### Document Control Sheet

**Project Name:** Liverpool City Council Strategic Housing Land Availability Assessment 2017  
**Report Title:** Volume A: Main Report  
**Project Ref:** 42392  
**Date:** June 2018

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For and on behalf of Peter Brett Associates LLP

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EXECUTIVE SUMMARY

Peter Brett Associates LLP was commissioned in October 2017 by Liverpool City Council (‘LCC’) to undertake a Strategic Housing Land Availability Assessment (‘SHLAA’).

The Council is currently preparing a new Local Plan and requires a SHLAA to assess the supply of land for housing development in the City to meet housing requirements over at least a 15-year period, including the need to demonstrate at least a first five-year supply of specific, deliverable housing sites (including the application of an appropriate NPPF buffer of either 5 or 20 per cent).

The SHLAA is a technical study which forms part of the evidence base supporting the emerging Local Plan and does not represent a statement of Council policy nor does it have a bearing on the determination of planning applications. It should also be emphasised that the purpose of the SHLAA is not to allocate sites, which is undertaken through the Local Plan process.

This Main Report (Volume A) is supported by a methodology, and tables of findings. Volume B contains various Appendices, including detailed schedules showing how sites considered through the SHLAA perform against the identified assessment criteria.

Context

The National Planning Policy Framework (‘NPPF’), published in March 2012, requires local authorities to boost significantly the supply of housing through a range of measures. Those measures include identifying a supply of specific, deliverable and developable sites over a 15-year plan period. This SHLAA is an important part of the evidence supporting that requirement and includes establishing realistic assumptions about the availability, suitability and economic viability of land to meet the identified need for housing over the plan period.

Historically, the City has achieved the bulk of its housing development on previously developed land and the new Local Plan continues this strategic approach by seeking to meet the City’s identified housing need for the plan period on previously developed land.

The base date of the SHLAA 2017 is April 2017.

Approach

LCC’s SHLAA database contains a total of 1,073 sites, comprising sites known to the Council (identified through various sources including ‘call for site’ submissions, regeneration strategies and programmes, and lapsed or withdrawn planning applications), divided between ‘committed sites’ (sites with extant planning permission), and non-planning permission sites requiring appraisal.

Of the 1,073 sites, as at April 2017, there were 379 committed sites with planning permission, with a consented capacity totalling 26,688 dwellings.
In accordance with the NPPF and the Planning Practice Guidance (‘PPG’), LCC and PBA have assessed whether the identified SHLAA sites are ‘deliverable’ (i.e. available now, suitable and achievable), ‘developable’, or ‘not currently developable’ (due to a number of identified constraints restricting the ability of the site to be brought forward for housing development over the plan period).

For completeness, we have tested both 5 per cent and 20 per cent NPPF ‘buffer’ scenarios for the first five-year period, which seeks to bring forward additional supply from later in the plan period to ensure choice and competition in the market for land. A 5 per cent buffer reflects the minimum NPPF buffer that is required to be applied whereas a 20 per cent buffer is applied to authorities where there has been a record of persistent under delivery of housing.

**Summary of Findings**

**Committed Supply**

Based on Council data as at April 2017, the committed supply predicted to come forward within the 15-year plan period is 21,177 dwellings. From the committed supply, 16,542 dwellings are predicted to come forward in the first five years (between April 2017 and March 2022 as shown in Appendix 2).

Having regard to this committed supply and taking into account non-implementation, demolition, and windfall allowances, the Council is able to demonstrate a deliverable five-year supply against both 5 per cent and 20 per cent NPPF buffer scenarios, as shown in the table below. This is based on the submitted Local Plan requirement of 1,739 net additional dwellings per annum.

The level of deliverable housing supply is dependent on how past housing delivery is taken into account. Three scenarios within the first five-year period have been considered and these are a ‘zero-based approach’ (where past over delivery of housing that has been provided over and above the relevant housing requirement is not taken into account), a surplus position starting from 2012 (217 dwellings provided in excess of the requirement), and a surplus position taken from 2013 (1,060 dwellings provided in excess of the requirement). These scenarios are detailed further in the table below.
Liverpool’s 5-year housing supply position

<table>
<thead>
<tr>
<th>Component</th>
<th>Zero based approach</th>
<th>2012 Surplus (+217)</th>
<th>2013 Surplus (+1,060)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Dwellings</td>
<td>Dwellings</td>
<td>Dwellings</td>
</tr>
<tr>
<td>A1</td>
<td>5-year Housing Requirement (1739 x 5)</td>
<td>8,695</td>
<td>-</td>
</tr>
<tr>
<td>A2</td>
<td>5-year Housing Requirement (1739 x 5), less surplus</td>
<td>n/a</td>
<td>8,478</td>
</tr>
<tr>
<td>B</td>
<td>5-year Housing Requirement plus 5% NPPF buffer</td>
<td>9,130</td>
<td>8,902</td>
</tr>
<tr>
<td>C</td>
<td>5-year Housing Requirement plus 20% NPPF buffer</td>
<td>10,434</td>
<td>10,174</td>
</tr>
<tr>
<td>D</td>
<td>Committed supply at April 2017 expected to come forward in the 5-year period (April 2017 and April 2022 - see Appendix 2)</td>
<td>16,542</td>
<td>16,542</td>
</tr>
<tr>
<td>E</td>
<td>Windfall Allowance (130 dwellings per annum x 5)</td>
<td>650</td>
<td>650</td>
</tr>
<tr>
<td>F</td>
<td>Non-Implementation allowance (10% of D)</td>
<td>1,654</td>
<td>1,654</td>
</tr>
<tr>
<td>G</td>
<td>Demolition allowance (10 dwellings per annum x 5)</td>
<td>50</td>
<td>50</td>
</tr>
<tr>
<td>H</td>
<td>Total supply as at April 2017 (D+E)-(F+G)</td>
<td>15,488</td>
<td>15,488</td>
</tr>
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</table>

Deliverable 5-year supply scenarios

<table>
<thead>
<tr>
<th>I1</th>
<th>5-year supply with 5% NPPF buffer (H/(B/5))</th>
<th>Years</th>
<th>Years</th>
<th>Years</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>8.48</td>
<td>8.48</td>
<td>8.48</td>
</tr>
<tr>
<td>I2</td>
<td>5-year supply with 5% NPPF buffer - less surplus (H/(B/5))</td>
<td>8.48</td>
<td>8.70</td>
<td>9.66</td>
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<tr>
<td>I3</td>
<td>5-year supply with 20% NPPF buffer (H/(C/5))</td>
<td>7.42</td>
<td>7.42</td>
<td>7.42</td>
</tr>
<tr>
<td>I4</td>
<td>5-year supply with 20% NPPF buffer - less surplus (H/(C/5))</td>
<td>7.42</td>
<td>7.61</td>
<td>8.45</td>
</tr>
</tbody>
</table>

SHLAA Sites without Planning Permission

The 694 assessed housing sites which did not have planning permission at April 2017, have been placed into three category bands:

- Sites which perform well against the suitability, availability and achievability assessments, and are therefore affected by the fewest constraints, are considered to be ‘deliverable’ and were therefore placed into **Category 1** (potentially can come forward within 0-5 years).

- Sites with a limited level of constraints, such that they are likely to be available for delivery after the first five years, were placed into **Category 2** (potentially can come forward in 6-10 years). These ‘developable’ sites may be suitable for development, depending on their individual circumstances and on specific measures being proposed to overcome their constraints within a 6 to 10-year time horizon.

- Sites allocated to **Category 3** (potentially can come forward in 11-15 years) are classified as being ‘not currently developable’ and have more significant constraints. For these sites to be considered appropriate for development it would have to be clearly demonstrated that the significant constraints affecting these sites can be mitigated or overcome to make them deliverable or developable.
The 694 sites without planning permission could potentially yield a total of 19,163 dwellings. Of this theoretical dwelling yield:

- 780 dwellings from 24 sites could be expected to come forward for development in years 1 to 5;
- 6,601 dwellings from 389 sites could be expected to come forward for development in years 6 to 10; and
- 11,782 dwellings from 281 sites could be expected to come forward for development in years 11 to 15.

Outstanding planning commitments together with the inclusion of a windfall allowance and a demolition allowance (after a non-implementation rate has been applied) is sufficient to meet the target for the first five years of 9,130 dwellings (with a 5 per cent buffer applied to the first five-year period) and 10,434 dwellings (with a 20 per cent buffer applied to the first five-year period). This can be done without the need to bring forward any SHLAA sites without planning permission, owing to the significant level of existing commitments. However, this does not preclude them coming forward over the same period as there is an indicative supply of 790 dwellings from Category 1 sites.

**Ten- and 15-Year Assessment Period**

The assessment’s cumulative approach brings forward the first 5-year housing supply position (with 5 per cent and 20 per cent buffers) into the assessment of the ten and 15-year periods, based on the April 2017 base date.

The 10-year target of 17,607 dwellings (under the 5 per cent ‘buffer’ scenario applied to the first five-year period) can also be fully met based on outstanding planning commitments alone, taking into account the application of the 10 per cent non-implementation allowance. However, the 10-year target of 18,260 dwellings (under the 20 per cent ‘buffer’ scenario applied to the first five-year period) cannot be met fully by existing commitments alone and requires the inclusion of the windfall allowance. No Category 1, 2 or 3 sites are required to come forward to meet the 10-year target.

Liverpool’s 15-year dwelling target is 26,085 dwellings under both a 5 per cent and 20 per cent buffer (applied to the first five-year period). The 15-year requirement can be met if all Category 1 sites and a significant proportion of Category 2 sites are brought forward. No Category 3 sites are required under either of the 15-year scenarios.

Given that the maximum 15-year dwelling requirement for Liverpool is 26,085 dwellings (under both the 5 per cent and 20 per cent NPPF buffer scenarios in the first 5-year period), the findings outlined above suggest that the potential yield from the sites identified in the SHLAA, is more than sufficient to accommodate that requirement.

It is likely, however, to be necessary for the City Council to make choices over sites which are not currently suitable due to conflict with local policy designations. For example, a significant proportion of Category 2 sites comprise formal or informal open space, which is an important constraint that may be difficult or undesirable to
overcome in many cases. This is ultimately a policy choice to be considered by LCC and is outside of the remit of the SHLAA.

However, as no Category 3 sites are theoretically required, under any scenario, this provides a degree of ‘headroom’ for choices over which sites can be brought forward. It is also highly likely that additional SHLAA sites will be identified as part of future reviews, which will bolster the number of SHLAA sites under consideration.

Our site categorisation does not take account of all the policy considerations that are relevant in selecting sites for allocation or for the granting of planning permission, which are likely to include the broad sustainability of the development, impact on biodiversity, and strategic transport and other infrastructure capacity issues. Thus, we have not undertaken any analysis to consider whether the sites we have assessed are in the right place to meet strategic policy objectives. These are choices to be made through the plan-making process.
1 INTRODUCTION

Purpose of the Study

1.1 In October 2017, Peter Brett Associates LLP (‘PBA’) was commissioned by Liverpool City Council (‘LCC’), to undertake a Strategic Housing Land Availability Assessment (‘SHLAA’).

1.2 LCC is at an advanced stage of preparation of a new City-wide development plan, known as the ‘Liverpool Local Plan 2013-2033’, with consultation on a ‘Pre-submission Draft’ undertaken between January and March 2018 and subsequent submission to the Secretary of State in May 2018. The emerging Local Plan seeks to provide a framework for delivering development until 2033. Upon adoption, the Liverpool Local Plan will replace the saved policies of the Liverpool Unitary Development Plan (adopted November 2002).

1.3 As part of the production of the new Local Plan, LCC is updating its evidence base. This SHLAA forms a key part of the evidence base for the new Local Plan, which will need to ensure that sufficient housing and employment land is available to meet the City Council’s identified needs. LCC has undertaken the assessment of the suitability and availability of the existing sites previously considered in the Liverpool SHLAA 2016 (undertaken by officers in-house), whilst PBA has been commissioned to provide updated achievability scores for all sites as well as the assessment of the suitability, availability and achievability of an additional 50 sites, not previously identified and assessed in the 2016 assessment.

1.4 The SHLAA has been undertaken in full compliance with the current (‘NPPF’) of March 2012 and the Planning Practice Guidance (‘PPG’) of March 2014 – in particular the section on the assessment of land availability – and we have also been cognisant of the emerging NPPF.

1.5 The initial database included a total 1,074 sites, however, a single site has been removed from the assessment due to it being fully within the Merseyside Green Belt. The SHLAA therefore considers a total of 1,073 sites, of which 379 have an extant planning permission and the remainder (694) are known to the Council as sites for potential residential development (many of which having been identified via previous ‘call for sites’ consultations). The assessment assumes that the sites with planning permission are deliverable subject to the application of a non-implementation allowance, and therefore focusses on the consideration of the 694 sites without planning permission (following the elimination of the single site which falls entirely within the Merseyside Green Belt).

1.6 In accordance with the NPPF and the PPG, LCC and PBA have assessed whether each identified site should be placed within Category 1; that is, ‘deliverable’ (i.e. available now, suitable and achievable), Category 2 (‘developable’), or Category 3

---

1 LCC site ref. 5610 - Victoria Falls Road, land (Former Cross Farm School), Belle Vale
1.7 At the outset, it is important to emphasise that the SHLAA is a technical study which forms part of the evidence base supporting the emerging Local Plan. The SHLAA therefore does not represent a statement of Council policy and it does not have any bearing on the determination of planning applications. It should also be emphasised that the purpose of the SHLAA is not to allocate sites, which will be considered through the Local Plan process.

**Structure of Our Report**

1.8 The remainder of this SHLAA report is structured as follows:

- Section 2 contains a review of the national and local planning policy contexts;
- Section 3 describes the methodology that we employed for the study;
- Section 4 provides the findings from the study and assesses whether there are sufficient deliverable and developable sites to achieve the proposed LCC dwelling targets;
- Section 5 outlines the headline findings of the assessment; and
- Section 6 provides our summary and conclusions.

1.9 The main SHLAA report is accompanied by a number of appendices that are contained in the separately bound Volume B. The appendices comprise a list of all sites that have been assessed in the SHLAA including their categorisation, a copy of the site assessment criteria note, a housing market commentary note and results of both the high-level development appraisals and more detailed development appraisals.
2 NATIONAL AND LOCAL PLANNING POLICY

2.1 In this section we provide an overview in this section of relevant national guidance and local planning policy as well as key supporting evidence, to provide the context for the 2017 SHLAA assessment.

2.2 The 2017 SHLAA assessment is taking place during a period when both national and local planning policy are evolving. A draft revised National Planning Policy Framework was published in March 2018 and the Council has submitted its Local Plan in May 2018, which we reflect below.

National Planning Policy and Guidance

2.3 This SHLAA has a base date of April 2017 and was substantially advanced prior to the publication of the draft revised NPPF in March 2018. This sub-section therefore summarises the relevant matters outlined in the 2012 NPPF to which this report has had regard in its preparation, before outlining pertinent changes from the 2018 replacement.

Requirement to Undertake a SHLAA

2.4 Paragraph 159 of the 2012 NPPF sets out the requirement for local planning authorities (‘LPAs’) to have a clear understanding of housing needs in their area. In order to achieve this, the 2012 NPPF advises that LPAs should prepare a Strategic Housing Land Availability Assessment to: ‘establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period’.

Achieving Sustainable Development

2.5 The very first sentence of the 2012 NPPF, in the Ministerial Foreword, makes clear that the purpose of planning is to help achieve sustainable development. The Ministerial Foreword then states that ‘sustainable development is about positive growth’ and that the planning system is about making this happen.

2.6 Paragraph 7 of the NPPF states that there are three dimensions to sustainable development: economic, social and environmental. We do not consider it worthwhile repeating in full what the NPPF says in relation to each ‘dimension’, but we note that under the economic dimension, the NPPF states that in order to build a strong, responsive and competitive economy, it is important to ensure that: ‘sufficient land of the right type is available in the right places and at the right time to support growth and innovation’.

2.7 Paragraph 17 of the NPPF sets out 12 core planning principles. Again, we do not repeat those principles in detail here but we note the third principle, which implores the planning system to: ‘proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs’. Furthermore, the third principle goes on to state that ‘every effort should be made objectively to identify and then meet the
housing, business and other development needs of an area, and respond positively to wider opportunities for growth’.

2.8 We also highlight the eighth principle of seeking to ‘encourage’ the effective use of land through the re-development of previously developed sites. This is particularly relevant to LCC as its administrative area is predominantly built-up, comprising a range of previously developed sites.

Delivering a Wide Choice of High Quality Homes

2.9 Paragraph 47 of the NPPF advises that, in order to significantly boost the supply of housing, LPAs should ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing. The same paragraph requires councils to identify a supply of specific deliverable sites sufficient to provide five years’ worth of housing, but it goes further than the precursor PPS3 which it replaced, stating that LPAs should provide sufficient land for an additional 5 per cent ‘buffer’, brought forward from later in the plan period, or a 20 per cent buffer, also brought forward from later in the plan period, where there has been a persistent record of under-delivery.

2.10 Footnote 11 to paragraph 47 of the NPPF states: ‘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’.

2.11 Footnote 12 of paragraph 47 states: ‘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’.

2.12 Paragraph 48 of the NPPF permits the use of a windfall allowance in the five-year supply, if there is ‘compelling evidence’ that such sites have made a consistent contribution to the supply and where there is confidence that such sites will continue to provide a reliable source of supply.

2.13 Paragraph 49 of the 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’. Paragraph 14 of the NPPF advises that, where the development plan is absent, silent or relevant policies are out-of-date, planning permission should be granted for development proposals unless: ‘any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed in this Framework taken as a whole’ or where specified policies in the NPPF indicate that development should be restricted.

2.14 It is therefore imperative that any sites which are included in a council’s five-year land supply are genuinely deliverable. Failure to do so could result in a council facing pressure to release sites in an unplanned fashion.
2.15 We also wish to highlight paragraph 50 of the NPPF, which advocates a mix of high-quality housing that is capable of meeting the needs of different groups in the community. The same paragraph also advises LPAs to ensure an adequate supply of housing in terms of size, type, tenure and range.

Planning Practice Guidance

2.16 On 6 March 2014, the CLG launched the online PPG to provide additional guidance on a range of topics, including land availability assessments. The PPG advises that the assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period.

2.17 The PPG advises that an assessment of land availability is an important step in the preparation of Local Plans and reiterates that the NPPF identifies the advantages of carrying out land assessments for housing and economic development as part of the same exercise. The PPG states that the assessment should:

- identify sites and broad locations with potential for development;
- assess their development potential; and
- assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

2.18 The PPG is clear in advising that the SHLAA is an important evidence source to inform plan making, but does not in itself determine whether a site should be allocated for development. The role of the SHLAA is to provide information on the range of sites which are available to meet needs, but it is for the development plan preparation process to determine which of those sites are the most suitable to meet those needs.

2.19 The PPG sets out a five-stage flow chart describing a methodology as to how a SHLAA should be undertaken at ‘Paragraph: 006 Reference ID: 3-006-20140306’ (reproduced below as Figure 2.1).

2.20 Stage 1 advises that the area selected for the assessment should be the housing market area and the functional economic market area, which can be the local planning authority area. The assessment is required to assess a range of different site sizes from small-scale sites to opportunities for large-scale developments such as village and town extensions and new settlements where appropriate. The assessment should consider as many sites and broad locations as possible above a size threshold that the PPG suggests should be sites capable of delivering five or more dwellings or economic development on sites of 0.25ha (or 500m² of floor space) and above, and at this stage should not be constrained by the need for development. The output of this stage is an initial assessment of whether sites are suitable for development.

2.21 Stage 2 involves an estimation of the development potential of each identified site, which should be guided by the existing or emerging plan policy including locally determined policies on density. The assessment should assess the suitability,
availability and achievability of sites, and consider whether sites are deliverable within the plan period.

2.22 Stage 3 states that a windfall allowance may be justified in determining housing potential (it does not apply to employment uses) if a local planning authority has compelling evidence as set out in paragraph 48 of the NPPF. LPAs have the ability to identify broad locations in years 6-15, which could include a windfall allowance based on a geographical area.

2.23 Stage 4 requires that, once sites and broad locations have been assessed, the development potential of all sites should be collated to produce an indicative trajectory, which should set out how much housing and economic development can be provided, and at what point in the future. An overall risk assessment should be made as to whether sites will come forward as anticipated. The trajectory may be an iterative process requiring recalibration of the assumptions in the assessment.

2.24 Stage 5 involves the collation of the final evidence base, which involves an assessment of each site or broad location, in terms of its suitability for development, availability and achievability including whether the site/broad location is viable, in order to determine whether a site is realistically expected to be developed and when. Assessing the suitability, availability and achievability will provide the information as to whether a site can be considered deliverable, developable or not currently developable for housing and employment uses.
Figure 2.1 PPG Assessment 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
- No
- Review assessment and prepare draft trajectory
- Enough sites / broad locations?
- Assessment of development need for housing and economic development uses

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

Source: Planning Practice Guidance
Revised Draft National Planning Policy and Guidance

2.25 In March 2018, the Government published the revised draft NPPF, and updates to the associated PPG, for public consultation until 10 May 2018.

2.26 The thrust of the revised NPPF is largely similar to the March 2012 version, whilst the guidance within the revised PPG continues to reiterate the advice contained within the current guidance. Significant changes include a Housing Delivery Test and associated Action Plan, if required, to address shortfalls in delivery where less than 85 per cent of the housing requirement is met.

2.27 The revised NPPF also introduces an additional 10 per cent buffer where the local planning authority seeks to demonstrate a ‘five-year supply of deliverable sites through an annual position statement or recently adopted local plan’.

2.28 Additionally, the revised NPPF replaces the previous approach of seeking to identify and meet the objectively assessed housing needs for the area, with a ‘local housing need assessment’ based on the application of a ‘standard method’ or alternative approach where justified.

2.29 Both the revised NPPF and PPG documents continue to require planning authorities to have a clear understanding of the housing land available in their area through the preparation of a SHLAA.

Extant and Emerging Local Plan Policy

Saved Policies of the Liverpool Unitary Development Plan (November 2002)

2.30 The Liverpool Unitary Development Plan (‘UDP’) was adopted in November 2002, all but four policies of which were ‘saved’ in 2007 and a further six in relation to waste matters were superseded by other policies.

2.31 The UDP is not up to date with respect to housing and employment land supply and allocations, having an original plan period of 1986-2001. We briefly highlight key housing policies for the purposes of completeness, though it should be noted that their weight will be limited to some extent due to their age and consistency with national planning policy, as directed by the NPPF:

- Policy GEN4 and H1 – Make provision for 23,100 net additional dwellings between 1986 to 2001 (equating to 1,540 dwellings per annum).
- Policy H2 – LCC will adopt an area regeneration framework approach to estate renewal as part of Housing Renewal Areas.

The Liverpool Local Plan 2013-2033 Pre-Submission Draft (January 2018)

2.32 LCC is preparing a new Local Plan to replace the UDP, which is at an advanced stage. Consultation on a pre-submission draft Liverpool Local Plan took place between January and March 2018. Following consideration of the representations
made during that consultation, LCC formally submitted the Local Plan to the Secretary of State for Examination in May 2018 and an Inspector has now been appointed to examine the plan.

2.33 The emerging Local Plan provides a long-term spatial vision, strategic priorities and policies for future development in the City over the next 15 years. Chapter 4 of the emerging Local Plan identifies nine ‘strategic priorities’ underpinning the approach being taken. Whilst a number of these priorities are cross-cutting (such as achieving sustainable development and strengthening the City’s economic performance), the priority specific to housing (‘Create Residential Neighbourhoods That Meet Housing Needs’) seeks:

‘To achieve an overall level of housing growth consistent with Liverpool’s requirements and which contributes to social and economic regeneration, and improving the design quality and diversity of the City’s housing offer to support the creation of vibrant, mixed, healthy and sustainable communities including dwellings designed for people with physical and learning disabilities.’

2.34 Policy STP1 (‘Spatial priorities for the sustainable growth of Liverpool’) emphasises the clear interlinkages between housing and economic development focused around Liverpool City Centre, key employment areas, enterprise zones as well as around the City’s various district and local centres. Major growth projects which will impact on the need for additional housing include Liverpool John Lennon Airport, the Port of Liverpool and the Cruise Liner Terminal.

2.35 Policy STP1 goes on to state that the provision of new homes will be supported on previously developed sites in sustainable locations. Thus, meeting the needs for new housing and ensuring sustainable and attractive residential neighbourhoods across the various housing sub-market areas within the City.

2.36 Policy H1 (‘Housing Requirement’) sets Liverpool’s housing requirement over the plan period (2013 and 2033) at a total of 34,780 net additional dwellings, equating to an average level of 1,739 dwellings per annum (‘dpa’). The requirement figure derives directly from the ‘objectively assessed need for housing’ identified in the January 2017 Strategic Housing and Employment Land Market Assessment (‘SHELMA’), undertaken on behalf of the Liverpool City Region authorities. We discuss the SHELMA in further detail below. No further details are provided on the apportioning of the requirement to the City Centre or other sub-areas of Liverpool, as specific allocations are identified within the draft Local Plan.

2.37 We note Table 7 of the draft Local Plan which identifies the sources of supply to meet the planned requirement. Some 8,015 dwellings have already been completed between April 2013 and March 2017, equating to an average of 2,004 net additional completions per annum, thus exceeding the draft Local Plan target of 1,739 dpa. The most significant element of supply is from existing commitments which account for 25,978 dwellings as at March 2017. The remaining contributions come from a windfall allowance of 130 dpa (a total of 1,950 dwellings over a 15-year period) and new housing allocations amounting to a total of 2,320 dwellings. After a 10 per cent
non-implementation figure is applied to both the commitments and the proposed allocations, this leads to a surplus figure or 'headroom' of 653 dwellings over the plan period.

2.38 Policy H2 ('Residential Development Site Allocations') lists the 23 proposed site allocations, which comprise the total indicated yield from that source of 2,320 dwellings.

2.39 Policy H3 ('Proposals for Residential Development') guides the types and mix of residential accommodation to be provided as well as proposing an affordable housing target of 20 per cent on sites of 10 dwellings or more, comprising 80 per cent social/affordable rent and 20 per cent intermediate housing. This is the first time that LCC has proposed an affordable housing target in an emerging Local Plan.

2.40 Policy H4 ('Older Persons Housing') supports various forms of supported, independent and retirement accommodation.

2.41 Policy H5 ('Student Housing Provision') focusses student accommodation within or close to the City Centre as well as requiring the accommodation to be flexible to changing market requirements.

2.42 Policy H7 ('Primary Residential Areas') provides in-principle support for new residential development within the 'Primary Residential Areas' defined on the draft policies map. The approach reflects Liverpool's urban nature and also supports the likelihood that a contribution from windfall development will be forthcoming over the plan period.

2.43 The evidence base supporting the production of the Liverpool Local Plan has been updated in response to the publication of more recent projections, specifically the Liverpool Strategic Housing Market Assessment ('SHMA') 2016 and the SHELMA 2017.

Local Plan Evidence and Monitoring

Liverpool Strategic Housing Market Assessment

2.44 The 2016 Liverpool SHMA specifically considers housing needs in Liverpool whilst recognising Liverpool's role within the wider Housing Market Area which includes the neighbouring authorities of Sefton, Wirral, Knowsley and West Lancashire.

2.45 The key findings of the SHMA are as follows:

- The 2012-based Household Projections published by the Government in February 2015 predict growth of 25,276 households between 2013 and 2033, equivalent to 1,264 dwellings per annum (including an allowance for a level of 'frictional vacancy' within a functioning housing market). These projections, re-based taking into account the mid-year estimates, suggest an increase of about 1,315 to 1,375 households per annum between 2013 and 2033.
- Oxford Economics' forecast growth in employment is 34,400 jobs (0.76 per cent, per annum) between 2013 and 2033, with Cambridge Econometrics' forecasts being more positive still, showing growth of 40,300 jobs (0.77 per cent, per
annum) over the same period. Taking an average of these two scenarios, this would equate to 1,472 homes per annum, representing the economic-led need for housing, which is 7 per cent higher than the trend-based demographic scenario.

- The SHMA evidence indicates that Liverpool is one of the more affordable cities in the country with median house prices around 40 per cent below the national average, equating to a lower quartile affordability ratio of 3.6.
- An objectively assessed affordable housing need of 343 additional households per year within the City.

2.46 However, the findings from the SHMA are effectively superseded by the more recent Liverpool City Region SHELMA, which we describe below.

**Liverpool City Region Strategic Housing & Employment Land Market Assessment (SHELMA)**

2.47 A SHELMA undertaken on behalf of the Liverpool City Region (‘LCR’) authorities was completed in 2017 to provide a consistent joint evidence base for housing and employment land needs across the LCR over the period to 2037. As the LCR authorities are at different stages of local plan production, the base-date which satisfied all authorities was 2012, thus the projection of housing need in the SHELMA covers a 25-year period from 2012 to 2037.

2.48 An assessment of the relevant Housing Market Area (‘HMA’) and Functional Economic Market Area (‘FEMA’) was carried out. Key points in relation to the Liverpool City HMA are:

- The 2014-based Subnational Population Projections (SNPP), mid-year population estimate shows that population is projected to increase by about 135,700 persons between 2012 and 2037, or 7.4 per cent.
- The 2014-based SNPP, re-based using the 2015 mid-year estimate, is the most reasonable projection of housing need and suggests a demographic-based need for 1,432 dpa in the Mid-Mersey HMA (comprising Halton, St Helens and Warrington) and 3,423 dpa in the Central LCR HMA (comprising Knowsley, Liverpool, Sefton, West Lancashire and Wirral).
- Land values across the City Region are typically below the national average, and median houses prices across the main towns is below £125,000.
- Lower quartile (entry level) house prices are below the national average, and only significantly above the North West average in West Lancashire and Warrington.
- House price growth has exceeded the regional average in West Lancashire, Wirral and Sefton in absolute terms over the longer-term; but in proportional terms only in Wirral. Growth in all areas has fallen below the national average.
- Rents are relatively low relative to national benchmarks, with no particularly high cost rental areas relative to the regional average. Rental growth since 2011 in all areas has been below regional / national benchmarks.
At a local authority level, the Baseline Economic Growth Scenario points to a higher level of housing need relative to the trend-based (2014-based) demographic projections in Halton, Warrington and West Lancashire.

The Growth Scenario results in a higher level of housing need, suggesting a need for 2,393 dpa in the Mid Mersey HMA and 3,729 dpa in the LCR HMA (2012-37).

Whilst there is evidence of under-delivery of housing, this principally relates to 2008-13, which correlates to a national slump in housing delivery influenced by macro-economic factors with a consequential reduction in demand.

2.49 Taking account of all of the factors considered, the 2017 SHELMA identifies an OAN of 1,739 dpa for the Liverpool City Council administrative area.

2.50 In using the more recent demographic projections, the SHELMA work updated the quantitative scale of housing need. To update the 2016 SHMA, Liverpool City Council commissioned two further updates, for its area alone, in respect of housing mix and older persons’ needs.

**Liverpool Housing Mix Update (December 2017)**

2.51 The key message from the Housing Mix Update is that there are a range of factors which influence demand for different sizes of homes, including demographic changes; future growth in real earnings and households’ ability to save; economic performance; and housing affordability.

2.52 The analysis linked to long-term (20-year) demographic change concludes that new market housing provision will be focussed on two- and three-bedroom properties. This is due to continued demand for family housing expected from newly forming households and some demand from older households downsizing and looking to release equity in existing homes, but still retain flexibility for friends and family to come and stay.

**Liverpool Older Persons’ Needs Update (December 2017)**

2.53 The Liverpool Older Persons’ Needs Update considers a range of issues, including accessibility and wheelchair housing standards with particular focus on the specific needs of older people. The findings of the study are relevant in informing future demands on housing provision within Liverpool, particularly in providing a range of accommodation suitable for specific users.

2.54 The report states that Liverpool has a higher level of disability when compared with the national position, and it contains the following key findings for the period 2013-2033:

- 3 per cent increase in the population aged 65+ (accounting for 56 per cent of total population growth);
- 6 per cent of household growth identified in the SHELMA projections is specialist housing for older persons;
- 43 per cent increase in the number of older people with mobility problems (representing 11 per cent of all population growth);
• 17 per cent increase in the number of people with a long-term health problem or disability (LTHPD) (representing 38 per cent of all population growth);
• concentrations of LTHPD in the social rented sector; and
• a need for around 5 per cent of dwellings to be accessible for wheelchair users.

2.55 Consequently, the report suggests that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings. Additionally, there is a need to consider a different approach for market housing and affordable homes, recognising that Registered Providers may already build to higher standards, and that households in the affordable sector are more likely to have some form of disability.

Recent Housing Delivery Monitoring

2.56 The city’s housing delivery performance in the period preceding the April 2017 SHLAA base date has been one of increasing provision since the low point due to the ‘credit-crunch’ and subsequent recession from 2007-2009. Table 2.1 below presents gross and net housing delivery between 2012 and 2017.

Table 2.1 Housing Delivery Since 2012

<table>
<thead>
<tr>
<th>Year</th>
<th>Gross Completions</th>
<th>Losses / demolitions</th>
<th>Net additional completions</th>
<th>Housing requirement</th>
<th>Difference from requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>2012/2013</td>
<td>1,237</td>
<td>341</td>
<td>896</td>
<td>1,739</td>
<td>-843</td>
</tr>
<tr>
<td>2013/2014</td>
<td>1,390</td>
<td>388</td>
<td>1,002</td>
<td>1,739</td>
<td>-737</td>
</tr>
<tr>
<td>2014/2015</td>
<td>1,663</td>
<td>154</td>
<td>1,509</td>
<td>1,739</td>
<td>-230</td>
</tr>
<tr>
<td>2015/2016</td>
<td>2,089</td>
<td>69</td>
<td>2,020</td>
<td>1,739</td>
<td>281</td>
</tr>
<tr>
<td>2016/2017</td>
<td>3,521</td>
<td>36</td>
<td>3,485</td>
<td>1,739</td>
<td>1,746</td>
</tr>
<tr>
<td>Total 2012-2017</td>
<td>9,900</td>
<td>988</td>
<td>8,912</td>
<td>8,695</td>
<td>217</td>
</tr>
<tr>
<td>Total 2013-2017</td>
<td>8,663</td>
<td>647</td>
<td>8,016</td>
<td>6,956</td>
<td>1,060</td>
</tr>
</tbody>
</table>

Source: Liverpool Monitoring Report, period to 2017

2.57 As is evident from Table 2.1, housing delivery has notably increased in recent years with significant delivery achieved in 2015/2016 and 2016/2017. This contrasts with lower housing delivery between 2012 and 2015, where gradual recovery from the recession is evident.

2.58 Table 2.1 also sets out the cumulative provision of housing between 2012 and 2017 (reflecting the SHELMA base date of 2012) and 2013 to 2017 (reflecting the emerging Local Plan base date of 2013). Cumulative housing provision in both cases results in a surplus position of:
• 217 dwellings between 2012 and 2017; and
• 1,060 dwellings between 2013 and 2017.

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2 Based on SHELMA OAN figure for Liverpool of 1,739, base dated to 2012
2.59 Consequently, there is no shortfall to be carried forward into the SHLAA assessment as no under-provision of housing has occurred during the relevant period.
3 STUDY METHODOLOGY

3.1 As we explained in Section 2, the PPG provides details on the methodology for undertaking a SHLAA, which has five main stages.

3.2 At the outset, we wish to emphasise that we have undertaken numerous land availability assessment studies across the country and so we are very familiar with the requirements of the PPG. We have applied our experience to the Liverpool study to ensure it is compliant with the PPG as well as the requirements of the NPPF.

Stage 1 – Site Identification

Study Area

3.3 The study area comprises the geographical area for which LCC has responsibility as the local planning authority.

3.4 The Council maintains a sites database which is annually updated with information regarding individual sites, reflecting the progress of development, including adjustments for new sites and removal of completed sites.

3.5 The sites database holds monitoring information based on annual survey work regarding sites with extant permission for housing development, which enables development progress to be tracked from start to completion. The annual update of the sites database includes removal of sites where permission has lapsed or where permission is granted for an alternative use which is likely to be delivered instead. The sites database at April 2017 contains 379 ‘committed’ sites.

3.6 The Council has drawn upon the sources identified in the PPG (Paragraph: 012 Reference ID: 3-012-20140306, which provides a list of possible sources for identifying potential residential sites), although many of the sites which do not have planning permission identified in the study were already known to the Council following previous consultations and ‘call for sites’ exercises. The majority of sites (644) contained within the current assessment are those previously assessed by the Council in 2016. However 50 newly submitted sites have also been , resulting in a total of 694 sites without planning permission being appraised as part of this SHLAA study.

3.7 As noted in Section 1, the Council has re-assessed the suitability and availability of the 644 sites within the SHLAA database, following the removal of one site that is wholly within the Green Belt. PBA then assessed the suitability and availability of the additional 50 sites submitted through the aforementioned call for sites exercised, as well as updating the achievability assessments for all 694 sites. The 379 SHLAA sites with planning permission have not been assessed, for the reasons given earlier.

3.8 PBA recorded site characteristics and various other information for each of the 50 additional sites, through a combination of desk-based research and site visits.

3.9 The PPG is clear that the SHLAA should identify as many sites as possible and that sites should not be excluded from the assessment simply because of current policy
designations. It is therefore largely a ‘policy-off’ approach aiming to ensure that as many sites as possible are considered by the Council. This includes sites which otherwise may be constrained by local planning policy (such as retail, industrial or greenspace sites). However, certain designations represent a significant constraint to development and may need to be wholly excluded from consideration at the outset. Accordingly, a site’s location fully within the Green Belt has been treated as an ‘absolute constraint’ and such sites are ruled out of the study.

3.10 The reasons for excluding sites that are fully within Green Belt are as follows:

- Green Belt is both a nationally important policy designation and Green Belt boundaries should only be amended in ‘exceptional circumstances’.
- The coverage of Green Belt within Liverpool’s administrative area is very limited at approximately 4 per cent.
- No release of Green Belt land is being proposed to meet planned residential development requirements through the emerging Local Plan.

3.11 The approach described above led to only one site being excluded from the assessment on the basis of it being within the Green Belt.

3.12 Another ‘absolute’ constraint relates to instances when a site has scored zero against the ‘Impact on Mersey Estuary SSSI / SPA / Ramsar’ policy-based constraint (see the Assessment Criteria Note – Appendix 1), in which case the site is automatically assigned to Verdict band 4\(^3\) and therefore falls outside of the full 15-year plan period.

3.13 Only a single site\(^4\) was excluded from the study as a result of being impacted by absolute constraints, namely being within the Green Belt or being within or adjacent to the Mersey Estuary SSSI / SPA, leaving 694 sites for consideration under the 2017 SHLAA assessment.

### Survey of Identified Additional Sites

3.14 As noted above, PBA recorded site characteristics and various other information for each of the additional 50 sites assessed in the SHLAA through a combination of desk-based research and site visits. In summary, the information collected included:

- site size in hectares and basic identifier information such as site name/address, and sources/references;
- current land uses both at the site and in the surrounding area;
- the surveyor’s assessment of what proportion of the site is available for development, taking account of any on-site permanent features;
- details of any obvious physical constraints in relation to site access, drainage, ground conditions, and so on;

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\(^3\) Verdict band 4 refers to sites which are assessed as scoring ‘0’ against the ‘Impact on Mersey Estuary SSSI / SPA / Ramsar’ suitability criterion. To score ‘0’ would mean that the site is entirely within the designation. Due to the significance of the designation, the site is judged not to be able to come forward within 15 years, thus falling outside of the SHLAA study period.

\(^4\) LCC site ref. 5610 - Victoria Falls Road, land (Former Cross Farm School), Belle Vale – due to falling entirely within the designated Green Belt.
bad neighbour uses, and the surveyor’s assessment of the severity of the constraint;
- details of anything that might affect availability or achievability; and
- the surveyor’s initial assessment of the site’s suitability for development.

3.15 LCC updated its assessment of the suitability and availability of the 644 sites that it had previously assessed and has now brought forward into the 2017 SHLAA, based on the principles outlined above. PBA then assessed afresh the achievability of all 694 sites (644 sites brought forward and the 50 new sites excluding the single site within the Green Belt) based on a ‘site typology’ approach which we outline in further detail below. It should be noted that no minimum site size threshold has been applied to the consideration of SHLAA sites. This is due to the predominantly urban nature of Liverpool producing a significant number of smaller development sites. The appropriateness of that approach is also reinforced by the relatively significant contribution of housing completions arising from small site opportunities.

3.16 At the outset, it is important to note that our site categorisation does not take account of all the policy considerations that are relevant in selecting sites for allocation, which are likely to include the broad sustainability of the site’s location as well as other impacts including, impact on biodiversity, strategic transport and other infrastructure capacity issues. Thus, we have not undertaken any analysis to consider whether the theoretical supply from sites assessed within the SHLAA is in the right place to meet strategic policy objectives of the emerging Local Plan.

3.17 Furthermore, in a strategic study such as this, it is not possible to assess physical constraints, availability and deliverability/viability in significant detail. In assessing sites, we have therefore necessarily focused on obvious constraints, taking account of the information we collected during our site visits.

Stage 2 – Site and Broad Location Assessment: Housing

Assessing Suitability, Availability and Achievability

3.18 The approach to site assessment, covering suitability, availability and achievability, is dependent on whether the site is a ‘commitment’ (has an extant planning permission) or is a potential site that the City Council is aware of but which does not have planning permission.

3.19 As set out in Section 2, footnote 11 of the NPPF states that committed sites can be considered suitable, available and achievable unless ‘there is clear evidence that schemes will not be implemented within five years’. LCC uses its site data – where possible informed by developers’ delivery profiles – to phase the delivery of sites which may span several years, or in the case of Liverpool Waters, two to three decades.

3.20 For a number of specific sites, intelligence has been ascertained which suggests that the site will take more than five years (e.g. sites which have commenced construction
that have subsequently ‘stalled’, often due to the specific circumstances of the individual developer). Such sites are considered no longer deliverable in the context of assessing five-year supply but remain ‘developable’ under footnote 12 of the 2012 NPPF. Thus the Council has revised the likely delivery of these sites to beyond 6 years to allow sufficient time for achievability constraints to be overcome.

3.21 We subjected all of the SHLAA sites to a comprehensive assessment against various ‘suitability’, ‘availability’ and ‘achievability’ criteria, as detailed in the Site Assessment Criteria note which is reproduced within Appendix 1 of the separate Appendices volume. The assessment criteria are closely related to the criteria referred to in the PPG. Our assessments thus provide a good indication of each site’s performance against a broad number of important measures.

3.22 Where constraints were identified that impact on the suitability, availability and achievability of sites, our assessment considered what action would be needed to overcome the constraints, along with when and how this could be undertaken and the likelihood of sites being delivered.

**Suitability**

3.23 As we explain more fully in Appendix 1, both PBA and LCC took into account the following planning considerations when assessing the suitability of sites:

- suitability of location (i.e. whether the site is within or adjacent to the boundary of a defined settlement);
- employment land considerations;
- access;
- ground conditions;
- bad neighbours;
- contaminated land;
- landscape;
- biodiversity;
- flood risk;
- green wedges;
- open spaces and;
- Mersey Estuary SSSI / RAMSAR / SPA.

3.24 If a site is affected by a one or more of the above constraints, it does not necessarily follow that the constraint could not be overcome, albeit certain core constraints are likely to prevent, or at the very least, delay the site coming forward until such time as it is possible or desirable, to overcome the constraint. The choice regarding which sites to take forward is primarily a matter for LCC in its capacity as the local planning authority. The role of the SHLAA is to provide objective evidence on the performance of known sites, to assist the authority in making appropriate choices.
3.25 A site is scored against each of the suitability criteria based on a range of between 0-5. In total, there are ten suitability criteria, leading to a maximum suitability score of 50. The scoring range (0-50) is divided into the following ‘verdict bands’:

- Sites with a total ‘suitability’ score of over 39 fall within verdict band 1 (site is suitable and could contribute to the five-year supply).
- Sites with a total ‘suitability’ score of 18-39 fall within verdict band 2 (site is potentially suitable but faces some constraints and should not be included in the five-year supply).
- Sites with a total ‘suitability’ score of under 18 fall within verdict band 3 (site faces significant suitability constraints).
- Verdict band 4 relates to sites which are assessed as not starting within the 15-year time horizon of the SHLAA assessment (see footnote on page 16). There are no verdict band 4 sites identified in the SHLAA as none fall within this criterion.

3.26 In addition, weightings are applied to ‘important’ suitability criteria as outlined in Appendix 1:

- if a site scores 0 or 1 against any of these important criteria, it is significantly constrained and the site can only fall within ‘suitability’ verdict band 3.
- If a site scores 2, 3 or 4 against any of these underlined criteria, the site can only fall within ‘suitability’ verdict band 2.

Availability

3.27 In assessing the availability of sites, we also took account of anything that might affect availability, using known information. Sites held by a developer/willing owner/public sector – for instance, call for sites submissions, and sites being actively marketed – and sites where it is known that pre-application discussions are underway, scored well within the assessment. Sites thought to be in particularly complex or multiple ownership did not score as well.

3.28 Thus, sites were scored on the following basis:

- Sites held by developer/willing owner/public sector (e.g. call for sites submissions, and sites being actively marketed), vacant land and buildings or sites where it is known that pre-application discussions are underway (5)
- Sites with vacant land and buildings (4)
- Sites with low intensity land uses use (e.g. such as agriculture, informal car parking) (3)
- Sites subject to an established single use (e.g. business, sports club, school etc) (2)
- Sites with established multiple uses (e.g. industrial estate, retail parade) (1)
- Sites thought to be in particularly complex/multiple ownership (e.g. industrial estate, retail parade etc) or apparently subject to ransom strip (0)

3.29 These scores are then translated into the following availability verdict bands:
A score of 5 falls within ‘availability’ verdict band of 1 (site is available and can be included in the 5-year supply).

A score of 2, 3 or 4 falls within ‘availability’ verdict band 2 (site is potentially available but faces some constraints and should not be included in the 5-year supply).

A score of 1 or 0 falls within ‘availability’ verdict band of 3 (site faces significant constraints).

Achievability

3.30 The PPG advises that ‘achievability’ is essentially a judgment about the economic viability of a site. For a strategic study such as this it is not necessary to undertake a detailed viability appraisal for each site.

3.31 However, for a robust assessment, LCC requested a multi-step approach to the assessment of achievability, which we detail below. This has been undertaken by AP Sheehan & Co Ltd (‘APS’).

3.32 Allied to the staged approach detailed below, APS has considered the various housing market issues affecting Liverpool at both the macro and micro levels, such as:

- Market factors – the attractiveness of the area and the likely level of potential market demand from different types of developers;
- Typical sales values – likely achievable values in the various sub-areas; and
- Cost factors – including potential site preparation costs relating to physical constraints and any exceptional works likely to be necessary.

Step 1A of the achievability assessment

3.33 PBA and APS identified five different housing market sub-areas (see Figure 3.1), based on grouped ward boundaries and taking into account APS’s professional opinion, housing market evidence (Appendix 2) and following discussions with local property market agents. The sub-areas were chosen on the basis of sharing broadly similar housing market values and characteristics. It is also consistent with the sub-area approach being taken forward by Keppie Massie as part of the Whole Plan Viability Assessment.
Figure 3.1 Housing Sub-Areas

Key
Liverpool Wards Sub-Areas
- City
- Inner Area
- Northern Fringe
- Outer Area
- Southern Fringe
3.34 The following representative site ‘typologies’ have been defined:
- small previously developed site (less than 0.4 ha);
- large previously developed site (greater than 0.4 ha);
- small greenfield site (less than 0.4 ha); and
- large greenfield site (greater than 0.4 ha).

3.35 As previously explained, the PPG is clear that the SHLAA should not exclude sites from the assessment because of current policy designations including greenspace sites.

3.36 A total of 200 high-level appraisals have been undertaken (see Appendix 5), equating to 40 high-level appraisals in each of the five sub-areas shown in Figure 3.1. As far as possible, 10 sites per typology have been tested within each sub-area. We have also sought to ensure that a proportionate number of sites from each ward is represented, to reflect the full spectrum of localities within each sub-area.

**Step 1B of the achievability assessment**

3.37 APS completed 50 more detailed site appraisals, comprising 10 in each of the five sub-areas. As with Step 1A, the samples are based on an even spread of the site typologies and wards as far as possible. These more detailed site appraisals provide a useful ‘check’ on the results of the high-level appraisals, which is inevitably an iterative process. In a small number of cases, therefore, the high-level appraisals have been adjusted to reflect the findings of the detailed site appraisal. The results of the high-level appraisals are shown in Appendix 5.

**Step 2 of the achievability assessment**

3.38 For budget reasons, it was not possible to undertake high-level appraisals for all of the SHLAA sites. The findings from the 200 high-level appraisals within the five sub-areas were therefore used to inform the achievability assessment for the remaining SHLAA sites. This was done by taking the typical development typologies identified under Step 1 and applying them to the assessment of achievability for each of the SHLAA sites by process of extrapolation (i.e. matching the most appropriate site typology and market area to the site under consideration). Once matched, the site is then assigned to the appropriate achievability banding as specified in the ‘Liverpool SHLAA 2017 criteria note’ (reproduced in Appendix 1).

3.39 Based on the above, sites were placed into the following achievability verdict bands:
- **Band 1** – Good marketability and/or viability. Site faces few achievability constraints and is likely to be achievable within 5 years.
- **Band 2** – Moderate marketability and/or viability. Site is potentially achievable but faces some constraints and should not be included in the five-year supply.

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5 Based on the professional knowledge of APS and discussions with agents rather than undertaking detailed site appraisals.

6 This has not been possible in the City Sub-Area due to the lack of available greenfield sites.
Band 3 – Poor marketability and/or viability. Site faces significant achievability constraints and is unlikely to be achievable within the first ten years.

3.40 The overall output from the achievability assessments described above – and our assessment of each site’s ‘suitability’ and ‘availability’ for residential use – determines which Category band each site is placed within, as follows:

- Sites which perform well against the suitability, availability and achievability assessments, and are therefore affected by the fewest constraints, will be placed into Category 1 (‘deliverable’ sites – 0-5 years).
- Sites which perform moderately well – that is, those sites which face more significant constraints, of whatever type – will be placed into Category 2 (‘developable’ sites – 6-10 years).
- Sites which perform least well against the assessments will be placed into Category 3 (‘least developable’ sites – beyond 10 years).

3.41 These overall categorisations are derived based on the permutations identified in Table 3.1 below.

### Table 3.1 Overall Categorisation of Sites

<table>
<thead>
<tr>
<th>Category of Sites</th>
<th>Permutation of Scores</th>
<th>Suitability Criteria Verdict</th>
<th>Availability Criteria Verdict</th>
<th>Achievability Criteria Verdict</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category 1 – Deliverable Sites</td>
<td>A</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Category 2 – Developable Sites</td>
<td>A</td>
<td>2</td>
<td>1-2</td>
<td>1-2</td>
</tr>
<tr>
<td></td>
<td>B</td>
<td>1-2</td>
<td>2</td>
<td>1-2</td>
</tr>
<tr>
<td></td>
<td>C</td>
<td>1-2</td>
<td>1-2</td>
<td>2</td>
</tr>
<tr>
<td>Category 3 – Not Currently Developable Sites</td>
<td>A</td>
<td>3</td>
<td>2-3</td>
<td>2-3</td>
</tr>
<tr>
<td></td>
<td>B</td>
<td>2-3</td>
<td>3</td>
<td>2-3</td>
</tr>
<tr>
<td></td>
<td>C</td>
<td>2-3</td>
<td>2-3</td>
<td>3</td>
</tr>
</tbody>
</table>

**Estimating the Housing Potential of Each Site**

3.42 In order to assess the number of dwellings that could theoretically be provided at each site, LCC and PBA applied a discount to the gross site area to take account of any permanent features. The scale of this discount reflects the proportion of the site that is subject to permanent features, which will therefore reduce the net developable area. We then applied the gross to net ratios identified in Table 3.2 in order to determine a realistic calculation of the yield that could potentially be achieved at each site:

---

7 The gross to net ratios are derived from ‘Tapping the Potential’ (DETR 2000), adapted by PBA to reflect our more recent experience around the country, and the particular characteristics of Liverpool. Whilst Table 3.2 provides an indicative estimation of the appropriate gross-to-net ratio, we acknowledge that site specific factors could result in a different ratio being more appropriate.
### Table 3.2 Gross-to-Net Ratios

<table>
<thead>
<tr>
<th>Site Area</th>
<th>Gross-to-Net Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt; 0.5ha</td>
<td>100%</td>
</tr>
<tr>
<td>0.5 – 0.9ha</td>
<td>90%</td>
</tr>
<tr>
<td>1.0 – 1.4ha</td>
<td>80%</td>
</tr>
<tr>
<td>1.5 – 2.0ha</td>
<td>70%</td>
</tr>
<tr>
<td>&gt;2.0ha</td>
<td>65%</td>
</tr>
</tbody>
</table>

3.43 As a matter of course in SHLAA studies, we also reduce the gross area of any sites that are partially covered by nationally important nature conservation designations. This approach provides a much more robust and realistic picture of potential housing delivery than simply applying a density to the gross site area. Where site specific information is available (such as promotional material or previous planning applications), this will be used to inform these factors where appropriate.

3.44 Having identified the net developable area of each site, an appropriate density is then applied to each housing site. The theoretical dwelling capacity of the study sites is therefore calculated on the following basis:

\[
\text{Gross site area} \times \text{permanent features factor} \times \text{gross to net factor} \times \text{density}
\]

3.45 The densities applied to the sites have been taken from known information such as planning application details, and/or site promoters’ information where available and/or LCC’s monitoring data where appropriate. Where no information is available the following density levels have been assumed, consistent with previous assessments:

- General housing – 36 dpa
- Mixed general housing and flatted schemes – 53 dpa
- Flats (within or adjacent to defined City or Local Centres) – 100 dpa
- Flats (within the City Centre) – 165 dpa

3.46 The densities specified above typically reflect the variations in densities apparent across the Liverpool City Council area, ranging from high density City Centre flatted schemes through to more traditional suburban housing. The gross to net and density assumptions also broadly align with the Whole Plan Viability Assessment being undertaken in parallel by Keppie Massie.

3.47 Appendix 7 contains a schedule of the assessed housing sites which summarises the overall site category rating for each site, together with the theoretical dwelling yield and phasing trajectory.

3.48 We recommend that the Council should regularly monitor market conditions, which will provide an updated view of trends in the housebuilding industry and potential changes in densities.
Stage 3 – Windfall Assessment

3.49 Annex 2 to the NPPF defines windfall sites as ‘sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.’ By extension to this NPPF definition, a common interpretation by local planning authorities is that windfall sites are therefore unallocated sites which unexpectedly come forward within the current plan-period.

3.50 It is implicit within the NPPF definition that an up-to-date local plan is in place. A specific difficulty in relation to assessing windfall in Liverpool is the age of LCC’s current development plan (the UDP) which, as previously noted, is time-expired having a plan period of 2002-2011. Therefore, in the absence of an up-to-date plan, there will inevitably be a significantly higher proportion of windfalls coming forward as UDP allocations will have been largely developed out and no new allocations will have been identified. This therefore does not represent a ‘normal’ position for the assessment of windfall contributions over the next 15-year period.

3.51 In the light of the above, LCC has adopted an alternative approach to the classification of windfall sites, to inform its approach to deriving a windfall assumption. LCC’s approach is to count sites that come forward as ‘windfall’ where they have not been identified within the schedule of sites considered in the 2012 SHLAA. This is an interim measure until LCC adopts a new Local Plan which will then provide an up-to-date basis on which to judge windfall delivery in accordance with the NPPF definition.

3.52 Using the 2012 SHLAA as the basis of calculating windfall delivery represents the best objective measure in the absence of an up-to-date development plan. Indeed, it could be argued that it actually reduces the number of windfall sites being identified, as the SHLAA assessment inevitably highlights a more significant range of sites than would be identified in the Local Plan.

3.53 Paragraph 48 of the NPPF explains that windfall sites may be justified by the local authority as part of the housing land 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.’

3.54 Paragraph 47 of the NPPF also states that the housing supply for the first five years should be based on ‘specific deliverable sites’.

3.55 We note that the pre-submission draft Local Plan assumes a figure of 130 dpa, which is 50 per cent of the annual average figure delivered over the 2011 to 2016 period (260 dpa), based on the LCC’s alternative approach to defining windfalls as described above. On the basis of past trends, we consider the figure of 130 dpa to be a realistic and appropriate windfall assumption.

3.56 We therefore include a windfall assumption based on the 130 dpa figure. Whilst we would normally seek to apply the windfall allowance from year three of the study
onwards\(^8\), owing to the significant level of windfall completions and stricter definition, applied by the City Council itself, of what constitutes a windfall site, we have applied the windfall allowance from Year 1 in this case.

3.57 Future reviews of the SHLAA will need to review the level of windfall assumption to ensure its appropriateness, particularly as the Local Plan is taken forward.

**Stage 4 – Assessment Review**

**Time Horizon and Study Base Date**

3.58 The PPG states that once the sites and broad locations have been assessed, the development potential of all sites can be collated to produce a projection of housing delivery, which sets out how much housing land can be provided and when it might come forward. Appendix 7 provides an indication of the anticipated yield from those sites without planning permission considered through the SHLAA.

3.59 Paragraph 47 of the NPPF requires LPAs to identify a supply of ‘deliverable’ housing sites for the first five years and a further supply of ‘developable’ sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15. Each housing site was therefore assigned an expected timescale for delivery: 1-5 years, 6-10 years or 11-15 years. For a small number of schemes, either through a known programme which extends beyond 15 years (i.e. Liverpool Waters) or those sites which are expected to continue to be developed beyond 15 years, a fourth phasing period of ‘15+’ plus years is included. These timescales depend on the information known about each site in relation to its suitability and availability for housing at the time of the assessment. The yield figures and anticipated phasing are shown in Appendix 7 of Volume B.

3.60 We consider that 1 April 2017 represents an appropriate study base date, as this will ensure that the evidence presented on past completions and outstanding commitments is up-to-date and comprehensive. The 1 April 2017 base date is used for identifying both deliverable and developable supply, cumulatively over the first five years, ten years and 15 years from the base date. Accordingly, we have assessed housing potential for each of the periods 2017 to 2022 (first five years), 2017 to 2027 (ten years) and 2017 to 2032 (15 years).

3.61 In accordance with the guidance, the SHLAA should be regularly kept up-to-date as part of the annual Monitoring Report exercise, so as to support the updating of the housing trajectory and the rolling five-year supply of specific deliverable sites.

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\(^8\) To avoid double-counting with the contribution from sites with extant planning permission and to take into account lead-in times for actual delivery at any new windfall sites that come forward in the first few years.
Stage 5 – Final Evidence Base

Site Categorisation

3.62 At this stage of the study we undertake our assessment of each site and/or broad location, looking at their suitability, availability and achievability, to determine whether a site is realistically expected to be developed and when.

3.63 Through our assessments of suitability, availability and achievability, each site was placed into one of three ‘Category’ bands\(^9\), as shown in Table 3.1 above, and as described as follows:

- Sites which perform well against the suitability, availability and achievability assessments, and are therefore affected by the fewest constraints, are considered to be ‘deliverable’ and were therefore placed into Category 1. It is important to emphasise that for a site to achieve a Category 1 rating, it would need to be suitable, and available (or capable of being made available) within five years, and achievable.

- Sites with a limited level of constraints, such that they are likely to be available for delivery after the first five years, were placed into Category 2. These ‘developable’ sites may be suitable for development, depending on their individual circumstances and on specific measures being proposed to overcome their constraints within a 6 to 10-year time horizon.

- Sites allocated to Category 3 are classified as being ‘not currently developable’ and have more significant constraints. For these sites to be considered appropriate for development it would have to be clearly demonstrated that the significant constraints affecting these sites – which could relate to suitability, availability or achievability factors, or a combination thereof – can be mitigated or overcome to make them deliverable.

3.64 The overall categorisation of a site therefore depends on the particular combination of constraints affecting it. The scores achieved by each site under each criterion, are used to determine why each site has been assigned to a particular Category band. Thus, it is immediately apparent whether a site is affected by particular constraints and, hence, what sort of intervention or amendments to policy constraints will be required in order to make the site deliverable. A summary table containing assessed housing sites and their categorisation scoring is provided within Appendix 7.

3.65 Predicting when each site is likely to come forward for development is not an exact science. The placing of a site into one of the three Category bands is therefore intended to give a useful indication of the deliverability and potential timing of a site’s development.

3.66 The inclusion of a site within a higher Category band should not be taken to represent a recommendation that it should be allocated, as our categorisation process does not take account of all the policy considerations that are relevant in

\(^9\) Our definitions match those specified in footnotes 11 and 12 on page 12 of the NPPF.
selecting sites for allocation. Equally, it should not be concluded that a site assigned to a lower Category band cannot come forward, or that it cannot be allocated for development. Rather, it would need to be demonstrated that the site’s constraints could – or, in the case of environmental designations, should – be overcome in order to secure its deliverability. As highlighted previously we emphasise that the SHLAA neither advocates nor designates sites for development.
4 STUDY FINDINGS

4.1 The assessment of potential housing supply is not a forecast or prediction; it is an assessment based on capacity within identified sites and an allowance for windfall, measured against an annual housing requirement figure over various timeframes.

4.2 In this section, we provide the results from the study and assess whether, and how, the identified dwelling targets can be achieved. In summary, our approach is to:

- identify the 5, 10 and 15-year dwelling targets, taking account of any previous under or over-provision against the identified targets;
- identify the supply from housing commitments;
- establish the potential supply from Category 1 (‘deliverable’), Category 2 (‘developable’) and Category 3 (‘developable, with significant constraints’) sites; and
- assess whether the identified supply from outstanding planning commitments and the specific sites that we have assessed in the SHLAA is sufficient to meet the 5, 10 and 15-year dwelling targets.

Dwelling Targets

4.3 As referred to in Section 2, Liverpool does not have an up to date adopted housing requirement figure and it is not appropriate to use the out of date UDP housing requirement figure as the basis of the dwelling target.

4.4 The 2017 SHELMA, based on the most recent projections, identifies a requirement for 1,739 net additional dwellings per annum, which has been taken forward in the pre-submission draft of the Local Plan. On this basis, PBA therefore used 1,739 dpa as the appropriate housing requirement figure to identify whether the dwelling target can be achieved over the SHLAA’s 15-year study period (equating to 26,085 dwellings between 2017 and 2032).

4.5 As outlined in Section 2, national planning policy and guidance requires the dwelling target to be adjusted to take into account any shortfall prior to the start of the assessment base date, and any shortfall should be addressed within the first five years of the base date. If this is not realistic, the planning authority should justify an alternative approach for making up any previous shortfall in housing delivery. As shown in Table 2.1, the latest available data from the Council for housing delivery to 31 March 2017 indicates a surplus position of more than 200 dwellings.

Shortfall / Surplus Position

4.6 Between 2012 and 2017 (beginning from the SHELMA base date), from which the dwelling target of 1,739 dpa has been derived, 8,912 net additional dwellings were delivered. This equates to an excess of 217 dwellings over the SHELMA dwelling target of 8,695 (1,739 dwellings x 5 years).
4.7 Between 2013 and 2017 (coinciding with the submitted Local Plan base date), 8,016 net additional dwellings were delivered against a dwelling target of 6,956 dwellings (based on the SHELMA 1,739 figure multiplied by 4 years). This equates to a more substantial surplus of 1,060 dwellings over that period.

4.8 As shown in Table 4.1, for both the preceding 5-year (2012-2017) and 4-year (2013-2017) periods there is a surplus position due to substantially increased levels of completions in the period between 2015 and 2017. Therefore, no accrued shortfall exists when judged against the dwelling target to be taken into account at the 2017 base date.

Table 4.1 Shortfall or Surplus in Housing Delivery (2012 to 2017)

<table>
<thead>
<tr>
<th>Shortfall or Surplus (2012 - 2017)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Annualised submitted Local Plan Housing Target (1,739 per annum)</td>
<td>1,739 dwellings</td>
</tr>
<tr>
<td>Requirement from 2012 to 2017 (1,739 x 5)</td>
<td>8,695 dwellings</td>
</tr>
<tr>
<td>Net Completions (2012 – 2017)</td>
<td>8,912 dwellings</td>
</tr>
<tr>
<td><strong>Surplus 2012 to 2017 (8,921 minus 8,695)</strong></td>
<td><strong>217 dwellings</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Shortfall or Surplus (2013 - 2017)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Annualised submitted Local Plan Housing Target (1,739 per annum)</td>
<td>1,739 dwellings</td>
</tr>
<tr>
<td>Requirement from 2013 to 2017 (1,739 x 4)</td>
<td>6,956 dwellings</td>
</tr>
<tr>
<td>Net Completions (2013 – 2017)</td>
<td>8,016 dwellings</td>
</tr>
<tr>
<td><strong>Surplus 2013 to 2017 (8,016 minus 6,956)</strong></td>
<td><strong>1,060 dwellings</strong></td>
</tr>
<tr>
<td><strong>Zero-based figure 2012-2017 utilised in this report</strong></td>
<td><strong>0 dwellings</strong></td>
</tr>
</tbody>
</table>

4.9 Rather than subtract the overprovision of either 1,060 or 217 dwellings from the remaining requirement, we have assumed a ‘zero-based’ figure (that is, not reflecting the surplus position) in the following Tables 4.2 to 4.7. This approach has been taken for the purposes of reducing the amount of scenarios reflected in the tables. It should of course be noted that the Council is entitled to take into account the past over provision of housing, dependent on which base date (SHELMA or submitted Local Plan) is chosen.

**NPPF Buffer**

4.10 As described in Section 3, it is necessary to adjust the dwelling target with the application of the appropriate NPPF buffer brought forward from later in the plan period. The NPPF requires a 5 or 20 per cent buffer to be applied, the latter applying should the authority be considered to have persistently under-delivered against its housing requirement. Whilst LCC does not consider that it has persistently under delivered against the relevant housing requirement figure, for completeness we test both a 5 per cent and 20 per cent NPPF buffer figure in Tables 4.2 and 4.3, respectively.

4.11 In effect, the incorporation of a 5 or 20 per cent buffer applied to the first five-year period increases the dwelling target calculation for the whole plan, unless there is a corresponding reduction in the final phasing periods. However, the NPPF is clear in
paragraph 47 that the role of the buffer is to enable the local authority to meet its housing requirement and not to inflate the requirement per se (notwithstanding the need to apply a NPPF buffer as a rolling requirement). Therefore, it is necessary to adjust the dwelling targets for the 6-10 and 11-15 year periods to reflect the fact that the overall 15-year requirement remains constant (namely 26,085 dwellings based on 15 years x 1,739 dwellings).

Demolition allowance

A demolition allowance of 10 dwellings per annum has also been factored into the assessment, equating to 50 dwellings in each five-year period. The allowance is based on recent past trends covering the demolition or other loss of dwellings from the existing housing stock (excluding housing market renewal activity which has now ended). We have reflected this allowance in the assessment by subtracting it from the windfall allowance i.e. resulting in a net windfall figure of 120 dpa.

Housing Requirements over the Plan Period

Tables 4.2 and 4.3 detail the five-year housing requirement. As there is no shortfall to add to the requirements, this is based on the housing requirement figure plus the NPPF buffer. Whilst LCC does not consider that it has persistently under delivered against the relevant housing requirement figure, for completeness we test both a 5 per cent and 20 per cent NPPF buffer figure in Tables 4.2 and 4.3, respectively. This results in a total five-year requirement of 9,130 dwellings (5 per cent buffer) and 10,494 dwellings (20 per cent buffer).

Tables 4.4 and 4.5 repeat the process for the 10-year target by adding together the first five-year requirement (plus re-adjusting for the application of either a 5 or 20 per cent NPPF buffer in the first 5-year period) with the second five-year period (leading to a total ten-year requirement of 17,607 dwellings (adjusted 5 per cent buffer for first 5-year period) and 18,260 dwellings (adjusted 20 per cent buffer for first 5-year period), respectively. Tables 4.6 and 4.7 repeat the process for the 15-year target, leading to a total 15-year requirement of 26,085 dwellings under both scenarios.

For the avoidance of doubt, the NPPF ‘buffer’ (5 or 20 per cent brought forward from later in the plan period) has been applied to the first five-year period and removed from the subsequent years’ requirements (a 50:50 split between the 10 and 15 years’ requirements respectively). Therefore, the total housing requirement over the 15-year period under both scenarios remains at 26,085 dwellings, which is the SHELMA-derived OAN figure of 1,739 x 15 years.

As already noted, the conclusions above are derived from the ‘zero based’ calculations, not taking into account any surplus housing completions against the emerging plan target of 1,739 dwellings per year (reflecting the SHELMA requirement). Alternatively, the City Council is entitled to take into account the overprovision of housing through the consequential reduction of the 1,739 annual requirement. As specified in Table 4.1, the total level of current overprovision equates to either 217 dwellings (between 2012 and 2017) base date) or 1,060 dwellings (between 2013 and 2017). This would also have a consequential effect on
the level of 5-year housing supply, increasing the indicated level of supply further. The approach advocated by PBA for this study as an objective technical evidence document, is to adopt a ‘zero-based’ assumption on past housing delivery.

Cumulative Dwelling Targets (5 years with 5% and 20% buffers, 10 and 15 year periods)

Table 4.2 Five-Year Housing Requirement (2017 to 2022) with 5% NPPF ‘Buffer’

<table>
<thead>
<tr>
<th>Five-Year Housing Requirement plus NPPF buffer (2017 - 2022)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Basic Five-Year Requirement (1,739 x 5)</td>
</tr>
<tr>
<td>Add Shortfall (2012 to 2017)</td>
</tr>
<tr>
<td>Add 5% ‘buffer’</td>
</tr>
<tr>
<td>Total Five-Year Requirement including 5% NPPF ‘Buffer’</td>
</tr>
</tbody>
</table>

Table 4.3 Five-Year Housing Requirement (2017 to 2022) with 20% NPPF ‘Buffer’

<table>
<thead>
<tr>
<th>Five-Year Housing Requirement plus NPPF buffer (2017 - 2022)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Basic Five-Year Requirement (1,739 x 5)</td>
</tr>
<tr>
<td>Add Shortfall (2012 to 2017)</td>
</tr>
<tr>
<td>Add 20% ‘buffer’</td>
</tr>
<tr>
<td>Total Five-Year Requirement including 20% NPPF ‘Buffer’</td>
</tr>
</tbody>
</table>

Table 4.4 Ten-Year Housing Requirement (2017 to 2027) adjusted for 5% NPPF ‘Buffer’ applied to first 5-year period

<table>
<thead>
<tr>
<th>Ten-Year Housing Requirement plus initial NPPF buffer (2017 - 2027)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Five-Year Requirement plus shortfall and 5% NPPF ‘Buffer’</td>
</tr>
<tr>
<td>Add Second Five-Year Requirement</td>
</tr>
<tr>
<td>Minus 50% of first five-year NPPF buffer</td>
</tr>
<tr>
<td>Ten-Year Requirement</td>
</tr>
</tbody>
</table>

Table 4.5 Ten-Year Housing Requirement (2017 to 2027) adjusted for 20% NPPF ‘Buffer’ applied to first 5-year period

<table>
<thead>
<tr>
<th>Ten-Year Housing Requirement plus initial NPPF buffer (2017 - 2027)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Five-Year Requirement plus shortfall and 20% NPPF ‘Buffer’</td>
</tr>
<tr>
<td>Add Second Five-Year Requirement</td>
</tr>
<tr>
<td>Minus 50% of first five-year NPPF buffer</td>
</tr>
<tr>
<td>Ten-Year Requirement</td>
</tr>
</tbody>
</table>

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10 See ‘Shortfall/Surplus Position’ sub-section
Table 4.6 15-Year Housing Requirement (2017 to 2032) adjusted for 5% NPPF ‘Buffer’ applied to first 5-year period

<table>
<thead>
<tr>
<th>15-Year Housing Requirement (2017 - 2032)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Ten-Year Requirement plus shortfall and 5% NPPF ‘Buffer’</td>
<td>17,607 dwellings</td>
</tr>
<tr>
<td>Add Third Five-Year Requirement</td>
<td>8,695 dwellings</td>
</tr>
<tr>
<td>Minus 50% of first five-year NPPF buffer</td>
<td>-217 dwellings</td>
</tr>
<tr>
<td>15-Year Requirement</td>
<td>26,085 dwellings</td>
</tr>
</tbody>
</table>

Table 4.7 15-Year Housing Requirement (2017 to 2032) adjusted for 20% NPPF ‘Buffer’ applied to first 5-year period

<table>
<thead>
<tr>
<th>15-Year Housing Requirement (2017 - 2032)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Ten-Year Requirement plus shortfall and 20% NPPF ‘Buffer’</td>
<td>18,260 dwellings</td>
</tr>
<tr>
<td>Add Third Five-Year Requirement</td>
<td>8,695 dwellings</td>
</tr>
<tr>
<td>Minus 50% of first five-year NPPF buffer</td>
<td>-870 dwellings</td>
</tr>
<tr>
<td>15-Year Requirement</td>
<td>26,085 dwellings</td>
</tr>
</tbody>
</table>

Housing Commitments

4.17 The data provided by the Council indicate that there was a substantial supply, at April 2017, of 26,668 dwellings, from sites with extant planning permission (both in outline and full) and those sites with a resolution to approve subject to the completion of a Section 106 legal agreement. It should be noted, however, that this includes a small number of substantial planning permissions (such as Liverpool Waters\(^{11}\) and Festival Gardens\(^{12}\)) which are not predicted to be fully delivered within the study period. In these cases, an assumption has been applied in relation to likely delivery based on figures provided by the developer directly or based on the judgement of Council officers. Taking this into account, as at April 2017 the supply predicted to come forward in the 15-year plan period is 21,177 dwellings (as shown in Appendix 2).

4.18 The figure of 21,177 dwellings, incorporating site-specific phasing, represents LCC’s judgement on the ‘deliverability’ of the sites in accordance with paragraph 47 (including related footnote 11) of the 2012 NPPF, particularly taking into account the burden of evidence required to support deliverability as clarified by recent appeal decisions and High Court judgements\(^{13}\), specifically that:

- ‘for a site to be deliverable, it should be capable of being delivered not that it will be delivered’; and

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\(^{11}\) We have utilised the latest predicted housing delivery figures at Liverpool Waters provided by the Peel Group.

\(^{12}\) Due to significant remediation issues, delivery from the Festival Gardens site is not predicted to start until the 6-10 year and 11-15 year periods. However, LCC is actively seeking a joint venture partner to take forward the site in accordance with an updated development framework covering the site and so the likely deliverability and developability of the site will need to be closely monitored.

\(^{13}\) St Modwen Development Limited v Secretary of State for Communities and Local Government and Others [2017] EWCA Civ 1643.
4.19 We have assumed that a windfall contribution of 130 dwellings per annum will come forward based on past trends, equating to a total of 1,950 dwellings over the 15-year assessment period. Additionally, we have also applied a demolition allowance of 10 dwellings per annum, equating to 150 dwellings over the 15-year assessment period.

4.20 Part of the committed supply comprises varying forms of student accommodation. The PPG states in Paragraph: 038 Reference ID: 3-038-20140306 that “All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market.” Therefore, it is appropriate to include student accommodation in the committed supply, albeit the rate of release is dependent on the form and density of the accommodation. The approach taken within this study is to apply a ‘market release’ factor of 5:1 (5 students to 1 market release) in relation to student studio flats, but no factor is applied to cluster accommodation due to the higher density of students within each unit. Accordingly, all committed supply which involves student studio flats has been discounted to 20 per cent of their total number. This is considered to be a robust approach in line with the advice set out in the PPG.

4.21 Furthermore, it is reasonable to assume that not all of the committed units will be delivered in their current form. For instance, in some cases the developer may have to amend its intentions in order to make the scheme more viable because of economic circumstances or sites may not come forward at all due to a variety of market and cost factors.

4.22 To ensure a robust approach, we consider that there is a need to make an allowance for ‘non-implementation’ of a proportion of the outstanding commitments. In order to ensure that our assessment is as robust and realistic as possible, we have applied a 10 per cent ‘non-implementation’ rate to the total dwelling supply from sites with planning permission.

4.23 A breakdown of this supply is included at Table 4.8 below.

Table 4.8 Housing Commitments

<table>
<thead>
<tr>
<th>Housing Commitments (2017 - 2032)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>City-wide Commitments</td>
<td>21,177 dwellings</td>
</tr>
<tr>
<td>- Apply 10% ‘non-implementation’</td>
<td>- 2,118 dwellings</td>
</tr>
<tr>
<td>Net Housing Commitments</td>
<td>19,059 dwellings</td>
</tr>
</tbody>
</table>

4.24 Future updates of the SHLAA will provide an opportunity to monitor the number of completed and committed dwellings.

14 Derived from the Liverpool SHMA, July 2016.
15 Where student schemes do not distinguish between studio or cluster accommodation, the factor has been applied to all accommodation.
Theoretical Dwelling Supply – Sites Without Planning Permission

4.25 We have identified the theoretical dwelling supply from the 694 sites in the SHLAA which do not have planning permission, and which have been assessed to be suitable, available and achievable and placed each of the sites into one of the three Category bands (see also Table 3.1 and for a full list of all the 694 sites see Appendices 3, 4 and 5):

- **Category 1** (‘deliverable’) – site is suitable, available and achievable and faces no constraints which might prevent it from coming forward within the first five-year period;
- **Category 2** (‘developable’) – site faces some constraints of either suitability, availability or achievability and would not be expected to come forward within the first five-year period, but could still be expected to come forward within the second five-year period; and
- **Category 3** (‘not currently developable with multiple constraints’) – site faces more significant constraints, and would not be expected to come forward within the first 10-year SHLAA assessment period, although it might be expected to come forward in the third five-year period.

4.26 Table 4.9 below summarises the theoretical dwelling supply from SHLAA sites, broken down by Category band and land designation status:

**Table 4.9 Summary of Supply from SHLAA sites without Planning Permission**

<table>
<thead>
<tr>
<th>Category</th>
<th>Total</th>
<th>1</th>
<th>2</th>
<th>3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Sites</td>
<td>24</td>
<td>332</td>
<td>146</td>
<td>502</td>
</tr>
<tr>
<td>Area (ha)</td>
<td>17.4</td>
<td>91.1</td>
<td>116.7</td>
<td>225.1</td>
</tr>
<tr>
<td>Yield</td>
<td>780</td>
<td>5,947</td>
<td>7,680</td>
<td>14,407</td>
</tr>
<tr>
<td>Previously Developed</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of Sites</td>
<td>0</td>
<td>57</td>
<td>135</td>
<td>192</td>
</tr>
<tr>
<td>Area (ha)</td>
<td>0.0</td>
<td>21.4</td>
<td>137.8</td>
<td>159.1</td>
</tr>
<tr>
<td>Yield</td>
<td>0</td>
<td>655</td>
<td>4,102</td>
<td>4,757</td>
</tr>
<tr>
<td>Greenfield</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>24</td>
<td>389</td>
<td>281</td>
<td>694</td>
</tr>
<tr>
<td>Area (ha)</td>
<td>17.4</td>
<td>112.4</td>
<td>254.4</td>
<td>384.2</td>
</tr>
<tr>
<td>Yield</td>
<td>780</td>
<td>6,601</td>
<td>11,782</td>
<td>19,163</td>
</tr>
</tbody>
</table>

NB: Numbers are subject to rounding and therefore figures may not sum

---

16 Where the site is a mixed previously developed and greenfield (which relates to a total of 9 sites), it has been assumed that the site is greenfield for the purposes of this assessment.
From the table above, it can be seen that:

- The 694 housing sites could potentially yield around 19,163 dwellings.
- Of this theoretical capacity, 780 units are from 24 sites assessed as being ‘deliverable’ (i.e. Category 1), with a further 6,601 dwellings from 389 ‘developable’ sites (Category 2) and 11,782 units from 281 sites which are not currently developable (Category 3) but which could come forward at some point in the future.
- Previously developed sites could theoretically deliver 14,407 dwellings, of which 780 dwellings could come forward in the first five-year period (Category 1). Beyond this, 5,947 units have been identified from ‘developable’ PDL sites (Category 2), and 7,680 units are derived from PDL on sites which are not currently developable (Category 3).
- Greenfield sites could theoretically deliver 4,757 dwellings, of which 0 dwellings could come forward in the first five-year period (Category 1). Beyond this, 655 units have been identified from ‘developable’ greenfield sites (Category 2), and 4,102 units are derived from greenfield sites which are not currently developable (Category 3).

Adequacy of Housing Provision

In Table 4.10 below we assess whether the City-wide dwelling targets can be achieved through a combination of outstanding planning commitments together with windfall sites and the 694 housing sites without planning permission.

Approach

The components of potential housing supply, as set out in Tables 4.10 and 4.11 below, are referenced as follows:

- PC (‘Planning Commitments’) = dwellings under construction or with planning permission (having made an allowance for non-delivery, as described earlier in this section);
- WF/DA (‘Windfall and Demolition Allowance’) = an allowance of 600 dwellings for each 5-year period has been applied which comprises a 650-dwelling windfall allowance minus a 50-dwelling demolition allowance (as described earlier in this section); and
- C1, C2, C3 (‘Category’ bands 1, 2 and 3) = potential from the 694 housing sites in the SHLAA in the 1-5, 6-10 and 11-15 assessment periods.

There is no definitive ‘answer’ and so, within each period, the theoretical yield from a combination of components is compared with the dwelling target for the period. Where a combination is sufficient to meet the target, the yield is highlighted in green. It is therefore immediately apparent to what extent the potential housing supply for a period is sufficient to meet the target.

Our site categorisation does not take account of all the policy considerations that are relevant in selecting sites for allocation, which are likely to include the broad...
sustainability of the total development pattern, impact on biodiversity and landscape, and strategic transport and other infrastructure capacity issues. Thus, we have not undertaken any analysis to consider whether the Category 1 supply is in the right place to meet strategic policy objectives.

4.32 As mentioned previously, it should be noted that the dwelling requirement figures are derived from the zero-based calculation. If the residual calculation method was used, then the dwelling requirement would be consequently reduced dependent on the scenario chosen (see Table 4.1).

Table 4.10 Adequacy of Cumulative Housing Potential in Liverpool, Forthcoming 5, 10 and 15-Year Periods (5% NPPF ‘Buffer’ in 1st 5 years)

<table>
<thead>
<tr>
<th>Period</th>
<th>Component</th>
<th>Total Yield</th>
</tr>
</thead>
<tbody>
<tr>
<td>First 5 years</td>
<td>PC</td>
<td>14,888</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA</td>
<td>15,488</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1</td>
<td>16,268</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2</td>
<td>22,869</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2 + C3</td>
<td>34,651</td>
</tr>
<tr>
<td></td>
<td><strong>Dwelling Requirement</strong></td>
<td><strong>9,130</strong></td>
</tr>
<tr>
<td>First 10 years</td>
<td>PC</td>
<td>17,700</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA</td>
<td>18,900</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1</td>
<td>19,680</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2</td>
<td>26,281</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2 + C3</td>
<td>38,063</td>
</tr>
<tr>
<td></td>
<td><strong>Dwelling Requirement</strong></td>
<td><strong>17,607</strong></td>
</tr>
<tr>
<td>First 15 years</td>
<td>PC</td>
<td>19,059</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA</td>
<td>20,859</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1</td>
<td>21,639</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2</td>
<td>28,240</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DO + C1 + C2 + C3</td>
<td>40,022</td>
</tr>
<tr>
<td></td>
<td><strong>Dwelling Requirement</strong></td>
<td><strong>26,085</strong></td>
</tr>
</tbody>
</table>
Table 4.11 Adequacy of Cumulative Housing Potential in Liverpool, Forthcoming 5, 10 and 15-Year Periods (20% NPPF ‘Buffer’ in 1st 5 years)

<table>
<thead>
<tr>
<th>Period</th>
<th>Component</th>
<th>Total Yield</th>
</tr>
</thead>
<tbody>
<tr>
<td>First 5 years</td>
<td>PC</td>
<td>14,888</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA</td>
<td>15,488</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1</td>
<td>16,268</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2</td>
<td>22,869</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2 + C3</td>
<td>34,651</td>
</tr>
<tr>
<td></td>
<td><strong>Dwelling Requirement</strong></td>
<td><strong>10,434</strong></td>
</tr>
<tr>
<td>First 10 years</td>
<td>PC</td>
<td>17,700</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA</td>
<td>18,900</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1</td>
<td>19,680</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2</td>
<td>26,281</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2 + C3</td>
<td>38,063</td>
</tr>
<tr>
<td></td>
<td><strong>Dwelling Requirement</strong></td>
<td><strong>18,260</strong></td>
</tr>
<tr>
<td>First 15 years</td>
<td>PC</td>
<td>19,059</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA</td>
<td>20,859</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1</td>
<td>21,639</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2</td>
<td>28,240</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2 + C3</td>
<td>40,022</td>
</tr>
<tr>
<td></td>
<td><strong>Dwelling Requirement</strong></td>
<td><strong>26,085</strong></td>
</tr>
</tbody>
</table>

Summary of Findings

First Five-Year Period

4.33 Taking the ‘zero-based’ figure in relation to past housing delivery used in this assessment, Tables 4.10 and 4.11 confirm that outstanding planning commitments together with the inclusion of a windfall allowance (after a non-implementation rate discussed earlier in this section has been applied) is sufficient to meet the target for the first five years of 9,130 dwellings (with a 5 per cent buffer applied to the first 5-year period) and 10,434 dwellings (with a 20 per cent buffer applied to the first 5-year period). This can be done without the need to being forward any of the SHLAA sites which do not have planning permission, owing to the significant level of existing commitments. However, this does not preclude such sites coming forward over the same period, as there are is an indicative supply of 790 dwellings from Category 1 sites.

4.34 However, should, either of the 2012-2017 or 2013-2017 housing delivery surplus positions (as shown in Table 4.1) be taken into account under a residual calculation approach, the first five-year housing supply position would be more favourable. The City Council will take forward its preferred approach as part of the examination of the Local Plan.
Ten-Year and 15-Year Assessment Periods

4.35 The assessment’s cumulative approach brings forward the first 5-year housing supply position (with 5 per cent and 20 per cent buffers) into the assessment of the ten and 15 year periods, based on the April 2017 base date.

4.36 The 10-year target of 17,607 dwellings (under the 5 per cent ‘buffer’ scenario applied to the first five-year period) can also be fully met based on outstanding planning commitments alone taking into account the application of the ten per cent non-implementation allowance. However, the 10-year target of 18,260 dwellings (under the 20 per cent ‘buffer’ scenario applied to the first five-year period) cannot be met fully by existing commitments alone and requires the inclusion of the windfall allowance. No Category 1, 2 or 3 sites are required to come forward to meet the 10-year target.

4.37 Tables 4.10 and 4.11 show a requirement of 26,085 dwellings under both the 5 per cent and 20 per cent buffer scenarios. As the application of the NPPF buffer has been fully adjusted at this point, the dwelling target under both scenarios is identical. Tables 4.10 and 4.11 show that the 15-year requirement can be met if all Category 1 sites and a significant proportion of Category 2 sites are brought forward. No Category 3 sites are required under either of the 15-year scenarios.

4.38 Given that the maximum 15-year dwelling requirement for Liverpool is 26,085 dwellings (under both the 5 per cent and 20 per cent NPPF buffer scenarios as well as adopting a ‘zero based’ approach in the first 5-year period), the findings outlined above suggest that there are more than sufficient sites identified in the SHLAA to accommodate that requirement.

4.39 However, it is likely to be necessary for the Council to make choices over sites which are not currently suitable due to conflict with local policy designations. For example, a significant proportion of Category 2 sites comprise formal or informal open space, which is an important constraint that may be difficult or undesirable to overcome in many cases. This is ultimately a policy choice to be considered by LCC and is outside of the remit of the SHLAA.

4.40 As Tables 4.10 and 4.11 demonstrate, no Category 3 sites are required, under any scenario. This provides a degree of ‘headroom’ for choices over which sites can be brought forward. It is also highly likely that additional SHLAA sites will be identified as part of future reviews, which will bolster the number of SHLAA sites under consideration.

4.41 The policy choices available to the Council will also be informed by how the surplus position at the April 2017 base date is addressed over the 15-year plan period. As previously outlined we have assumed a ‘zero based’ figure in this regard. The NPPF only focuses on a shortfall position by seeking to move forward sites from later in the plan period but does not indicate how a surplus position should be treated. Should the Council seek to take into account the surplus, this would provide some additional headroom in meeting the housing requirement, however the surplus position will
need to be monitored based on future housing delivery. The City Council's submission draft Local Plan has a base date of April 2013.

4.42 As explained earlier, our site categorisation does not take account of all the policy considerations that are relevant in selecting sites for allocation or for the granting of planning permission, which are likely to include the broad sustainability of the development, impact on biodiversity, and strategic transport and other infrastructure capacity issues. Thus, we have not undertaken any analysis to consider whether the theoretical supply from the sites we have assessed are in the right place to meet strategic policy objectives. These are choices to be made through the plan-making process.

4.43 Local Plan allocations have not been taken into account as they had not been published at the April 2017 base date of this SHLAA. Future updates of the SHLAA will therefore take these into account.
5 SUMMARY

Overview

5.1 In October 2017, PBA was commissioned by Liverpool City Council to undertake the 2017 SHLAA Update.

5.2 The SHLAA 2017 database initially considered a total of 1,074 sites, comprising 379 planning permission sites and 695 sites which did not have planning permission, having been identified by the Council from various sources over the years. One site was subsequently removed due to being fully within the Green Belt, leaving a total of 694 sites to be assessed. With regard to NPPF Footnote 11, PBA has not assessed the 379 ‘committed’ SHLAA sites which had planning permission as at April 2017.

5.3 In accordance with the guidance contained within the 2012 NPPF and the PPG, we have assessed whether each identified site is ‘deliverable’ (i.e. available now, suitable and achievable), ‘developable’, or ‘not currently developable’ for housing development over the plan period.

Study Findings

Committed Supply

5.4 Based on Council data as at April 2017, the committed supply predicted to come forward in the 15-year plan period is 21,177 dwellings. From the committed supply, 16,542 dwellings are predicted to come forward in the first five years (between April 2017 and March 2022 as shown in Appendix 2).

5.5 Having regard to this committed supply and taking into account a non-implementation, demolition, and windfall allowances respectively, the Council is able to demonstrate a deliverable five-year supply against both a 5 per cent and 20 per cent NPPF buffer as shown in the table below. This is based on the submitted Local Plan requirement of 1,739 net additional dwellings per annum.

5.6 The level of deliverable five-year housing supply is dependent on how past housing delivery is taken into account. Three scenarios have been considered and these are a ‘zero-based approach’ (where past over delivery of housing is not taken into account), a surplus position starting from 2012 (217 dwellings provided in excess of the requirement), and a surplus position taken from 2013 (1,060 dwellings in excess of the requirement). The three scenarios are detailed further in Table 5.1 below.
Table 5.1 Liverpool’s 5-year housing supply position

<table>
<thead>
<tr>
<th>Component</th>
<th>Zero based approach</th>
<th>2012 Surplus (+217)</th>
<th>2013 Surplus (+1,060)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Dwellings</td>
<td>Dwellings</td>
<td>Dwellings</td>
</tr>
<tr>
<td>A1</td>
<td>5-year Housing Requirement (1739 x 5)</td>
<td>8,695</td>
<td>-</td>
</tr>
<tr>
<td>A2</td>
<td>5-year Housing Requirement (1739 x 5), less surplus</td>
<td>n/a</td>
<td>8,478</td>
</tr>
<tr>
<td>B</td>
<td>5-year Housing Requirement plus 5% NPPF buffer</td>
<td>9,130</td>
<td>8,902</td>
</tr>
<tr>
<td>C</td>
<td>5-year Housing Requirement plus 20% NPPF buffer</td>
<td>10,434</td>
<td>10,174</td>
</tr>
<tr>
<td>D</td>
<td>Committed supply at April 2017 expected to come forward in the 5-year period (April 2017 and April 2022 - see Appendix 2)</td>
<td>16,542</td>
<td>16,542</td>
</tr>
<tr>
<td>E</td>
<td>Windfall Allowance (130 dwellings per annum x 5)</td>
<td>650</td>
<td>650</td>
</tr>
<tr>
<td>F</td>
<td>Non-Implementation allowance (10% of D)</td>
<td>1,654</td>
<td>1,654</td>
</tr>
<tr>
<td>G</td>
<td>Demolition allowance (10 dwellings per annum x 5)</td>
<td>50</td>
<td>50</td>
</tr>
<tr>
<td>H</td>
<td>Total supply as at April 2017 (D+E)-(F+G)</td>
<td>15,488</td>
<td>15,488</td>
</tr>
</tbody>
</table>

Deliverable 5-year supply scenarios

<table>
<thead>
<tr>
<th></th>
<th>Years</th>
<th>Years</th>
<th>Years</th>
</tr>
</thead>
<tbody>
<tr>
<td>I1</td>
<td>5-year supply with 5% NPPF buffer (H/(B/5))</td>
<td>8.48</td>
<td>8.48</td>
</tr>
<tr>
<td>I2</td>
<td>5-year supply with 5% NPPF buffer - less surplus (H/(B/5))</td>
<td>8.48</td>
<td>8.70</td>
</tr>
<tr>
<td>I3</td>
<td>5-year supply with 20% NPPF buffer (H/(C/5))</td>
<td>7.42</td>
<td>7.42</td>
</tr>
<tr>
<td>I4</td>
<td>5-year supply with 20% NPPF buffer - less surplus (H/(C/5))</td>
<td>7.42</td>
<td>7.61</td>
</tr>
</tbody>
</table>

SHLAA Sites without Planning Permission.

5.7 The 694 assessed housing sites which did not have planning permission at April 2017, have been placed into three category bands:

- Sites which perform well against the suitability, availability and achievability assessments, and are therefore affected by the fewest constraints, are considered to be ‘deliverable’ and were therefore placed into Category 1 (potentially can come forward within 0-5 years).

- Sites with a limited level of constraints, such that they are likely to be available for delivery after the first five years, were placed into Category 2 (potentially can come forward in 6-10 years). These ‘developable’ sites may be suitable for development, depending on their individual circumstances and on specific measures being proposed to overcome their constraints within a 6 to 10-year time horizon.

- Sites allocated to Category 3 (potentially can come forward in 11-15 years) are classified as being ‘not currently developable’ and have more significant constraints. For these sites to be considered appropriate for development it would have to be clearly demonstrated that the significant constraints affecting these sites can be mitigated or overcome to make them deliverable or developable.
5.8 The 694 sites without planning permission could potentially provide a total of 19,163 dwellings. Of this theoretical dwelling yield:

- 780 dwellings from 24 sites could be expected to come forward for development in years 1 to 5.
- 6,601 dwellings from 389 sites could be expected to come forward for development in years 6 to 10.
- 11,782 dwellings from 281 sites could be expected to come forward for development in years 11 to 15.

5.9 Outstanding planning commitments together with the inclusion of a windfall allowance and a demolition allowance (after a non-implementation rate has been applied) is sufficient to meet the target for the first five years of 9,130 dwellings (with a 5 per cent buffer applied to the first five-year period) and 10,434 dwellings (with a 20 per cent buffer applied to the first five-year period). This can be done without the need to bring forward any SHLAA sites without planning permission, owing to the significant level of existing commitments. However, this does not preclude them coming forward over the same period as there is an indicative supply of 790 dwellings from Category 1 sites.

**Ten- and 15-Year Assessment Period**

5.10 The assessment’s cumulative approach brings forward the first 5-year housing supply position (with 5 per cent and 20 per cent buffers) into the assessment of the ten and 15-year periods, based on the April 2017 base date and compares that with the remaining requirement using a zero-based approach. It is of course reasonable for Liverpool City Council to take into account the past over provision of housing as shown in Table 5.1 above.

5.11 The 10-year target of 17,607 dwellings (under the 5 per cent ‘buffer’ scenario applied to the first five-year period) can also be fully met based on outstanding planning commitments alone taking into account the application of the 10 per cent non-implementation allowance. However, the 10-year target of 18,260 dwellings (under the 20 per cent ‘buffer’ scenario applied to the first five-year period) cannot be met fully by existing commitments alone and requires the inclusion of the windfall allowance. No Category 1, 2 or 3 sites are required to come forward to meet the 10-year target.

5.12 Liverpool’s 15-year dwelling target is 20,085 dwellings under both a 5 per cent 20 per cent buffer (applied to the first five-year period). The 15-year requirement can be met if all Category 1 sites and significant proportion of Category 2 sites are brought forward. No Category 3 sites are required under either of the 15-year scenarios.

5.13 Given that the maximum 15-year dwelling requirement for Liverpool is 26,085 dwellings (under both the 5 per cent and 20 per cent NPPF buffer scenarios in the first 5-year period), the findings outlined above suggest that the potential yield from the sites identified in the SHLAA, is more than sufficient sites to accommodate that requirement.
5.14 It is likely, however, to be necessary for the City Council to make choices over sites which are not currently suitable due to conflict with local policy designations. For example, a significant proportion of Category 2 sites comprise formal or informal open space, which is an important constraint that may be difficult or undesirable to overcome in many cases. This is ultimately a policy choice to be considered by LCC and is outside of the remit of the SHLAA.

5.15 However, as no Category 3 sites are theoretically required, under any scenario, this provides a degree of ‘headroom’ for choices over which sites can be brought forward. It is also highly likely that additional SHLAA sites will be identified as part of future reviews which will bolster the number of SHLAA sites under consideration.

5.16 Our site categorisation does not take account of all the policy considerations that are relevant in selecting sites for allocation or for the granting of planning permission, which are likely to include the broad sustainability of the development, impact on biodiversity, and strategic transport and other infrastructure capacity issues. Thus, we have not undertaken any analysis to consider whether the theoretical supply from the sites we have assessed are in the right place to meet strategic policy objectives. These are choices to be made through the plan-making process.