reinforces the cautious nature of the assessment.

• Sefton’s SHLAA has closely followed NPPF and NPPG and has only included sites in the housing supply where there is a known owner interest in development. Any sites where the owner’s intentions are currently unknown are therefore not included in the SHLAA housing supply.

Potential sources of future windfall sites:

• Several of the Borough’s settlements are Victorian or Edwardian (e.g. Southport, Bootle, and Crosby), and largely pre-date the modern planning system. These settlements contain large numbers of small commercial premises in residential areas that are often suitable for small housing developments. These uses are uncommon in modern planned housing estates. In addition, large Victorian properties often lend themselves to sub-division to apartments and will contribute to delivery from conversion sites. The historic pattern of windfall delivery (see above) confirms that the largely Victorian/Edwardian settlements have delivered the
majority of historic windfalls in Sefton. In contrast, settlements made up of largely post-war housing estates (e.g. Netherton and Maghull) have delivered few windfalls.

- More than half of historic windfall permissions have been granted in Southport. In addition to being a predominantly Victorian town, Southport contains the largest town centre in the Borough which will inevitably contribute windfalls from town centre apartment schemes, conversions, and mixed-use developments, etc.

Southport Town Centre has delivered a steady stream of completions from sites of less than 20 dwellings in recent years, as can be seen in the table below. The majority of these dwellings were delivered on conversion schemes:

- In addition, Southport contains a large number of small industrial/commercial ‘backland’ sites in Victorian residential areas that are potentially suitable for housing. The vast majority of these sites are in ‘Primarily Residential Areas’ on the adopted UDP map. Prior to the publication of NPPF, the Council sought to resist the loss of these sites to housing in order to support Southport’s economy. More recently however we have relaxed our position and are generally supportive of housing development on these sites. Mapping work for our 2003 Urban Housing Capacity Assessment identified more than 200 such sites in residential areas of Southport, although there are many sites that were not picked up in this analysis. An example of these backland sites is set out below:

Examples of ‘backland’ commercial / industrial sites in Southport
• It is anticipated that conversion schemes, and the redevelopment of ‘backland’ commercial sites in Southport will deliver a large number of windfalls in the years ahead.

• Since 2008, most windfalls have come from converting existing buildings to housing (usually to apartments). Recent changes to housing benefit (the “bedroom tax”) are likely to sustain this trend in the years ahead by increasing the demand for 1 and 2 bedroom affordable homes. Historically, most conversions have been delivered in Southport. This is also the area with the highest total need for affordable housing.

• A windfall contribution could also come forward from the following types of sites: pub closures, redevelopment of previously developed land in Green Belt (under NPPF para 89), employment sites outside of designated ‘Primarily Industrial Areas’, etc.

4.14 The Council receives a large number of requests for pre-application advice. Whilst this advice is confidential, the Council continues to receive a significant number on brownfield sites and back land sites that are not included in the SHLAA. Historically many of these have ended up with planning applications and permissions. This pattern is likely to continue.

4.15 Taken together, the above is considered to represent “compelling evidence” that windfall sites have consistently become available in the local area and will continue to provide a reliable source of supply into the future, as required by NPPF para 48. The Local Plan Inspector
assessed this approach in the 2015 SHLAA in the Local Plan examination and has accepted the approach.
5. **Assessment Review / 2017 SHLAA Findings**

5.1 The SHLAA findings are summarised in the table below. In total, the Study found that 10,879 dwellings could be accommodated in the urban area, after discounting and after deducting discounting.

5.2 As set out above, this supply does not necessarily include every site that will come forward for housing over the years ahead. The SHLAA will be updated annually to ensure that new sites can be taken into account as they become available.

5.3 There was a good level of completions from the previous year with a net figure of 607 homes. This has marked a big improvement from the figure of -157 from the previous year. A big part of the difference comes from the lack of demolitions this year compared to large scale demolition in 2015/16. And the completion of the conversion of Daniel House for 180 dwellings in 2016/17.

5.4 In relation to monitoring meeting the Local Plan targets, the gross number of completions from the start of the Local Plan period of April 1\textsuperscript{st} 2012 to March 31\textsuperscript{st} 2017 is 2,468. This measure up well against the Local Plan target for that period of 2,500 dwellings. However the net number of completions has been 1,655 and this leaves a shortfall of 845 dwellings. This is largely accounted for by the large number of demolitions due to housing market renewal and succession schemes which together amounted to 807 homes between 2012 and 2017.

5.5 The five year supply position is set out in the next section.
## 2017 SHLAA Findings and total Local Plan housing supply

**Summary of the net completions during the Local Plan period from April 1st 2012 to March 31st 2017**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Completions</td>
<td>466</td>
<td>331</td>
<td>650</td>
<td>393</td>
<td>628</td>
<td>2468</td>
</tr>
<tr>
<td>Demolitions</td>
<td>-54</td>
<td>-14</td>
<td>-174</td>
<td>-550</td>
<td>-21</td>
<td>813</td>
</tr>
<tr>
<td>Net completions</td>
<td>412</td>
<td>317</td>
<td>476</td>
<td>-157</td>
<td>607</td>
<td>1655</td>
</tr>
<tr>
<td>Local Plan Requirement</td>
<td>500</td>
<td>500</td>
<td>500</td>
<td>500</td>
<td>500</td>
<td>2500</td>
</tr>
<tr>
<td>Under/over provision</td>
<td>-88</td>
<td>-185</td>
<td>-26</td>
<td>-666</td>
<td>-971</td>
<td>-845</td>
</tr>
</tbody>
</table>

**Summary table of the 2017 SHLAA position**

<table>
<thead>
<tr>
<th></th>
<th>Year 1-5</th>
<th>Year 6-10</th>
<th>Year 11-15</th>
<th>Year 1-15</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sites with Planning Permission – Large and Strategic</td>
<td>1221</td>
<td>730</td>
<td>204</td>
<td>2155</td>
</tr>
<tr>
<td>Sites with Planning Permission – Small</td>
<td>517</td>
<td>0</td>
<td>0</td>
<td>517</td>
</tr>
<tr>
<td>Sites with Planning Permission – Large Conversion sites</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Sites with Planning Permission – Small Conversion sites</td>
<td>360</td>
<td>0</td>
<td>0</td>
<td>360</td>
</tr>
<tr>
<td>Demolitions on the above sites</td>
<td>-24</td>
<td>-24</td>
<td>-24</td>
<td>-24</td>
</tr>
<tr>
<td>Assessed sites</td>
<td>369</td>
<td>602</td>
<td>0</td>
<td>971</td>
</tr>
<tr>
<td>Allocated sites without Planning Permission</td>
<td>1395</td>
<td>3362</td>
<td>1285</td>
<td>6042</td>
</tr>
<tr>
<td>TOTAL</td>
<td>3838</td>
<td>4694</td>
<td>1489</td>
<td>10021</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Year 1-5</th>
<th>Year 6-10</th>
<th>Year 11-15</th>
<th>Year 1-15</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sites with Planning Permission – Large and Strategic NO DISCOUNT</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Sites with Planning Permission - Small 10% DISCOUNT</td>
<td>52</td>
<td>0</td>
<td>0</td>
<td>52</td>
</tr>
<tr>
<td>Sites with Planning Permission –Large Conversion sites NO DISCOUNT</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Sites with Planning Permission –Conversion sites 10% DISCOUNT</td>
<td>36</td>
<td>0</td>
<td>0</td>
<td>36</td>
</tr>
<tr>
<td>Demolitions on the above sites 10% DISCOUNT</td>
<td>-2</td>
<td>-2</td>
<td>-2</td>
<td>-2</td>
</tr>
<tr>
<td>Assessed sites 20% DISCOUNT</td>
<td>74</td>
<td>120</td>
<td>0</td>
<td>194</td>
</tr>
<tr>
<td>Allocated sites without Planning Permission NO DISCOUNT</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>TOTAL DISCOUNT</td>
<td>159</td>
<td>120</td>
<td>0</td>
<td>280</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Year 1-5</th>
<th>Year 6-10</th>
<th>Year 11-15</th>
<th>Year 1-15</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sites with Planning Permission – Large and Strategic</td>
<td>1221</td>
<td>730</td>
<td>204</td>
<td>2155</td>
</tr>
<tr>
<td>Sites with Planning Permission – Small</td>
<td>465</td>
<td>0</td>
<td>0</td>
<td>465</td>
</tr>
<tr>
<td>Sites with Planning Permission – Large Conversion sites</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Sites with Planning Permission – Small Conversion sites</td>
<td>324</td>
<td>0</td>
<td>0</td>
<td>324</td>
</tr>
<tr>
<td>Demolitions on the above sites</td>
<td>-22</td>
<td>0</td>
<td>0</td>
<td>-22</td>
</tr>
<tr>
<td>Assessed sites</td>
<td>295</td>
<td>482</td>
<td>0</td>
<td>777</td>
</tr>
<tr>
<td>Allocated sites without Planning Permission</td>
<td>1395</td>
<td>3362</td>
<td>1285</td>
<td>6042</td>
</tr>
<tr>
<td>TOTAL AFTER DISCOUNT IS APPLIED</td>
<td>3679</td>
<td>4574</td>
<td>1489</td>
<td>9742</td>
</tr>
<tr>
<td>Windfalls *</td>
<td>348</td>
<td>395</td>
<td>395</td>
<td>1138</td>
</tr>
<tr>
<td>TOTAL INCLUDING WINDFALLS</td>
<td>4069</td>
<td>4970</td>
<td>1884</td>
<td>10880</td>
</tr>
</tbody>
</table>
6. Sefton’s five year supply position at 1st April 2017

6. Introduction
6.1 The requirement to demonstrate a 5 year supply of housing land is set out in the Government’s ‘National Planning Policy Framework’ (NPPF). This requires that local authorities:

“identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land.” (para 47)

6.2 In addition, NPPF states that:

“Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites” (para 49)

6.3 Sefton’s housing target was formerly set at 500 dwellings per annum by the Regional Spatial Strategy for the North West (RSS). However, this was revoked on 20th May 2013.

6.4 The Council’s Local Plan has now been adopted. This includes a housing requirement of 640 dwellings per year. This requirement is broken down to 500 dwellings per annum between 2012-2017, and 694 per annum between 2017-2030. This requirement figure was derived from work produced on the Council’s behalf by Nathaniel Lichfield & Partners in December 2014. In this statement the Local Plan housing requirement has been used to calculate the 5 year supply. The sensitivity testing section of this statement sets out the implications for the 5 year supply of adopting an alternative requirement.

Calculating the 5 year requirement
6.5 The 5 year housing requirement is made up of the following parts. Further explanation regarding the ‘Under-provision since 2012’ and ‘20% buffer’ is set out below:

<table>
<thead>
<tr>
<th>Requirement for the next 5 yrs</th>
<th>5 years times the requirement for 694 dwellings per year.</th>
<th>3470</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under provision to date</td>
<td>Total; short of 845 divided up over the plan period.</td>
<td>282</td>
</tr>
<tr>
<td>Buffer size</td>
<td>20%</td>
<td></td>
</tr>
<tr>
<td>Addition to req from buffer</td>
<td>694</td>
<td></td>
</tr>
<tr>
<td>Total 5 yr requirement</td>
<td></td>
<td>4446</td>
</tr>
</tbody>
</table>
6.6 Since 2012, Sefton has under delivered against the draft Local Plan housing requirement. The extent of the under delivery has varied year on year and in 2016/17 the Council has exceeded the requirement figure. This under delivery is set out in the table below:

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
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<td>-666</td>
<td>-971</td>
<td>-845</td>
</tr>
</tbody>
</table>

6.7 The ‘Liverpool’ method has been used to apportion this historic under provision over the full 15 years of the Plan period. The Council is aware that many post-NPPF Planning Appeal decisions have required that local authorities include the entirety of the under-provision in the first 5 years (the ‘Sedgefield’ approach). However, the majority of post-NPPF Local Plan / Core Strategy Inspector’s reports that the Council is aware of have favoured the ‘Liverpool’ Approach. The Sefton Local Plan Inspector has agreed with the approach taken by Sefton.

6.8 In addition, whilst the current economic climate has affected housing completions nationally, there are also locally specific circumstances that support the use of the ‘Liverpool’ approach in Sefton. In particular, more than half of this under provision is due to the major demolition programmes that have taken place in Sefton, including the completion of the former New Heartlands Housing Market Renewal (HMR) programme. In total, there have been 333 demolitions associated with the completion of the HMR programme during 2015/16 and this added to 182 demolitions in years 2012/15. This has had a significant effect on the housing supply position, as each demolished property is counted as a ‘minus 1’ to the housing supply. The amount of demolitions is expected to fall sharply with the end of Housing Association and housing market renewal successor programmes.

6.9 Whilst in purely numerical terms these demolition and rebuild programmes have affected the housing land supply position, this ignores the significant regeneration benefits that have been secured. In addition, many of the demolished properties had been vacant for upwards of 5 years. Requiring the entirety of this numerical deficit to be made up in the 5 year period would be to penalise the Council for successfully delivering regeneration.

6.10 In addition, the Green Belt boundary is tightly drawn around the existing urban area and all countryside in the Borough is designated as Green
Belt. Sefton’s ability to make up the backlog of under-provision against the housing requirement is therefore contingent on the release of Green Belt sites for housing development through the Local Plan.

6.11 However, such sites have a significant lead in time and are not expected to deliver significant completions until 2019/20. This consideration supports the application of the ‘Liverpool’ method.

Buffer to the Supply - 5% or 20%

6.12 NPPF para 47 states that the 5 year supply requirement should include a 5% buffer “to ensure choice and competition in the market for land”. Where there has been a record of “persistent under delivery”, this buffer should be increased to 20%. However, NPPF does not define how “persistent under-delivery” should be measured.

6.13 Sefton’s delivery record since 2003 is set out in the 2015 SHLAA. The Council under-delivered against the former RSS housing target in all but one of the years between 2003 and 2012, and has not achieved the draft Local Plan housing requirement since 2012. It is therefore accepted that Sefton has ‘persistently under-delivered’ and a 20% is warranted.

6.14 The Local Plan inspector has not disagreed with the approach set out in the 2015 SHLAA and therefore this approach is consistent with that on both the Liverpool method and the 20% buffer.

Sites that meet the ‘5 year supply’ Criteria

6.15 NPPF places strict criteria for inclusion of sites in the 5 year supply, and requires that such sites are ‘deliverable’. This is defined at footnote 11, which states that to be ‘deliverable’ sites must be:

- Available now;
- Suitable now;
- Achievable, with a realistic prospect that housing will be delivered on the site within five years; and
- Viable.

6.16 Sites within the 5 year supply must meet all of these criteria.

6.17 The housing sites in Sefton that are considered to meet the 5 year supply criteria are made up of the following categories of site:

- Deliverable sites with planning permission for housing at 1st April 2016
- Deliverable sites without planning permission for housing at 1st April 2016
- Some proposed Local Plan housing allocations
- A windfall allowance (see Section 4 of the 2016 SHLAA)

Sites with Planning Permission for Housing at 1st April 2016

6.18 For sites with a current planning permission for housing, NPPF footnote 11 states that:
“Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.”

6.19 A schedule of sites with planning permission for housing, including assumed annual delivery rates, is set out in Appendix 1 of the 2016 SHLAA.

6.20 For larger sites (20+ dwellings) with planning permission, the developer/land owner was contacted to confirm their development intentions. These sites were only removed from the 5 year supply where the developer/landowner indicated that they would not be implementing the development (in whole or in part) within 5 years.

6.21 A small number of very large sites will be phased over a longer time period than 5 years. In these instances, the assumed contribution related to the proportion of the site that will be developed within the 5 year period, factoring in lead in times and upfront infrastructural requirements.

6.22 For smaller sites (less than 20 units) with planning permission, the developer/land owner was not contacted. Instead, an across-the-board discount of 10% was applied to the total supply from these sites, to reflect likely non-implementation rates. This approach is consistent with appeal decisions elsewhere, and the historic rate of non-implementation in Sefton.

6.23 For smaller sites, the lead in time from grant of permission to the delivery of completions was based on historic trends for similar sized sites.

Sites without Planning Permission for Housing at 1st April 2017
6.24 The vast majority of sites in the 5 year supply benefitted from planning permission for housing at 1st April 2016. However, a number of sites without planning permission have also been included in the 5 year supply. These sites have been assessed as being ‘deliverable’ in the 2017 SHLAA. A 20% discount was applied to these sites to reflect the greater uncertainty associated with sites without planning permission. Assessments of each of these sites are set out at appendix 2 of the SHLAA.

Proposed Local Plan Housing Allocations
6.25 In addition to the sites assessed in the SHLAA, 4 proposed Local Plan housing allocations are also included in the 5 year supply. These are sites not subject to restrictive policy designations in the Unitary Development Plan (such as Green Belt, etc) and are therefore capable of meeting the “suitable” test at the assessment base-date (1st April 2017). The phasing assumptions that have been applied from these sites is listed below. No discounting has been applied to the capacity from these sites:

Demolitions
6.26 In accordance with government guidance, known demolitions that will take place during the 5 year period have been subtracted from the projected
 completions. The 5 year supply is therefore based on ‘net’ housing stock change.

6.27 22 demolitions are forecast to take place during the 5 year period to 2020. These 22 demolitions relate to current planning permissions that propose to demolish or convert one or more dwellings as part of a redevelopment scheme (usually to provide new housing).

**Housing Supply Overview**

6.28 The following table provides an overview of Sefton’s supply of housing sites that are considered to meet the 5 year supply criteria:

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Sites with Planning Permission – Large and Strategic</td>
<td>334</td>
<td>216</td>
<td>262</td>
<td>232</td>
<td>177</td>
<td>1221</td>
</tr>
<tr>
<td>Sites with Planning Permission – Small</td>
<td>93</td>
<td>93</td>
<td>93</td>
<td>94</td>
<td>94</td>
<td>465</td>
</tr>
<tr>
<td>Sites with Planning Permission – Large Conversion sites</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Sites with Planning Permission – Small Conversion sites</td>
<td>65</td>
<td>65</td>
<td>65</td>
<td>65</td>
<td>64</td>
<td>324</td>
</tr>
<tr>
<td>Demolitions on the above sites</td>
<td>-22</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-22</td>
</tr>
<tr>
<td>Assessed sites</td>
<td>3</td>
<td>111</td>
<td>78</td>
<td>15</td>
<td>87</td>
<td>294</td>
</tr>
<tr>
<td>Allocated sites without permission</td>
<td>0</td>
<td>14</td>
<td>260</td>
<td>494</td>
<td>627</td>
<td>1395</td>
</tr>
<tr>
<td>Net Windfalls</td>
<td>0</td>
<td>-15</td>
<td>121</td>
<td>121</td>
<td>121</td>
<td>348</td>
</tr>
<tr>
<td>Total</td>
<td>495</td>
<td>499</td>
<td>899</td>
<td>1034</td>
<td>1180</td>
<td>4027</td>
</tr>
</tbody>
</table>

5 year housing requirement = 3,470
Under-provision since 2012 = 282
20% buffer = 694
**Total 5 year requirement = 4,446 dwellings**
Total supply = 4,027
= 4.5 year supply

6.29 Sefton is therefore unable to demonstrate a 5 year supply of ‘deliverable’ housing sites against the NPPF criteria. This triggers NPPF para 49, which in turn requires that planning applications for housing should be considered against the ‘presumption in favour of sustainable development’ (para 14).
Comparisons with 2016 5 year supply

6.30 The five year supply position has improved from 4.2 to 4.5 years supply. However a five year supply has not been achieved. The main factors impacting upon the five year supply position from 2016 to 2017 are as follows:

- The main factor in the rise in the amount of dwellings required from 4,255 to 4,446 dwellings is that all five years have a Local Plan requirement of 694 dwellings per annum. One of the years in the previous years supply had a requirement of 500. This also reflects in a slightly increased buffer.

- The supply position has improved due to a healthy number of completions in 2016/17 and some of the Local Plan sites progressing. That said, some of the sites have not progressed as quickly as we would have liked.

- It is anticipated that five year supply position should continue to improve as a large number of Local Plan sites start to progress.

Sensitivity Testing

6.31 The following scenario looks at the implications of applying the “Sedgefield” method where the backlog is met within the five year supply.

5 year housing requirement = 3,470
Under-provision since 2012 = 845
20% buffer = 694
Total 5 year requirement = 5,009 dwellings
Total supply = 4.027
= 4.0 year supply