2017

Barrow Borough Housing Land Statement





Barrow Borough Council

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Introduction

- 1.1 Local Authorities are required by the Government to identify the objectively assessed housing needs of their area and include a housing requirement in their Local Plan which sets out how many homes should be built over the Plan period.
- 1.2 They are also expected to identify sufficient deliverable sites to meet this requirement over a rolling 5 year period: this is the key purpose of the Housing Land Statement.
- 1.3 Barrow Borough Council (the Council) is in the process of producing its new Local Plan and will submit the Local Plan Submission Draft to the Planning Inspectorate later this year. The Draft Local Plan contains the housing requirement to cover the period 2014 to 2031.
- 1.4 Until the adoption of the new Local Plan, the draft housing requirement set out in the Council's SHMA Addendum 2017 document will be used when calculating the five year housing land supply. This requires at least 133 net additional dwellings per year to be built in the Borough over the plan period.
- 1.5 This document has a base date of 1st April 2017, meaning that it assesses the 5 year housing land supply at that point in time. The Council will identify sites to meet the requirement in years 6+ through the forthcoming Local Plan, which it intends to review regularly to ensure it is kept up-to-date.

What is the difference between OAN and the housing requirement?

- 1.6 OAN is the basic housing need which authorities must meet. It is a "policy neutral" figure which does not take into account whether a Borough can physically provide the required number of houses or whether the Council has further growth aspirations above and beyond the basic need.
- 1.7 Policy judgements should not be considered when identifying OAN although it must be noted that "when we assess future demand by projecting forward past trends, we also project forward the effect of those past constraints" including planning policies.
- 1.8 NPPG, paragraph 4, states that:

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¹ PAS Objectively Assessed Need and Housing Targets Technical Advice Note

- "The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans."
- 1.9 In cases where there is no housing requirement in an up-to-date Local Plan, then the OAN figure should be used when calculating housing land supply as demonstrated during the Gallagher Homes Ltd vs. Solihull Metropolitan Borough case in 2014 when the Inspector stated that:
 - "Where there is no Local Plan, then the housing requirement for a local authority for the purposes of paragraph 47 is the full, objectively assessed need."
- 1.10 The housing requirement is a "policy on" target which considers whether the OAN can actually be provided and whether there are justifications for the figure being above the OAN figure (e.g. if the Council has growth aspirations and OAN, which is trend based, is recessionary).
- 1.11 The housing requirement can also be lower than the OAN figure for example if there is an inability to deliver what is required due to a lack of infrastructure or a policy constraint such as a green belt. In these cases Councils must work with neighbouring authorities to determine whether they can absorb the unmet need.
- 1.12 Both the OAN and housing requirement must be set out in Council's Local Plans which should be "aspirational but realistic" and must be kept up-to-date. The NPPF, Para 16, however notes:
 - "A meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued." (NPPG Paragraph 16)
- 1.13 Both OAN and the housing requirement are identified and discussed in the Council's SHMA Addendum 2017, which was produced by ARC4 in March this year. The document also covers issues such as affordable housing and housing need in terms of the types of housing required. The housing requirement is discussed further on page 12.

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² NPPF Paragraph 154

The Housing Market Area

- 2.1 The NPPF states that assessments of housing need should be based on the appropriate housing market area.
- 2.2 NPPG paragraph 2a-010 defines a housing market area as
 - " a geographical area defined by household demand and preferences for all types of housing reflecting the key functional linkages between places where people live and work."
- 2.3 The Council's 2017 SHMA notes that:
 - "In establishing the extent to which Barrow-in-Furness Borough is a housing market area, house price, migration, travel to work and contextual data have been assembled in line with Planning Practice Guidance."
 - "The Department of Communities and Local Government (DCLG) suggests that a housing market is self-contained if upwards of 70% of moves (migration and travel to work) take place within a defined area. An analysis of 2011Census migration data suggests that 86.2% of households move within the Barrow-in-Furness Borough and 84.7% of residents in employment work within the Borough."
 - "Barrow-in-Furness Borough can be described as a self-contained housing market on the basis of migration flows and travel to work patterns."



Figure 1: Location of the Barrow Borough

Past Housing Delivery

Table 1: 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) ³	Net Additional Dwellings	Basic annual Housing Requirement (dwellings) ⁴	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	750*	
2009/10	138	81	65	14	0	51	750*	N/A
2010/11	28	28	124	43	40	81	750*	IN/ A
2011/12	102	104	52	123	121	-71	750*	
2012/13	97	97	55	11	10	44	-	
2013/14	77	77	76	3	0	73	-	
2014/155	39	39	117	1	0	116	133	-17
2015/16	353	324	91	0	0	91	133	-42
2016/17	72	72	68	1	0	67	133	-66
Total	1893	1570	1314	357	294	957	-	125
Average per annum	135	112	94	26	21	68	-	-

See Paragraph 3.4
 Before shortfall and 20% buffer added. See pages 16 & 17 for further information.
 Former RS target
 Start of emerging Plan period 2014/15 to 2030/31

400 350 300 No. of dwellings 250 200 150 Permissions 100 Completions 50 Demolitions 0 2005/06 2007/08 2008/09 2009/10 2010/11 2013/14 2006/07 **Monitoring Year**

Figure 2: Annual Housing Permissions and Completions

Planning Permissions

- 3.1 Table 1 and Figure 2 above show that between 2003/04 and 2016/17, the annual number of dwellings granted planning permission each year has ranged between 28 and 353. On average, 135 dwellings per year have been granted permission.
- 3.2 Over this period 83% of dwellings granted planning permissions were on unallocated sites. 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

3.3 Over the same period, the annual net number of dwellings completed each year has ranged between 52 dwellings and 165 dwellings. On average 94 dwellings have been completed each year. Since 2007/08 when monitoring began, the majority of dwellings built have been on windfall sites. Table 4 looks at windfall completions in more detail.

Demolitions

3.4 The number of demolitions per year has 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 1 identifies the number of non-HMR demolitions. The average number of non-HMR demolitions per year is 5 dwellings.

Net Additional Dwellings

- 3.5 Table 1 shows that the number of net additional dwellings was at its peak in 2014/15 (116 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 housing clearance under the HMR scheme.
- 3.6 On average, the number of net additional dwellings per year is 68. This figure would be higher if housing demolitions linked to the housing market renewal scheme were excluded from the calculations.

Past Build Rates on Larger Sites

- 3.7 Table 2 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, how many dwellings were approved 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.
- 3.8 The table is based on Building Control completions. In some cases, the number of dwellings a developer considers to be complete on site may differ as they may have a different definition of "complete".
- 3.9 The table shows that delivery rates between sites differs significantly, with the average number of dwellings completed on sites ranging from 0 per year to 13. The highest number of dwellings completed on a site in one year was 26 at Listers North in 2014/15.

Table 2: Historic Build Rates on Larger Sites - Barrow Borough

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).

Site Name and total no. approved	Monitor	onitoring Year and number of dwellings completed (according to Building Control Completion records).												
	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	Left to complete	Annual Average
Listers North 168 dwellings	9	18	26	10	12	13	12	14	9	26	2	4	13	13
Holbeck Phase 3 106 dwellings		5	15	13	14	5	5	6	4	17	12	5	5	10
Holker St 63 dwellings					July 2009			1	10	7	23	18	4	10
Former North Lonsdale site 41 dwellings								0	6	0	3	-	32	2
Roose Garden Centre 32 dwellings									1	1	1	3	26	2
Channelside/ Strand Engineering 57 dwellings					June 2009								57	0
Thorncliffe North 11dwellings										Dec 2014		4	7	4
Thorncliffe South 29 dwellings											Nov 2015		29	0
Urofoam 12 dwellings					Oct 2009						2	5	5	4

Site Name and total no. approved	Monito	Monitoring Year and number of dwellings completed (according to Building Control Completion records).												
	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	Left to complete	Annual Average
Former Parkview School 54 dwellings											June 2015		54	0
Former Vickerstown School 22 dwellings								Oct 2012 12	7	3	-	-	0	7
Bradford Street 16 dwellings							May 2011 12	4	-	-	-	-	0	8

The Housing Requirement

- 4.1 The PPG (paragraph ID3-030-2014D306) states that housing requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the five year supply. The PPG goes on to state that
 - "where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered. But the weight given to these should take account of the fact that they have not been tested or moderated against relevant constraints."
- 4.2 The Council is currently producing its new Local Plan which will identify the OAN figure and the housing requirement over the Plan period (2014 to 2031). The saved policies in the current Local Plan do not contain an up-to-date housing requirement therefore in the interim period until the adoption of the new Plan, the supply should be assessed against the OAN figure identified in the SHMA Addendum 2017.
- 4.3 The SHMA Addendum identifies a housing need ranging between 65 dwellings and 133 dwellings per annum. The Council sees no reason to set its housing requirement higher or lower than the maximum OAN figure. The housing requirement therefore being taken forward through the emerging Local Plan is for a minimum of 133 net additional dwellings to be added to the stock per annum.
- 4.4 Whilst it is accepted that the draft housing requirement has not been through independent examination at this stage, it is based upon the most up-to-date evidence available and uses the 2014 CLG household projections as a starting point. The SHMA Addendum captures the impacts of past underprovision therefore there is no need to include any under-provision against previous targets (set out in the revoked Regional Strategy).

Housing to Support Economic Growth across Cumbria

- 4.5 The proposed level of housebuilding would support anticipated economic growth and job creation in the Borough. Further information regarding this issue can be found in the 2017 SHMA Addendum.
- 4.6 At the county level, the Cumbria Local Economic Partnership (LEP) has produced the Four Pronged Attack (Cumbria Strategic Economic Plan 2014-2024), produced in March 2014, which contains the following vision for Cumbria's economy:
 - "The vision is for Cumbria to have one of the fastest growing economies in the UK, in an energised and healthy environment. Our economy is complex and

diverse, encompassing world-class engineering, manufacturing and energy companies alongside high-quality food and drink companies and a unique and unparalleled visitor offer. This diversity is part of Cumbria's strength and has offered resilience and adaptability through the recent difficult global economic challenges and will continue to provide the springboard for economic growth."

- 4.7 It intends to meet this vision by delivering the following objectives by 2024:
 - o Creating 15,000 additional full time equivalent jobs
 - Boosting Cumbria's economy by £600m more than current predictions through targeted investment in key projects
 - o Increasing the county's GVA growth by 0.6 percentage points above current forecasts, yielding a GVA growth rate of 2.2% during the plan period
 - Supporting the local planning authorities to deliver 20,000 new homes through their local plans
 - Raising the skill levels through working with local education and training providers, reducing the proportion of Cumbria's firms facing a skills gap by 3%
 - o Increasing visitor expenditure by over £500m
 - Increasing the number of businesses reporting growth by 5% through the Cumbria Growth Hub support
 - o Achieving 100% coverage of superfast broadband
- 4.8 The Economic Plan recognises the importance of the Furness area stating that:
 - "Although manufacturing is important across the whole county, the sector has a significant concentration in the Furness peninsula. Investment proposals from major international blue-chip companies are set to create 3,000 jobs in the Barrow and Ulverston area. This includes a £350m investment by GSK in a new biopharma plant at Ulverston, creating 300 new jobs by 2021, and the investment of more than £300m at Barrow shipyard in the Successor Deterrent Programme, which is expected to create approximately 1,000 new jobs by 2020 and generate £4billion of GVA for Barrow and £7 billion for the rest of the UK."
- 4.9 More recently the Local Economic Partnership has produced its Skills Investment Plan 2016 to 2020 which describes the key challenges the county faces in terms of supporting economic growth:
 - "An estimated 65,000 jobs will need to be filled in Cumbria between 2016 and 2021 inclusive as a result of replacement demand, i.e. retirements, occupational mobility and outward migration. On top of this, the number of new jobs in the nuclear sector driven by the proposed new build

programme at Moorside- is likely to be around 7,300 over the same period, whilst a further 6,500 new jobs could be created through general economic growth and other (non-nuclear) programmes of investment. In total therefore, an estimated 80,300 jobs will need to be filled in Cumbria between the start of 2016 and the end of 2021.

- "As things stand, Cumbria is not well placed to meet this challenge. By way of illustration, if the county achieved an employment rate of 78% (making it one of the highest performing LEP areas in the country) and if we maximised the employment potential of the young people that we expect to enter the working age population over the next five years, we would be able to fill an estimated 24,000 jobs. That is just 30% of the total challenge. Fundamentally, Cumbria needs more residents of working age to sustain current levels of economic performance and to provide the foundation for growth"
- 4.10 In terms of reducing the percentage of economic inactivity, the LEP Employment and Skills Commission has a target to be achieved by 2020.
 - "These targets have been informed by assessments of need (in the context of Cumbria's future employment and skills challenge) and achievability. Target 6: The county-wide employment rate will be at least 78% (with a focus placed on improving the employment rate in those wards and districts where it is currently lowest)."
- 4.11 Barrow Borough Council is also committed to sustainable, economic growth. Its key priorities are set out in the Council Priorities 2014-2016 document, one of which relates to the local economy:
 - "The Council is committed to work on mitigating the effects of cuts in public spending, their impact on the local economy and working to secure a long term economic recovery for our community."
- 4.12 It is also committed to the development of the Barrow Waterfront area, which is a key priority in the Council's Barrow Port Area Action Plan, adopted in 2010. Considerable public investment has already been made in this area, which will be established as the LEP's Enterprise Zone and which the LEP Economic Plan states will involve the following key activities:
 - Securing BAE as an anchor tenant at Barrow Waterfront developing
 4.9ha of vacant employment land,
 - Using Cumbria Infrastructure Fund and Local Growth Funding to undertake ground works and servicing for the next phase of development. The overall site area being released is some 12ha and can accommodate over 1,600 jobs through investment from supply chain businesses,
 - Delivering infrastructure to stimulate private sector investment to deliver high quality housing,

- Recycling HCA receipts and income and provide rate relief to new businesses on the site,
- o Preparing a Local Development Order.
- 4.13 Since the Economic Plan was produced BAE have commenced development at Waterfront Business Park and work has begun to facilitate infrastructure improvements in the vicinity of the Marina Village site.

The Five Year Housing Land Supply

5.1 The NPPF requires Local Authorities to:

"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. Where there has been a persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land."

5.2 Where Councils fail to do this their local planning policies relevant to the supply of housing are considered to be "out of date". This may result in the approval of less sustainable developments.

What is a "deliverable" site?

5.3 The NPPF, footnote 11, states that:

"To be considered deliverable, sites 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 and in particular that development of the site is viable. 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."

5.4 Definitions of available, suitable and achievable can be found in the glossary at the end of this document.

What Type of Sites Make up the Supply?

- 5.5 The Council's five year housing land supply contains the following types of sites. These are looked at in more detail on pages 21-28:
 - Sites with extant permission for housing at end March 2017 (excluding those which are not considered to be deliverable);
 - Other deliverable sites without planning permission at end March 2017 (including existing allocations, sites awaiting \$106 Agreements and sites

⁶ NPPF Para 49. NPPF Paragraph 49

within the emerging Local Plan which meet the tests of deliverability); and

 Unidentified windfall sites over and under 0.1 hectares (the windfall allowance)

What if targets are not met?

Historic Shortfall/under-supply

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. This was confirmed in a recent 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 Fast Plan."

Several other cases also suggest that the former housing requirement, set out in the Regional Strategy is no longer relevant⁸.

- 5.7 Instead, the shortfall should be calculated from the start of the plan period; in this case, shortfall since the start of the emerging plan period in 2014 has been considered as this aligns with the CLG household projections used to calculate OAN. It is acknowledged that the emerging Plan has not yet been through examination, however this date has been used as a baseline in the absence of a housing requirement in the current Local Plan.
- 5.8 There are two methods for dealing with shortfall which have been accepted by the Planning Inspectorate. The "Liverpool" method, which spreads any shortfall over the full plan period and the "Sedgefield" method, which sees the shortfall "made up for" in the first five years by adding it to the basic

⁸ Hunston Properties Ltd (2013) EWCA Civ 1610 (2014) JPL 599, Kay and Ryder LJJ, Sir David Keane; R (Smech Properties Ltd) v Runnymead Borough Council (2015) EWHC 823 (Admin), Patterson J; South Northamptonshire Council V SOS (2014) EWHC 573 (Admin) Ousley J

⁷ Zurich Assurance Limited v Winchester City Council and South Downs National Park Authority (2014) EWHC 758 (Admin) 18th March 2014.

- requirement over that period. Both are identified by DCLG as examples of good practice. In order to deal with the shortfall against the requirement quickly, the Council has uses the Sedgefield method.
- 5.9 Since the start of the plan period, there has been a shortfall of 125 dwellings against the draft requirement (see Table 1).

20% buffer

- 5.10 The NPPF, paragraph 47, states that local planning authorities should add:
 - "...an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land."
- 5.11 Since monitoring began the number of net additional dwellings added to the stock has fallen below the housing requirement in place at that time. The Council therefore considers there has been a "record of persistent under delivery" under the NPPF definition and adds 20% to the 5 year housing requirement.
- 5.12 There is no policy or guidance on the matter of *when* the buffer should be added, although case law suggests that it should be added *after* adding together the 5 year requirement and the backlog. The Council therefore follows this approach.

How many dwelling are likely to be built on each site over the five years?

- 5.13 There is always an element of uncertainty when calculating how many dwellings will be completed on individual sites. Estimates have to be made based on information such as developer's phasing schemes and where this is lacking, past trends shown in Table 3.
- 5.14 Developers have been contacted on larger sites with planning permission to determine how many dwellings they expect to complete within the 5 year period. Where information has been provided this is identified in Appendix A (list of extant permissions).
- 5.15 Where this information is unavailable, an average of 13 dwellings per year per site has been used when projecting future delivery. This is based on a midpoint between the highest and lowest number of dwellings completed on one site in an individual year (see table 2). It also reflects average build rates on one of the Borough's largest sites, Listers North, which has been under construction over at least 10 years which includes periods of economic

recession and growth. The "13 dwellings per year" baseline is likely to be an under-estimate of future build rates as demand is likely to grow over the 5 year period in line with economic projections.

Does the Council apply a non-implementation deduction?

- 5.15 A number of Councils deduct a percentage from their housing land 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 a requirement 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.
- 5.16 This stance has been supported recently on appeal.9
- 5.17 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, whether the consent has been superseded by a permission for an alternative use or whether the site is being marketed for such. Where there is evidence that the permission is unlikely to be implemented over the 5 year period, the site is excluded from the supply.
- 5.18 A number of sites are identified in Appendix A as falling within this category, for example Brady's, Barrow which has an extant planning permission for 84 dwellings and Buxton Street, Barrow which has an extant permission for 18 dwellings have been excluded but *could* come forward over the next five years. A cautious approach however has been taken as evidence suggests delivery is unlikely.
- 5.19 Given this, it is not considered necessary to reduce the supply to take into account non-implementations, providing that each site in the supply meets the tests of deliverability and that sites where development is unlikely to be implemented over the 5 year period (but which could be in the future) have been removed.

How much of a housing land supply can the Council demonstrate?

5.20 The following table summarises the five year housing land supply. It shows that 1158 dwellings (net additional) could be completed on the sites identified in this document over the five year period beginning 1st April 2017.

⁹ APP/A0665/A/14/2214400: APP/A0665/A/14/2224763

- 5.21 Over the same period there is a need for at least 948 dwellings to be built in the Borough, which equates to 190 net additional dwellings per year.
- 5.22 This demonstrates that at the 1st April 2017, the Council had a **6.1 year supply** of deliverable housing sites (1093/190). Each type of site listed in Table 3 below is now looked at in turn.

Table 3: Five Year Supply and Requirement Summary at 1st April 2017

Supply (dwellings	s) - 2017/18 to	2021/22		Requirement (dwellings) - 2 2021/22	2017/18 to	
Extant Permissions (dwellings deliverable within 5 years)	See Page 21 & Appendix A	528		Basic requirement (133 dwellings) x 5 years	See page 12	
Other Deliverable Sites without planning permission.	See Table 4	505		Shortfall since 2014/15	See pages 17-18	
Emerging Allocations (contrary to current policy)	See Page 23	0		20% buffer	See page 18	
Future Windfall Sites under 0.1 hectares ¹⁰	See pages 29-30	66				
Future Windfall Sites over 0.1 hectares ¹¹	See pages 29-30	84				
Demolitions ¹²	See page 8	-25				
Net Additional				Overall Requirement		
Dwellings (total)	llings (total) 1158 5 year re		5 year requirement (annual)			

¹⁰ Average completions on such sites (reduced by 10% for garden sites) equates to 22 dwellings per annum. No windfall allowance is made for years 1-2 to avoid double counting.

¹¹ Average completions on such sites equates to 28 dwellings per annum. No windfall allowance is made for years 1-2 to avoid double counting. No reduction for garden sites has been made as these tend to be below 0.1 ha.

tend to be below 0.1 ha.

12 Average (non-housing market renewal) demolitions equates to 5 dwellings lost per year through demolition.

Sites with Extant Permission

- 6.1 46% of sites within the 5 year housing land supply already benefit from planning permission and are considered to be deliverable. A full list of sites with extant permission and the number of dwellings each contributes to the supply is included in Appendix A.
- 6.2 As Appendix A shows, development has commenced on the majority of these sites and developers have submitted details of the anticipated numbers of completions over the 5 year period. These do not always match council records as different methods of recording completions are used (the Council relies on Building Control completion records, whereas developers often use other methods).
- 6.3 Two large sites are included in the list as they benefit from planning permissions but have not been included in the housing land supply due to uncertainty over deliverability within the 5 year period in line with the Council's cautious approach (Brady's Yard, Buxton St).

Other Deliverable Sites

- 7.1 There are a number of sites which have been identified through the Local Plan process which are considered to be deliverable and which could come forward prior to the adoption of the emerging Local Plan. These "Other Deliverable Sites" include existing and emerging allocations without planning permission and represent 44% of the five year housing land supply (see Table 4).
- 7.2 Planning Practice Guidance (PPG) (ID3-D31-20140306) is clear that planning permission or allocation in a Development Plan is not a prerequisite for a site being deliverable in terms of the five year supply. If there are no significant constraints (e.g. infrastructure) to overcome, unallocated sites or those without permission can be considered deliverable.
- 7.3 In the decision at St Modwen Developments (2016) EWHC Ouseley J, it was stated that:
 - "The planning judgement as to "deliverability" can clearly be made in respect of sites which do not have planning permission now, but can reasonably be expected to receive it so as to enable housing to be built on them within the next five years."
- 7.4 When determining whether sites are deliverable, the tests of suitability, availability and achievability have been applied. The sites identified are considered to be available and suitable: their development would be in accordance with existing national and local planning policy and the emerging Local Plan which will be submitted to the Planning Inspectorate later this year.
- 7.5 In terms of achievability, the NPPF states that there should be a "reasonable prospect that housing will be delivered on the site at a particular time." (emphasis added). This is essentially a judgement about economic viability. Constraints to development (which may affect a site's viability) are listed in the Council's Site Assessments document. These have been considered when determining whether there is a reasonable prospect that a site is economically viable along with the Local Plan Viability Study.
- 7.6 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. Delivery timescales from developers are used where these have been provided. Where this is the case this is noted in Table 4. Where this information is not available, an estimation of lead in times is made. Generally two years lead in time is allowed, with dwelling completions in years 3-5 in most cases.

Existing Allocations

- 7.7 The five year land supply contains one site which is allocated for housing in the current Local Plan but which does not benefit from planning permission at present: SHL005, Crooklands Brow. The Council considers the site to be deliverable.
- 7.8 The supply also contains one site which is allocated for housing in the Barrow Port Area Action Plan 2010 (BPAAP) but which does not benefit from planning permission at present: SHL001, Marina Village.
- 7.9 In terms of Marina Village, there has been slippage against the delivery timescales set out in the BPAAP, however a number of steps have been taken to enable the delivery of housing on site since its allocation and its development remains a Council and Local Enterprise Partnership priority.
- 7.10 Given the size of the Marina Village site it is likely that development will take place in phases. Whilst the site is allocated for 650 dwellings, only a small percentage is likely to be delivered in the later stages of the 5 year period.
- 7.11 A list of evidence to support the inclusion of these two sites in the supply is listed in Table 4. Both sites are being taken forward as an allocation in the emerging Local Plan.

Emerging Allocations

- 7.12 The Council has only included emerging allocations in the supply where they are deliverable and could be brought forward under current local planning policy. A number of other emerging allocations have been excluded as they are contrary to saved policies, however they could contribute to the housing supply in future monitoring years following the adoption of the new Local Plan.
- 7.13 Two of the larger sites within this category (Sherbourne Avenue and Meadowlands Avenue) already benefit from planning consent. At the HLS base date the Meadowlands Avenue site was subject to a Section 106 Agreements, however this has now been signed and the permission has been issued. The developer of Sherbourne Avenue has applied to increase the number of units from 93 to 100. This later application is awaiting completion of a 106Agreement however the developer is proceeding under the earlier consent in the meantime.
- 7.14 The inclusion of emerging allocations is supported by the courts. In the decision at St Modwen Developments (2016) EWHC Ouseley J, it was stated that:
 - "I can see no planning rationale for depriving the planning authority and Inspector of the opportunity to reach a judgement on the general criteria for

deliverability on sites in an emerging local plan. Planning permission clearly goes to the issue of deliverability because a site with permission is suitable for housing development, and a barrier to delivery has been removed. But it cannot sensibly be argued that planning permission is required now for a site to be realistically deliverable over the next five years."

7.15 A number of the sites in this category are subject to objections which have been received through the emerging Local Plan process. Objections from statutory consultees are listed along with details of constraints in the Council's Site Assessments document. The nature and substance of the objections has been taken into account when deciding whether the site offers a suitable location¹³.

¹³ See Wainhomes Holdings Ltd (2013) EWHC 597 Stuart-Smith J

Table 4: Other Deliverable Sites

Site Ref.	Address	Notes	Evidence to Support Inclusion within Supply	Proposed Indicative Yield in Emerging Local Plan	Potential no. of dwellings which could be completed within 5 year period
	Sherborne Ave, Barrow	Privately owned site, under construction. Two planning applications approved on completion of a 106 Agreement on different parts of the site: 2016/0902: (31 dwellings) and 2016/0902 (69 dwellings). Consent (outline & RM) for 93 dwellings previously granted. Delivery timescales provided by developer.	 Report to Planning Committee Planning applications Developer's delivery timetable 	N/A	100
SHL103	Land off Meadowlands Ave, Barrow	Privately owned site. Planning permission approved May 2016 on completion of a 106 Agreement. Work has now commenced on site following signing of agreement and permission has been issued. Delivery timescales provided by developer stating an 18 month build out period.	 Emerging Local Plan and evidence base Report to Planning Committee Planning application 	N/A	4414
SHL001	Marina Village, Barrow	Site owned by Barrow Borough Council, allocated for 650 dwellings in the Barrow	Emerging Local Plan evidence base	650	65

¹⁴ Indicative yield in Local Plan Publication Draft is 42 dwellings, however at the HLS base date the Council had resolved to grant planning permission for a revised scheme on completion of a \$106 obligation (planning application 2016/0116). This is the number likely to be developed.

		Port Area Action Plan 2010. Proposed allocation in the emerging Local Plan. Access works have consent and work has commenced. Delivery timescales estimated. Given on site constraints a 3 year lead in time has been allowed, with completions in years 4, 5 and 6+.	 Barrow Port Area Action Plan Homes & Communities Agency emails Planning application 2016/9002 (access) Press articles 		
REC19b	Thorncliffe South (tennis courts/field section)	Site owned by Cumbria County Council. Proposed Allocation in the emerging Local Plan. Delivery timescales estimated. A 2 year lead in time has been allowed with completions in years 3-5.	 Emerging Local Plan and evidence base Letter of intent from landowner Developer's delivery timetable 	35	35
SHL047	North Central Clearance Area, Barrow	Site owned by Barrow Borough Council. Proposed Allocation in the emerging Local Plan. Delivery timescales estimated. A 2 year lead in time has been allowed with completions in years 3-5 and 6+.	 Emerging Local Plan and evidence base Ground investigation report BBC development brief Reports to Executive Committee re sale of site Correspondence with potential developers 	4515	39
SHL070a	Land to South of Abbey Meadow, Barrow	Site owned by Barrow Borough Council. Proposed Allocation in the emerging Local Plan. Delivery timescales estimated. A 2 year lead in time has been allowed with	 Emerging Local Plan evidence base BBC development brief Report to Executive Committee re. sale of site 	26	26

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¹⁵ Indicative yield based on an average of 30dph. Previous discussions with developers have indicated that a higher yield may be sought at planning application stage.

		completions in years 3-5.			
SHL100a	Land North of Westpoint House, Solway Drive, Walney	Site owned by Barrow Borough Council. Proposed Allocation in the emerging Local Plan. Delivery timescales estimated. A 2 year lead in time has been allowed with completions in years 3-5.	 Emerging Local Plan and evidence base BBC development brief Report to Executive Committee re. sale of site 	30	30
SHL101	Land South of Westpoint House, Solway Drive, Walney	Site owned by Barrow Borough Council. Proposed Allocation in the emerging Local Plan. Delivery timescales estimated. A 2 year lead in time has been allowed with completions in years 3-5.	 Emerging Local Plan and evidence base BBC development brief Report to Executive Committee re. sale of site 	28	28
SHL013b	Former Candleworks site (South), Schneider Rd, Barrow	Privately owned site. Proposed Allocation in the emerging Local Plan. Delivery timescales estimated. A 2 year lead in time has been allowed with completions in years 3-5.	Emerging Local Plan and evidence base	32	32
SHL037	E5 Land South of Ashley & Rock, Park Rd, Barrow	Privately owned site. Proposed Allocation in the emerging Local Plan. Delivery timescales estimated. A 2 year lead in time has been allowed with completions in years 3-5 and 6+.	 Emerging Local Plan and evidence base Letter of intent from landowner 	77	39
REC02	Duke St, Askam	Privately owned site. Proposed Allocation in the emerging Local Plan. Delivery timescales estimated. A 2 year lead in time has been allowed with completions in years 3-5.	 Emerging Local Plan and evidence base Letter of intent from landowner 	9	9
SHL017	Urofoam Factory, Askam (excluding parts with	Privately owned site. Proposed Allocation in the emerging Local Plan.	Emerging Local Plan and evidence basePre-application	51	26

	planning permission)	Delivery timescales estimated. A 2 year lead in time has been allowed with completions in years 3-5 and 6+.	submission • Developer's delivery timescales						
SHL005	Crooklands Brow, Dalton	Privately owned site. Existing housing allocation in current Local Plan for 60 dwellings and being taken forward as an allocation in the emerging Local Plan. Delivery timescales estimated. A 2 year lead in time has been allowed with completions in years 3-5.	 Emerging Local Plan and evidence base Letter of intent from landowner/developer 	32	32				
Total									

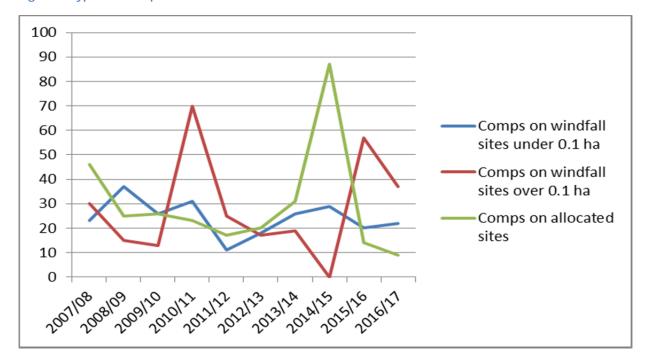
Windfall Sites

- 8.1 Windfall sites are those which have not specifically been identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.
- 8.2 The NPPF, paragraph 48, states that:
 - "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."
- 8.3 Table 5 shows how many dwellings have been completed on windfall sites, above and below 0.1 hectares, since 2007/08. As shown, the majority of completions over that period (64%) have been on such sites. 30% of all completions over that period were on small windfall sites below 0.1 hectares in size.

Table 5: Completions on Windfall Sites

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
2007/08	99	23	23%	30	30%	46	47%
2008/09	77	37	48%	15	20%	25	33%
2009/10	65	26	40%	13	20%	26	40%
2010/11	124	31	25%	70	57%	23	19%
2011/12	52	11	21%	24	48%	17	33%
2012/13	55	18	33%	17	31%	20	36%
2013/14	76	26	34%	19	25%	31	41%
2014/15	117	30	25%	0	0%	87	74%
2015/16	91	20	22%	57	63%	14	15%
2016/17	68	22	32%	37	54%	9	13%
Total	824	244 (30%)	-	282 (34%)	-	298 (36%)	-
Ave.	82	24	-	28	-	30	-
Ave. minus 10% for res. gardens	-	22	-	N/A	-	-	-

Figure 3: Types of Completion



- 8.4 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.
- 8.5 Table 5 and Figure 3 suggest that there is no strong correlation between the development of allocated and windfall sites; i.e. completions continued to come forward on larger windfall sites whilst allocated sites were also under construction.
- 8.6 The Council is also aware of a number of potential large windfall sites which are not already included in the supply which would help deliver housing over the five year period. 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.
- 8.7 The Council therefore predicts the average number of dwellings developed on windfall sites in the past will continue to be completed over the 5 year period, although in the longer term there may be a reduction in developments on larger windfalls sites when completions on newly allocated sites reach their peak. This is an issue the Council will continue to monitor.
- 8.8 In terms of the sites under 0.1 hectares, 10% is deducted from the small windfall site allowance to take into account historic completions on garden sites in line with the NPPF. No deductions have been made to the windfall allowance for sites over 0.1 hectares.

Conclusions

- 9.1 The Council's SHMA Addendum recommends a draft housing requirement of 133 dwellings per annum over the plan period 2014/15 to 2030/31. This is the figure which will be taken forward through the emerging Local Plan and which is used in this document to calculate housing land supply. It is also the highest in the range of OAN figures identified by Arc4 and supports anticipated jobs growth in the Borough.
- 9.2 As the number of net additional dwellings has fallen below the requirement since the start of the Plan period in 2014, the shortfall and a 20% buffer (brought forward from later in the Plan period) is applied. This gives an overall requirement for 948 dwellings to be built between 2017/18 and 2021/22, which equates to an annual requirement for 190 net additional dwellings per year over that period.
- 9.3 This document demonstrates that there are sufficient deliverable sites to provide 1158 net additional dwellings over the 5 year period, when an allowance is made for the development of windfall sites in years 3-5.
- 9.4 The Council can therefore demonstrate a **6.1 year supply** of deliverable housing sites, meaning that its policies relating to the provision of housing are robust, where they accord with the NPPF.

Appendix A

Extant Permissions at 1st April 2017

Site Name	Planning App. Ref.	Date of Expiry of Consent : N/A if under construction	Application Type	Allocated in the Dev Plan	Site progress	No. dwellings left to complete at end 16/17	No. dwellings likely to be completed in 5 year period	Larger Sites Delivery Timetable received from developer/ landowner
Sites Over 0.1 Hectares								
Holbeck Park Phase 3, Barrow	Various	N/A	Various	Yes	Under Construction	5	5	Yes
Listers North, Flass Lane, Barrow	Various	N/A	Various	Yes	Under Construction	13	13	Yes
Former Arlington House, Abbey Rd, Barrow	2014/0650	N/A	Full	No	Under Construction	7	7	Unavailable
Former Parkview School, West Avenue, Barrow	2014/0392	25-Jun-18	Full	No	Under Construction	54	54	Yes
Former Roose Garden Centre, Flass Lane	Various	N/A	Various	No	Under Construction	26	26	Yes
Holker St (St James Gardens), Barrow	Various	Various	Various	No	Under Construction	4	4	Yes

Site Name	Planning App. Ref.	Date of Expiry of Consent : N/A if under construction	Application Type	Allocated in the Dev Plan	Site progress	No. dwellings left to complete at end 16/17	No. dwellings likely to be completed in 5 year period	Larger Sites Delivery Timetable received from developer/ landowner
Land at Park Lane (Kingsdown Mews)/ Vickerstown WMC, Barrow	2015/0293	22-Jul-18	Full	No	Under construction	8	8	Yes
Duddon Rd (Urofoam), Askam	2012/0303 & 2012/0302	N/A	RM	No	Under construction	5	5	Yes
North Lonsdale Hospital, School St, Barrow	2011/0292	N/A	Full	Yes	Under Construction	32	32	Yes
Land off Sherborne Ave, Barrow	Various	N/A	Outline	No	Under Construction	0 (permission superseded by later permissions totalling 100 dwellings. See Table 4)	0 (permission superseded by later permissions totalling 100 dwellings. See Table 4)	Yes
Strand Engineering North West (Channelside), Ironworks Rd, Barrow	2012/0377	N/A	Full	Yes	Under Construction	57	57	Yes
Thorncliffe North Site, Thorncliffe Rd, Barrow	2014/0525	N/A	Full	No	Under Construction	7	7	Yes
Thorncliffe School (South Site), Thorncliffe Rd, Barrow	2015/0642	02-Nov-18	Full	No	Under Construction	29	29	Yes
143 Salthouse Road, Barrow	2007/1100 & 2004/0725	N/A	RM Full	No	Under Construction	9	9	Unavailable

Site Name	Planning App. Ref.	Date of Expiry of Consent : N/A if under construction	Application Type	Allocated in the Dev Plan	Site progress	No. dwellings left to complete at end 16/17	No. dwellings likely to be completed in 5 year period	Larger Sites Delivery Timetable received from developer/ landowner
11 Smallholdings & land adjacent to Duchy Court, Barrow	2015/0110	05-Jan-19	Outline	No	Not Started	30	30	Unavailable
Bradys Yard (Former), Wilkie Rd, Barrow	2014/0360	23-Sep-18	Outline	No	Not Started	84	0	N/A
Barn at Longlands Farm, Urswick Rd, Dalton	2012/0784 & 2014/0600	N/A	Full & Prior Approval	No	Under Construction	4	4	N/A
Barns adjacent to Park Farm, Thwaite Flat, Barrow	2005/1287	N/A	Full	No	Under Construction	1	1	N/A
Cavendish Villas, Cavendish Park, Barrow	2016/0026	16-Aug-19	Full	No	Not Started	23	23	Yes
Cemetery Cottages Club, Schneider Rd, Barrow	2015/0277	16-Sep-18	Outline	No	Not Started	8	8	Yes
Former Yard and Garage, Elm Rd, Barrow	2005/1856	N/A	Full	No	Under Construction	1	1	N/A
George Hotel, Walney	2014/0608	N/A	Full	No	Under Construction	2	2	N/A

Site Name	Planning App. Ref.	Date of Expiry of Consent : N/A if under construction	Application Type	Allocated in the Dev Plan	Site progress	No. dwellings left to complete at end 16/17	No. dwellings likely to be completed in 5 year period	Larger Sites Delivery Timetable received from developer/ landowner
Land adjacent to 24 Leighton Drive, Barrow	2010/1492	N/A	Full	No	Under Construction	2	2	N/A
Land adjacent to 30 Hall Garth, Barrow	2008/0935	N/A	Full	No	Under Construction	1	1	
Land at Elliscales, Askam Rd, Dalton ¹⁶	2013/0354	N/A	Full	No	Under Construction	1	1	
Land off Lord St, Askam	2014/0452	N/A	Full	No	Under Construction	4	4	
Land to rear of 2-12 Inglewood, Barrow	2009/1990 & 2009/10	N/A	RM	No	Under Construction	1	1	
Land at Piel View Farm, Biggar Village, Barrow	2009/2152	N/A	Full	No	Under Construction	2	2	
Marsh Grange Farmhouse	2015/0598	14-Dec-18	Prior Approval	No	Not Started	2	2	

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¹⁶ This relates to a separate part of the site to development listed on page 37.

Site Name	Planning App. Ref.	Date of Expiry of Consent : N/A if under construction	Application Type	Allocated in the Dev Plan	Site progress	No. dwellings left to complete at end 16/17	No. dwellings likely to be completed in 5 year period	Larger Sites Delivery Timetable received from developer/ landowner
Plant Technical Offices, Buxton St, Barrow	2008/1005	N/A	Full	No	Under Construction	18	0	
Police Station, Station Close, Dalton	2014/0124	N/A	Full	No	Under Construction	1	1	
Quarry Bank Farm, Stewnor Park	2002/1030 & 2004/0778	N/A	Outline Full	No	Under Construction	1	1	N/A
Rear 14 Dane Avenue, Barrow	2015/0257	23-Jun-18	Outline	No	Not Started	1	1	
Sinkfall Farm, Rakesmoor Lane, Barrow	2009/2162	N/A	Full	No	Under Construction	2	2	
St Lukes Church, Roose Rd,Barrow	2016/0359 2017/0083 (approved after HLS Base date)	12-Jul-19	Full	No	Under Construction	18	18	Unavailable
Victoria Park Hotel, Victoria Rd, Barrow	2015/0679	N/A	Full	No	Under Construction	16	16	Yes

Sites Under 0.1 Hectares

Site Name	Planning App. Ref.	Date of Expiry of Consent : N/A if under construction	Application Type	Allocated in the Dev Plan	Site progress	No. dwellings left to complete at end 16/17	No. dwellings likely to be completed in 5 year period	Larger Sites Delivery Timetable received from developer/ landowner
Barrow Amalgamated Engineers Club, Abbey Rd, Barrow	2015/0831 & 2015/0832	N/A	Full	No	Under Construction	13	13	N/A
Units 1 & 6, Elliscale Farm, Askam Road, Dalton	2009/1473 & 2007/1428	N/A	Full	No	Under Construction	2	2	
100 Greengate Street, Barrow	2015/0601	N/A	Full	No	Under Construction	3	3	
11 Tudor Square, Dalton	2013/0322	N/A	Full	No	Under Construction	1	1	
113 Ramsden Street, Barrow	2011/0687	N/A	Full	No	Under Construction	1	1	
1-3 Silverdale St, Barrow	2016/0447	N/A	Full	No	Under Construction	8	8	N/A
1-3 Station Terrace, Dalton	2015/0376	N/A	Full	No	Under Construction	-1	-1	
166 Rawlinson Street, Barrow	2015/0040	N/A	Full	No	Under Construction	2	2	
187 Rawlinson Street, Barrow	2004/1003	N/A	Full	No	Under Construction	1	1	
197 Rawlinson Street, Barrow	2015/0578	25-Oct-18	Prior Approval	No	Not Started	1	1	

Site Name	Planning App. Ref.	Date of Expiry of Consent : N/A if under construction	Application Type	Allocated in the Dev Plan	Site progress	No. dwellings left to complete at end 16/17	No. dwellings likely to be completed in 5 year period	Larger Sites Delivery Timetable received from developer/ landowner
2 Lighthouse Cottages, South End, Barrow	2014/0280	N/A	Full	No	Under Construction	1	1	
2 Redoak Avenue, Barrow	2014/0446	N/A	Full	No	Under Construction	2	2	
2/4 Hartington Street, Barrow	2011/0559	N/A	Full	No	Under Construction	-1	-1	-
289 Rawlinson Street, Barrow	2015/0721	N/A	Prior App	No	Under Construction	1	1	
2A & 2 Market Street, Dalton	2013/0411	N/A	Full	No	Under Construction	-1	-1	
3 Cheltenham St	2016/0090	N/A	Full	No	Under Construction	1	1	
3 Prospect Road, Barrow	2014/0161	N/A	CLOPUD	No	Under Construction	1	1	N/A
31 Station Rd	2016/0630	N/A	Full	No	Under construction	1	1	
32/34 Furness Park Rd, Barrow	2010/1277	N/A	Full	No	Under Construction	2	2	
36-38 Hartington Street, Barrow	2015/0359	16-Sep-18	Full	No	Not Started	1	1	
3-7 Buccleuch St, Barrow	2016/0226	12-May-19	Full	No	Not started	6	6	

Site Name	Planning App. Ref.	Date of Expiry of Consent : N/A if under construction	Application Type	Allocated in the Dev Plan	Site progress	No. dwellings left to complete at end 16/17	No. dwellings likely to be completed in 5 year period	Larger Sites Delivery Timetable received from developer/ landowner
40 Anchor Road, Barrow	2013/0393	N/A	Full	No	Under Construction	1	1	
42 Salthouse Road, Barrow	2007/1302	N/A	Full	No	Under Construction	1	1	
46 Storey Square, Barrow	2015/0681	20-Dec-18	Full	No	Not Started	1	1	
48 North Row, Barrow	2011/0297	N/A	Full	No	Under Construction	1	1	
49 King Alfred Street/3 Mikasa Street, Barrow	2008/0049	N/A	Full	No	Under Construction	-1	-1	
49 Market Street, Dalton	2009/0339	N/A	Full	No	Under Construction	1	1	N/A
51 Thorncliffe Rd, Barrow	2016/0669	30-Nov-19	Full	No	Not started	1	1	
52 Rawlinson Street, Barrow	2013/0336	N/A	Full	No	Under Construction	1	1	
54 Rawlinson Street, Barrow	2013/0337	N/A	Full	No	Under Construction	1	1	
56-58 Rawlinson Street, Barrow	2014/0658	N/A	Full	No	Under Construction	1	1	
52 School St, Barrow	2013/0810	N/A	Full	No	Under Construction	4	4	

Site Name	Planning App. Ref.	Date of Expiry of Consent : N/A if under construction	Application Type	Allocated in the Dev Plan	Site progress	No. dwellings left to complete at end 16/17	No. dwellings likely to be completed in 5 year period	Larger Sites Delivery Timetable received from developer/ landowner
59 Hindpool Rd, Barrow	2016/0339	01-Jul-19	Full	No	Not started	1	1	
6 Miller Close, Barrow	2015/0652	18-Nov-18	Full	No	Not Started	1	1	
66 Warwick Street, Barrow	2012/0392	N/A	Full	No	Under Construction	2	2	
68 Abbey Rd,Barrow	2016/0509	10-Oct-19	Outline	No	Not started	8	8	
77 Duke St, Barrow	2016/0689		Prior Approval	No	Not started	1	1	
87 Duke Street	2014/0554 2013/0044 2011/0521	03-Oct-17 N/A N/A	Full	No	Not Started Under Construction Under Construction	3	3	N/A
89 Duke Street	2013/0332	N/A	Full	No	Under Construction	1	1	
99 Market Street	2007/1033	N/A	Full	No	Under Construction	1	1	
Albion Bros, Yarlwell	2004/0961	Various	Various	No	Under Construction	4	4	
Barn at North Stank Farm, Newton Cross Rd	2009/0042	N/A	Full	No	Under Construction	2	2	

Site Name	Planning App. Ref.	Date of Expiry of Consent : N/A if under construction	Application Type	Allocated in the Dev Plan	Site progress	No. dwellings left to complete at end 16/17	No. dwellings likely to be completed in 5 year period	Larger Sites Delivery Timetable received from developer/ landowner
Church House, Church St, Dalton	2008/0851	N/A	Full	No	Under Construction	1	1	
Crystal Palace, Dalkeith St ¹⁷	2015/0729	N/A	Full	No	Under Construction	3	3	
Fire Station, Broughton Rd, Dalton	2016/0696	01-Feb-20	Full	No	Not started	3	3	
Former Coop Building, Chapel Street, Dalton	2016/0427	30-Nov-19	Full	No	Not started	4	4	
Former Riflemans Arms, 54 Salthouse Rd, Barrow	2013/0117	N/A	Full	No	Under Construction	2	2	
Former St Perrans Church, North Row, Barrow	2015/0250	N/A	Full	No	Under Construction	2	2	N/A
Furness Tavern, Duke St, Askam	2015/0164	27-Apr-18	Full	No	Not Started	4	4	
Holbeck Community. Centre, Holbeck Park Ave, Barrow	2015/0457	N/A	Full	No	Under Construction	1	1	

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¹⁷ This permission was omitted from the previous HLS 2016 in error. The permission is for a 13 bed HMO however this consists of 3 separate dwellings in accordance with the glossary definition. See approved plans for further details.

Site Name	Planning App. Ref.	Date of Expiry of Consent : N/A if under construction	Application Type	Allocated in the Dev Plan	Site progress	No. dwellings left to complete at end 16/17	No. dwellings likely to be completed in 5 year period	Larger Sites Delivery Timetable received from developer/ landowner
Ireleth Garage, Ireleth Rd, Ireleth	2013/0321	N/A	Full	No	Under Construction	1	1	
Land adj to 7 Prospect Ave, Barrow	2008/0335	N/A	Full	No	Under Construction	1	1	
Land adj to Belmont, Duddon Rd, Askam	2014/0272	13-Aug-17	Full	No	Not Started	1	1	
Land adjoining Cumbria View, Marsh St, Barrow	2008/0789	N/A	Full	No	Under Construction	1	1	
Land at 95 Teasdale Road, Barrow	2014/0275	24-Jun-17	Outline	No	Not Started	1	1	
Land at Chatsworth Street, Barrow	2015/0718	01-Dec-18	Outline	No	Not Started	3	3	
Land at Gillswood, Park Rd	2016/0595	08-Nov-19	Full	No	Not Started	1	1	
Land at John Street, Askam	2015/0561	N/A	Full	No	Under construction	1	1	
Land at Station Approach, Dalton	2013/0550	N/A	Outline	No	Under Construction	1	1	N/A
Land between No. 53 and No. 59 North Row, Barrow	2015/0018	N/A	Full	No	Under Construction	1	1	
Land to the rear of Chetwynde Hotel, Abbey Rd, Barrow	2010/0459	N/A	Full	No	Under Construction	1	1	

Site Name	Planning App. Ref.	Date of Expiry of Consent : N/A if under construction	Application Type	Allocated in the Dev Plan	Site progress	No. dwellings left to complete at end 16/17	No. dwellings likely to be completed in 5 year period	Larger Sites Delivery Timetable received from developer/ landowner
Latona Street, corner of Promenade, Barrow	2015/0022	N/A	Full	No	Under Construction	2	2	
Lesser Kings Hall, Hartington St, Barrow	2016/0775	24-Jan-20	Full	No	Not started	4	4	
Lynter Court, Barrow	2015/0122	N/A	Full	No	Under Construction	1	1	
Old Chapel, between 14-16 Marsh St, Barrow	2005/0722	N/A	Full	No	Under Construction	8	8	
Park Farm, Dalton	2015/0448	01-Sep-18	Prior Approval	No	Not Started	2	2	
Plot 4 Station Approach, Dalton	2013/0103	N/A	Outline	No	Under Construction	1	1	
Railway Hotel, Station Terrace, Dalton	2011/0291	N/A	Full	No	Under Construction	4	4	
Railway Inn, London Rd, Lindal	2013/0818	N/A	Full	No	Under Construction	1	1	
Rear of 54 Flass Lane, St Marys Rd, Barrow	2009/0175	N/A	Full	No	Under Construction	1	1	N/A
Sandgate Hotel	2012/0355	N/A	Full	No	Under Construction	2	2	
Sandylands Farm, Harrel Lane, Barrow	2006/1500	N/A	Full	No	Under Construction	2	2	
Scale Bank Farm, Tarn Flatt	2014/0834	N/A	Full	No	Under Construction	1	1	

Site Name	Planning App. Ref.	Date of Expiry of Consent : N/A if under construction	Application Type	Allocated in the Dev Plan	Site progress	No. dwellings left to complete at end 16/17	likely to be	Larger Sites Delivery Timetable received from developer/ landowner
Sowerby Hall Farm, Bank Lane,Barrow	2007/1005	N/A	Full	No	Under Construction	4	4	
The Vulcan, Duke St, Askam	2010/1577	N/A	Full Outline	No	Under Construction	4	4	
Totals						630	528	

Appendix B

Risk Assessment

The NPPG states that a risk assessment should be carried out to determine whether sites will come forward as anticipated.

The Housing Land Statement identifies deliverable sites which could contribute to the 5 year housing land supply on the basis of current information. Developable sites i.e. those which could contribute to the supply in years 6 plus are identified in the Council's emerging Local Plan. There is no guarantee that sites will come forward as anticipated.

- Issues may arise at planning application stage which may mean planning permission is not granted, for example whilst development is deemed suitable in principle, the development may be deemed unacceptable in terms of specific issues such as design or impact upon neighbouring residents.
- Whilst a site may benefit from planning permission, and is therefore classed as
 deliverable, the landowner may have sought this speculatively in order to
 increase the value of the land. There may not be developer interest in the
 site.
- In most cases, projections of future completion rates are based upon averages of past trends which may or may not continue.
- Where phasing information has been provided this may be prone to change
 if the developers' capacity to build changes or if market demand changes.
- Not all planning permissions are implemented. We have not reduced the supply to take this into account and have included all sites with planning permission unless evidence suggested that the permission is likely to lapse or the development is unviable (for example, if the permission was due to lapse over the following months and planning conditions are still outstanding or if a different use is being progressed). This approach is in line with recent caselaw.
- In the absence of a planning application, development brief or preapplication discussions, indicative yields are taken from the emerging Local Plan. This may over/under estimate a sites potential yield as planning permission may be sought for a different number of houses.
- A reduction has been made to the windfall allowance on sites under 0.1
 hectares to take into account development on garden sites, in accordance
 with the NPPF. Development may still however occur on such sites as the
 policy in the current Local Plan does not prevent them altogether providing
 the development is appropriate. The supply therefore may be
 underestimated in light of this.

Glossary

Achievable: A site is considered achievable for development where there is a reasonable prospect that housing will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period (NPPG paragraph 021).

Affordable Housing: Social/affordable, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

- Social/affordable housing is owned by local authorities and private Registered Providers (as defined in Section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.
- Affordable Rented housing is let by local authorities or private Registered Providers of social housing to households who are eligible for social/affordable housing. Affordable rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).
- Intermediate Housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the affordable housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing. Homes that do not meet the above definition of affordable housing, such as "low cost market" housing, may not be considered as affordable housing for planning.

(NPPF, Annex 2)

Available: A site is considered available for development when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips, tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the land owner has expressed an intention to sell. Because persons do not need to have an interest in the land to make planning applications, the existence of a planning permission does not necessarily mean that the site is

available. Where potential problems have been identified, then an assessment will need to be made as to how and when they can realistically be overcome. Consideration should also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions (NPPG paragraph 020).

Broad Location: These are areas where housing development is considered feasible but where specific sites cannot yet be identified. Examples of Broad Locations include:

Within and adjoining settlements-for example, areas where housing development is or could be encouraged, and small extensions to settlements; and

Outside settlements- for example, major urban extensions, growth points, growth areas, new free-standing settlements and eco-towns

Communal Population: The communal population (also known as the institutional population) includes all people not living in private households; such as medical establishments (for example hospital sheltered housing, and in care homes), educational establishments (schools and university), military, religious and detention facilities, and those living in temporary accommodation.

DCLG: Department for Communities & Local Government

Deliverable: To be considered deliverable, sites 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 and in particular that development of the site is viable. 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 (NPPF, footnote 11).

Developable: To be considered developable, sites should be 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 11).

Dwelling: A dwellings is a self contained unit of accommodation. Self-containment is where all the rooms (including kitchen, bathroom and toilet) in a household's accommodation are behind a single door which only that household can use. Non-self contained household spaces at the same address should be contained together as a single dwelling. Therefore a dwelling can consist of one self-contained household space or two or more non-self-contained household spaces at the same address. (ONS - https://www.gov.uk/guidance/definitions-of-general-housing-terms)

Economically Active: People who are either in employment or unemployed

Economically Inactive: People who are neither in employment nor unemployed. This group includes, for example, all those who were looking after a home or retired.

Economically inactive – wanting a job: People not in employment who want a job but are not classed as unemployed because they have either not sought work in the last four weeks or are not available to start work.

Economically inactive – not wanting a job: People who are neither in employment and who do not want a job.

Employee Jobs: The number of jobs held by employees. Employee jobs excludes self-employed, government-supported trainees and HM Forces, so this count will be smaller than the total jobs figure shown in the Jobs density table. The information comes from the Business Register and Employment Survey (BRES) – an employer survey conducted in September of each year. The BRES records a job at the location of an employee's workplace (rather than at the location of the businesses main office) (Nomis)

FTE (full time equivalent): An FTE is the hours worked by one employee on a full time basis. The concept is used to convert the hours worked by several part time employees into the hours worked by a full-time employee.

Household: One person living alone; or a group of people (not necessarily related) living at the same address who share cooking facilities and share a living room or sitting room or dining area. (2011 Census)

Household Population: The household population is the total population after the communal population has been removed.

Housing market Area: Geographical areas defined by objectively assessed household demand and preferences for housing. They reflect the key functional linkages between places where people live and work (SHMA 2014)

NPPF: National Planning Policy Framework

NPPG: National Planning Practice Guidance

Non-developable: Where it is unknown when a site could be developed, for example, because one of the constraints to development is severe and it is not known when it might be overcome

Objectively Assessed Need: The housing that households are willing and able to buy or rent, either from their own resources or with assistance from the state

PAS: Planning Advisory Service

POPGROUP: A family of software developed to forecast population, households and the labour force.

Suitable: Assessing the suitability of sites or broad locations for development should be guided by:

- the development plan, emerging plan policy and national policy;
- market and industry requirements in that housing market or functional economic market area.

When assessing the sites against the adopted development plan, plan makers will need to take account of how up to date the plan policies are and consider the appropriateness of identified constraints on sites/broad location and whether such constraints may be overcome.

Sites in existing development plans or with planning permission will generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability. This will include a re-appraisal of the suitability of previously allocated land and the potential to designate allocated land for different or a wider range of uses. This should be informed by a range of factors including the suitability of the land for different uses and by market signals, which will be useful in identifying the most appropriate use.

In addition to the above considerations, the following factors should be considered to assess a site's suitability for development now or in the future:

- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;
- appropriateness and likely market attractiveness for the type of development proposed;
- contribution to regeneration priority areas;
- environmental/amenity impacts experienced by would be occupiers and neighbouring areas.

(NPPG Paragraph 019)

Starter Homes: A starter home is expected to be well designed and suitable for young first time buyers... Local planning authorities and developers should work together to determine what size and type of starter home is most appropriate for a particular starter home exemption site reflecting their knowledge of local housing markets and sites. A starter home is not expected to be priced after the discount significantly more than the average price paid by a first time buyer. This would mean the discounted price should be no more than £250,000 outside London and £450,000 in London.

Windfall Sites: These are sites which are not allocated for housing and are not identified through the Local Plan process. Evidence suggests will continue to come forward in the future based on past trends. Development on smaller windfall sites tends to arise from the conversion of buildings from other uses and the sub-division of larger properties.

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Working together to support sustainable development within the Borough of Barrow-in-Furness

