Liverpool City Council

Liverpool Strategic Housing Land Availability Assessment 2018
Volume A: Main Report

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EXECUTIVE SUMMARY

PBA, now part of Stantec, has been commissioned by Liverpool City Council (‘LCC’) to undertake an updated Strategic Housing Land Availability Assessment (‘SHLAA’).

The Council has submitted a new Local Plan for Independent Examination 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.

National guidance requires the assessment of housing land supply to be updated annually.

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) describes methodology used for the SHLAA, 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’) was originally published in March 2012 and a revised updated version of the NPPF was published in February 2019. Common to both versions of the NPPF is the focus on significantly boosting 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 2018 is April 2018.

Approach

LCC’s SHLAA database contains a total of 1,067 sites, comprising sites known to the Council (identified through various sources including: extant planning permissions, imminent planning permissions, ‘call for site’ submissions, regeneration strategies and programmes, and lapsed or withdrawn planning applications).
Of the 1,067 sites, as at April 2018, there were a total of 410 ‘committed’ sites, comprising 355 sites with extant planning permission and 55 sites on which planning permission was expected to be granted shortly after the base date (including five sites proposed as Local Plan Site Allocations); and 657 ‘non-planning permission’ sites (including 18 proposed Local Plan Site Allocations).

In accordance with the NPPF and the Planning Practice Guidance (‘PPG’), LCC and PBA have assessed whether the 657 SHLAA sites without planning permission 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).

The result of the 2018 Housing Delivery Test, which was published in February 2019, finds that LCC exceeded its housing requirement between 2015 and 2018, and therefore in accordance with the NPPF a 5 per cent buffer is appropriate. Nevertheless, 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 2018, the committed supply predicted to come forward within the 15-year plan period is 24,674 dwellings. From the committed supply, 12,879 dwellings are predicted to come forward in the first five years (between April 2018 and March 2023 as shown in Appendix 2).

Having regard to this committed supply and taking into account non-implementation and demolition 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 calculation of 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 is not taken into account), a surplus position starting from 2012 (1,226 dwellings provided in excess of the requirement), and a surplus position taken from 2013 (2,069 dwellings 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 (+1,226)</th>
<th>2013 Surplus (+2,069)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Dwellings</td>
<td>Dwellings</td>
<td>Dwellings</td>
</tr>
<tr>
<td>A1 5-year Housing Requirement (1,739 x 5)</td>
<td>8,695</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>A2 5-year Housing Requirement (1,739 x 5), less surplus</td>
<td>n/a</td>
<td>7,469</td>
<td>6,626</td>
</tr>
<tr>
<td>B 5-year Housing Requirement plus 5% NPPF buffer</td>
<td>9,130</td>
<td>7,842</td>
<td>6,957</td>
</tr>
<tr>
<td>C 5-year Housing Requirement plus 20% NPPF buffer</td>
<td>10,434</td>
<td>8,963</td>
<td>7,951</td>
</tr>
<tr>
<td>D Committed supply at April 2018 expected to come forward in the 5-year period (April 2018 and April 2023 - see Appendix 2)</td>
<td>12,879</td>
<td>12,879</td>
<td>12,879</td>
</tr>
<tr>
<td>E Non-Implementation allowance (10% of D)</td>
<td>1,288</td>
<td>1,288</td>
<td>1,288</td>
</tr>
<tr>
<td>F Demolition allowance (10 dwellings per annum x 5)</td>
<td>50</td>
<td>50</td>
<td>50</td>
</tr>
<tr>
<td>G Total supply as at April 2018 D-(E+F)</td>
<td>11,541</td>
<td>11,541</td>
<td>11,541</td>
</tr>
<tr>
<td><strong>Deliverable 5-year supply scenarios</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I1 5-year supply with 5% NPPF buffer (G/(B/5))</td>
<td>6.32</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>I2 5-year supply with 5% NPPF buffer - less surplus (G/(B/5))</td>
<td>-</td>
<td>7.36</td>
<td>8.29</td>
</tr>
<tr>
<td>I3 5-year supply with 20% NPPF buffer (G/(C/5))</td>
<td>5.52</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>I4 5-year supply with 20% NPPF buffer - less surplus (G/(C/5))</td>
<td>-</td>
<td>6.44</td>
<td>7.25</td>
</tr>
</tbody>
</table>

SHLAA Sites without Planning Permission

The 657 assessed housing sites which did not have planning permission at April 2018 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 years 6-10). 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 years 11-15) 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 657 sites without planning permission could potentially yield a total of 17,107 dwellings. Of this theoretical dwelling yield 16,009 dwellings could be expected to come forward within the 15-year study period:

- 780 dwellings could be expected to come forward for development in years 1 to 5;
- 6,615 dwellings could be expected to come forward for development in years 6 to 10; and
- 8,614 dwellings could be expected to come forward for development in years 11 to 15.

The remaining 5,091 dwellings could be expected to come forward for development beyond the 15-year study period.

Outstanding planning commitments (after a non-implementation rate has been applied) are 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 SHLAA sites coming forward over the same period as there is an indicative supply of 780 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 2018 base date.

Both the 10-year target of 17,607 dwellings (under the 5 per cent ‘buffer’ scenario applied to the first five-year period) and the 10-year target of 18,260 dwellings (under the 20 per cent ‘buffer’ scenario applied to the first five-year period) can be fully met based on outstanding planning commitments alone taking into account the application of the ten per cent non-implementation 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 5 per cent and 20 per cent buffer scenarios (applied to the first five-year period). The 15-year requirement can be met if all committed sites come forward alongside a proportion of the windfall allowance for the period.

Given that the maximum 15-year 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, technically, there is no need for any of the SHLAA sites without planning permission to come forward in order to meet the dwelling requirement, as the requirement can be met by existing planning commitments and anticipated windfall sites.

It is likely, however, to be necessary for the City Council to make choices regarding sites which are not currently suitable due to conflict with local policy designations. This is ultimately a policy choice to be considered by LCC and is outside of the remit of the SHLAA. However, as no SHLAA sites without planning permission are
theoretically required, under any scenario, this provides a degree of ‘headroom’ for choices over which sites can be brought forward.

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 PBA, now part of Stantec, has been commissioned by Liverpool City Council (‘LCC’), to undertake the Strategic Housing Land Availability Assessment (‘SHLAA’) 2018. The purpose of the SHLAA is to update the 2017 version of the study which was also prepared by PBA.

1.2 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.

1.3 LCC is at an advanced stage of preparation of a new City-wide development plan, known as the ‘Liverpool Local Plan 2013-2033’, which was submitted to the Secretary of State in May 2018 and is currently the subject of independent examination. 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).

1.4 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.

1.5 The SHLAA is consistent with the National Planning Policy Framework (‘NPPF’) of February 2019 and the associated Planning Practice Guidance (‘PPG’) – in particular the section on the assessment of land availability. The NPPF states that local planning authorities (LPAs) should have a clear understanding of the land available in their area to meet their housing requirement and should identify and annually update a specific supply of deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement.

1.6 This SHLAA 2018 Update considers a total of 1,067 sites, of which there are a total of 410 ‘committed’ sites, comprising 355 sites with extant planning permission and 55 sites on which planning permission was expected to be granted shortly after the base date (including five sites proposed as Local Plan Site Allocations). The remaining 657 sites are known to the Council as sites for potential residential development (many of which having been identified via previous ‘call for site’ consultations) and they include 18 sites proposed as Site Allocations within the emerging Local Plan.

1.7 In reviewing the sites with planning permission, the assessment adopts the NPPF’s recommended approach in assuming that the ‘committed’ sites are deliverable, subject to the application of a non-implementation allowance, and therefore focusses...
on the consideration of the 657 sites without planning permission in respect of suitability, availability, and achievability.

1.8 In accordance with the NPPF and the PPG, LCC and PBA have assessed whether each identified (non-planning permission) site should be placed within Category 1, that is, ‘deliverable’ (i.e. available now, suitable and achievable), Category 2 (‘developable’), or Category 3 (‘not currently developable’) for housing development over the plan period. We expand upon these definitions in Section 3.

Structure of Our Report

1.9 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.

1.10 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 note in relation to delivery profile assumptions 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 of relevant national guidance and local planning policy as well as key supporting evidence, to provide the context for the 2018 SHLAA.

2.2 The 2018 SHLAA is taking place during a period when local planning policy is evolving. The Council submitted its Local Plan to the Secretary of State for Housing, Communities and Local Government for examination in May 2018 and national planning policy and guidance is evolving, which we reflect below.

National Planning Policy and Guidance

National Planning Policy Framework

2.3 The ‘NPPF’ was originally published in March 2012, updated in July 2018 and a revised updated version of the NPPF was published by the Ministry of Housing, Communities and Local Government (‘MHCLG’) in February 2019. Whilst we recognise that the Local Plan which has been submitted for examination is being considered under the original version of the NPPF, in order to ensure that this SHLAA is consistent with the latest policy guidance, this sub-section summarises the relevant matters outlined in the revised updated NPPF (2019).

Achieving Sustainable Development

2.4 The thrust of the revised NPPF (2019) is largely similar to the original version published in March 2012, with paragraph 7 of the revised NPPF affirming that the purpose of the planning system is to contribute to the achievement of sustainable development.

2.5 Paragraph 8 of the NPPF (2019) outlines that there are three independent objectives to sustainable development: economic, social and environmental. We do not consider it worthwhile repeating in full what the NPPF says in relation to each objective, but we highlight that, under the social objective heading, the NPPF states that there is a need to ensure a sufficient number and range of homes ‘to support strong, vibrant and healthy communities’.

Delivering a Sufficient Supply of Homes

2.6 Paragraph 59 of the NPPF (2019) advises that, in order to significantly boost the supply of housing, it is important a sufficient amount and a variety of land should come forward where it is needed, to meet the needs of groups with specific requirements and developed without necessary delay.

2.7 Paragraph 60 requires strategic policies to be informed by a local housing need assessment to determine the minimum number of houses needed. The local housing needs assessment should be calculated using the standard method set out in national planning guidance, unless exceptional circumstances justify an alternative approach.
Paragraph 61 of the NPPF (2019) goes on to advocate the delivery of housing of appropriate sizes, types and tenures which is capable of meeting the needs of different community groups.

Paragraph 67 of the NPPF (2019) sets the requirement for strategic policy-making authorities to have a clear understanding of land available in their area through the preparation of a SHLAA. Further to this, paragraph 67 outlines how planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Paragraph 67 goes on to require planning policies to identify a supply of:

- specific, deliverable sites for the first five years of the plan period¹; and
- specific, deliverable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

The glossary which is contained within Annex 2 to the NPPF (2019) offers a definition of the term ‘deliverable’:

‘To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

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

Paragraph 70 advises that where an allowance is to be made for windfall sites as part of the anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends.

Paragraph 73 goes on to require local planning authorities (‘LPAs’) to identify and update annually a supply of specific delivery sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement, in addition to an appropriate buffer of:

¹ With an appropriate buffer, as set out in paragraph 73 of the NPPF.
- 5 per cent to ensure choice and competition in the market for land; or
- 10 per cent where the LPA wishes to demonstrate a five-year supply of deliverable sites through and annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
- 20 per cent where there has been significant under-delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.

### Making Effective Use of Land

2.13 Paragraph 117 of the NPPF (2019) states that planning policies and decisions should promote the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 117 goes on to encourage strategic policies to maximise the re-use of land which has been previously developed (brownfield land).

2.14 Paragraph 118 states that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and promote and support the development of under-utilised land and buildings, especially if this would help meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

2.15 Paragraph 120 reflects the need for planning policies to be informed by regular review of both the land allocated for development in plans, and of land availability, in order to reflect changes in the demand for land.

### Planning Practice Guidance

2.16 On 6 March 2014, the Department of Communities and Local Government (‘DCLG’) as it was called at the time, launched the online Planning Practice Guidance (‘PPG’) to provide additional guidance on a range of topics, including land availability assessments. The PPG advises that the assessment of land availability should identify a future supply of land which is suitable, available and achievable for housing development uses over the plan period. The guidance regarding land availability assessments was partially updated on 13 September 2018.

2.17 The PPG advises that an assessment of land availability is an important step in the preparation of Local Plans. 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).

**Figure 2.1 PPG Assessment Methodology Flow Chart**

![PPG Assessment Methodology Flow Chart](image)

Source: Planning Practice Guidance

2.20 The advice relating to Stage 1 identifies that the area selected for the assessment should be the housing market area. The PPG states that this 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 capable of delivering five or more dwellings and above, although where appropriate, alternative site size thresholds should be considered. 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 As part of Stage 3, a windfall allowance may be justified in determining housing potential if a local planning authority has compelling evidence. 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 Under Stage 4, 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 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 Although guidance in relation to what Stage 5 involves has been removed from the PPG, the final stage is retained within the flow chart methodology reproduced at Figure 2.1 above. Stage 5 involves the collation of the final evidence base, which comprises 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.

2.25 The PPG advises that authorities can use evidence such as a SHLAA to identify sites which may be suitable, available and achievable for development and that SHLAAs can also provide some evidence as to their deliverability.

**Current and Emerging Local Plan Policy**

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

2.26 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.

2.27 The UDP is not up to date with respect to housing land supply and allocations, having an original plan period of 1986-2001 and therefore is afforded limited weight due to its age and level of consistency with national planning policy.
2.28 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.

2.29 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.’

2.30 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.

2.31 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.

2.32 In relation to the assessment of housing land supply, the relevant emerging Local Plan policies are Policy H1 and Policy H2. 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.
2.33 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.

2.34 In addition, there are a number of Housing and City Centre policies, as set out below.

2.35 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.

2.36 Policy H4 (‘Older Persons Housing’) supports various forms of supported, independent and retirement accommodation.

2.37 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.

2.38 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.

2.39 Policy H9 (‘Vacant Housing, Refurbishment/Extensions, and Housing Renewal’) includes a section on housing renewals, which states that planning permission will be granted for large-scale refurbishment/development proposals which are set out in a masterplan or framework document.

2.40 Policy H10 (‘Conversion of Dwellings and Buildings’) states that planning permission will be granted for the conversion of existing dwellings/buildings into self-contained flats, studio apartments/bedsits and HMOs, provided it meets the criteria outlined within the policy.

2.41 Chapter 6 of the emerging Local Plan outlines the vision for Liverpool City Centre and a number of strategic priorities to help the Local Plan to achieve the vision. Included within the section entitled ‘City Centre Wide Priorities’ is the requirement to focus on ensuring a diverse, high quality residential offer that meets the needs of a diverse community; and to protect areas of existing family housing and ensure sustainable, well connected, inclusive and high quality distinctive residential neighbourhoods.

2.42 Policy CC24 (‘Housing Provision in the City Centre’) outlines the criteria which proposals for residential development in the City Centre are required to meet for planning permission to be granted.

2.43 The evidence base supporting the production of the Liverpool Local Plan has been updated in response to the publication of recent household and projections, as set out within the Liverpool Strategic Housing Market Assessment (‘SHMA’) 2016 and
the Liverpool City Region Strategic Housing and Employment Land Market Assessment (‘SHELMA’) 2018.

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 is identified.

2.46 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 and Employment Land Market Assessment (SHELMA)

2.47 A SHELMA undertaken on behalf of the Liverpool City Region (‘LCR’) authorities was completed in 2018 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 are 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.

Taking account of all of the factors considered, the 2018 SHELMA identifies an Objectively Assessed Need (‘OAN’) of 1,739 dpa for the Liverpool City Council administrative area.

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)

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.

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 2018 SHLAA base date has been one of increasing provision since the low point due to the 2007 ‘credit-crunch’ and subsequent economic volatility between 2008-2012. Table 2.1 below presents gross and net housing delivery between 2012 and 2018.
Table 2.1 Housing Delivery Since 2012 - Liverpool

<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>2017/2018</td>
<td>2,794</td>
<td>46</td>
<td>2,748</td>
<td>1,739</td>
<td>1,009</td>
</tr>
<tr>
<td>Total 2012-2018</td>
<td>12,694</td>
<td>1,034</td>
<td>11,660</td>
<td>10,434</td>
<td>1,226</td>
</tr>
<tr>
<td>Total 2013-2018</td>
<td>11,457</td>
<td>693</td>
<td>10,764</td>
<td>8,695</td>
<td>2,069</td>
</tr>
</tbody>
</table>

2.57 As is evident from Table 2.1, housing delivery has notably increased in recent years with significant delivery achieved between 2015 and 2018. This contrasts with lower housing delivery between 2012 and 2015, when gradual recovery from the recession is evident.

2.58 The increase in housing delivery has been recognised by the results of the 2018 Housing Delivery Test (‘HDT’), which was published by MHCLG in February 2019. The HDT finds that Liverpool’s housing delivery was 193 per cent of its requirement between 2015 and 2018.

2.59 Table 2.1 also sets out the cumulative provision of housing between 2012 and 2018 (reflecting the SHELMA base date of 2012) and 2013 to 2018 (reflecting the emerging Local Plan base date of 2013). Cumulative housing provision in both cases results in a surplus position of:

- 1,226 dwellings between 2012 and 2018; and
- 2,069 dwellings between 2013 and 2018.

2.60 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.

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2 Based on the SHELMA OAN figure for Liverpool of 1,739 dwellings, base dated to 2012.
3 STUDY METHODOLOGY

3.1 As we explained in Section 2, the PPG provides details on the methodology for undertaking a SHLAA.

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. The SHLAA 2018 assessment is an update and builds on the work undertaken for the previous SHLAA 2017 (which has a base date of April 2017).

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.

3.6 The sites database at April 2018 contains a total of 1,067 sites, of which there are:

- 410 ‘committed’ sites with extant planning permission or where planning permission is expected to be granted imminently after the base date\(^3\) (Appendix 4); and
- 657 sites without planning permission, which have been appraised as part of this study (Appendix 5).

3.7 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.

3.8 The majority of sites contained within the current assessment are those previously assessed jointly by the Council and PBA in the 2017 SHLAA. The 2018 SHLAA also includes some 17 additional sites which have recently been submitted to the Council and identified for assessment as well as 13 sites which benefited from planning

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\(^3\) With a resolution to approve subject to the completion of a Section 106 legal agreement

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permission at the time of the previous assessment base date (April 2017) for which planning permission has subsequently lapsed, and so therefore the sites have been assessed in this latest study. A total of 657 sites have therefore been appraised as part of this SHLAA study.

3.9 LCC and PBA have jointly assessed the suitability and availability of the 657 sites within the SHLAA database, through a combination of desk-based research and site visits, and PBA has assessed the achievability assessments of the sites. The 410 ‘committed’ SHLAA sites have not been assessed, for the reasons given earlier.

3.10 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.

3.11 The reasons for excluding sites that are fully within the Green Belt are as follows:
- Green Belt is 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.

3.12 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 and therefore falls outside of the full 15-year plan period.

Survey of Identified Additional Sites

3.13 As noted above, the Council/PBA recorded site characteristics and various other information for each of the 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;

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4 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.
details of any obvious physical constraints in relation to site access, drainage, ground conditions, and so on;
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.

3.14 The suitability and availability of the SHLAA sites has been conducted based on the principles outlined above. PBA has assessed the achievability of all sites 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.

3.15 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.

3.16 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

3.17 The approach to site assessment, covering suitability, availability and achievability, is dependent on whether the site is a ‘commitment’\(^5\) or is a potential site that the City Council is aware of but which does not have planning permission.

3.18 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.

\(^5\) Comprising extant planning permissions and imminent planning permissions.
3.19 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

3.20 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.

3.21 If a site is affected by 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.

3.22 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).

3.23 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.

3.24 The individual suitability scores for each assessed site are shown in Appendix 6.

### Availability

3.25 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.

3.26 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)

3.27 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 3 (site faces significant constraints).

3.28 The individual availability scores for each assessed site are shown in Appendix 7.

### Achievability – Viability Appraisal

3.29 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.

3.30 However, for a robust assessment, LCC requested a multi-step approach to the assessment of achievability, which we detail below. The assessment was undertaken
by AP Sheehan & Co Ltd (‘APS’) as part of the 2017 SHLAA and as housing market economic conditions which underpin viability appraisal assumptions have remained unchanged, PBA has followed the same approach for the assessment of additional sites in this current SHLAA.

3.31 Allied to the staged approach detailed below, various housing market issues affecting Liverpool at both the macro and micro levels have been considered, 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**

3.32 As stated above, the viability appraisal work undertaken for the 2017 SHLAA remains relevant to the 2018 assessment in order to establish the achievability of both sites brought forward from the 2017 assessment and new sites assessed in the 2018 SHLAA. Step 1 (1a & 1b) and Step 2 of the achievability assessments undertaken for the 2017 SHLAA are briefly outlined as follows.

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 professional opinion, housing market evidence 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.
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 explained earlier in our report, 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\(^6\), 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\(^7\). 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 As part of the 2017 SHLAA, 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 8, whilst the detailed achievability appraisals are shown in Appendix 9. Given the relatively short period of time since the 2017 SHLAA, it was considered that the appraisals undertaken as part of the 2017 assessment are still relevant to this current study.

**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 a 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 ‘SHLAA Assessment Criteria Note’ (reproduced in Appendix 1).

\(^6\) Based on the professional knowledge of APS and discussions with agents rather than undertaking detailed site appraisals.

\(^7\) This has not been possible in the City Sub-Area due to the lack of available greenfield sites.
3.39 Based on the approach outlined 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.
- **Band 3** – Poor marketability and/or viability. Site faces significant achievability constraints and is unlikely to be achievable within the first ten years.

**Overall Categorisation (Suitability, Availability, Achievability)**

3.40 As explained in Appendix 1, 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 – years 6-10).
- 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</th>
<th>Permuation of Scores</th>
<th>Criteria Verdicts (1-3)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Suitability Criteria Verdict</td>
</tr>
<tr>
<td>Category 1 – Deliverable Sites</td>
<td>A</td>
<td>1</td>
</tr>
<tr>
<td>Category 2 – Developable Sites</td>
<td>B</td>
<td>1</td>
</tr>
<tr>
<td>Category 3 – Not Currently Developable Sites</td>
<td>C</td>
<td>2</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:

### 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.

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

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8 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.
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 not specifically identified in the development plan’. 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 been adopted in November 2002. Therefore, in the absence of an up-to-date plan, there will inevitably be a significantly higher proportion of windfalls coming forward given that UDP allocations will have been largely developed out and no new allocations will have been identified in an adopted, successor development plan. Accordingly, this does not represent a ‘normal’ position for the assessment of windfall contributions over the next 15-year period.

3.51 Against the background outlined above, LCC’s approach is to count sites that come forward as ‘windfall’ where they have not been previously identified within the schedule of sites contained in the most recent SHLAA prior to the permission being granted. Effectively, the SHLAA sites schedules provide the baseline to identify sites in lieu of an up-to-date adopted Local Plan containing yet-to-be developed site allocations and sites not previously identified (in the SHLAA). Such sites are considered by LCC as ‘windfalls’. This is an interim measure until LCC adopts a new Local Plan.

3.52 The adoption of the new Local Plan with identified land for housing will then provide an up-to-date basis on which to judge windfall delivery in accordance with the NPPF definition.

3.53 The Submission Draft Local Plan assumes a windfall figure of 130 dpa, which is 50 per cent of the annual average figure delivered over the 2013 to 2016 period (260 dpa). It is our understanding that, having undertaken further analysis of the supply coming forward through planning permission between 2013 and 2018, the City Council has recalculated the level of provision from sites that were not identified in the SHLAA’s current when permission was granted. LCC will include this revised figure in its response to the Local Plan Inspector’s initial questions and comments.

3.54 For the purposes of this SHLAA – and based on LCC’s alternative approach to defining windfalls as described above – we have included in our calculations a windfall assumption based on the Council’s revised figure of 709 dpa, which is 50 per cent of the annual average figure granted planning permission over the 2013 to 2018 period (1,419 dpa). We also note that the Local Plan Inspector has questioned the inclusion of a windfall allowance in the first five years of the plan-period. In view of this we have profiled the windfall supply from Year 6 onwards.
3.55 Future reviews of the SHLAA will need to review the windfall assumption to ensure its appropriateness, particularly as the Local Plan is taken forward.

**Stage 4 – Assessment Review**

**Time Horizon and Study Base Date**

3.56 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.

3.57 Paragraph 67 of the NPPF requires LPAs to identify a supply of:

a) specific, deliverable sites for years one to five of the plan period9; and
b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

3.58 Each assessment 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.

3.59 We consider that 1 April 2018 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 2018 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 2018 to 2023 (first five years), 2018 to 2028 (ten years) and 2018 to 2033 (15 years).

3.60 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.

**Stage 5 – Final Evidence Base**

**Site Categorisation**

3.61 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.

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9 With an appropriate buffer, as set out at NPPF paragraph 73.
Through our assessments of suitability, availability and achievability, each site was placed into one of three ‘Category’ bands, 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.

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. Appendix 7 presents a table containing assessed housing sites and their categorisation scoring.

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.

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 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.

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10 Our definitions match those specified in footnotes 11 and 12 on page 12 of the NPPF.
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 2018 SHELMA, based on the 2014-based household projections, identifies a requirement for 1,739 net additional dwellings per annum for Liverpool, which has been taken forward in the emerging Local Plan. The latest updates to the PPG published in February 2019 confirm that the 2014-based household projections should be used as the basis for calculating local housing need. 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 2018 and 2033).

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.

Shortfall / Surplus Position

4.6 Between 2012 and 2018 (beginning from the SHELMA base date), from which the dwelling target of 1,739 dpa has been derived, 11,660 net additional dwellings were delivered. This equates to an excess of 1,226 dwellings over the SHELMA target of 10,434 dwellings (1,739 dwellings x 6 years).
4.7 Between 2013 and 2017 (coinciding with the submitted Local Plan base date), 10,764 net additional dwellings were delivered against a target of 8,695 dwellings (based on the SHELMA target of 1,739 dwellings multiplied by 5 years). This equates to a more substantial surplus of 2,069 dwellings over that period.

4.8 As shown in Table 4.1, for both the preceding 6-year (2012-2018) and 5-year (2013-2018) periods there is a surplus position due to substantially increased levels of completions in the period between 2015 and 2018. Therefore, no accrued shortfall exists when judged against the dwelling target to be taken into account at the 2018 base date.

**Table 4.1 Shortfall or Surplus in Housing Delivery (2012 to 2018)**

<table>
<thead>
<tr>
<th>Shortfall or Surplus (2012 - 2018)</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 2018 (1,739 x 6)</td>
<td>10,434 dwellings</td>
</tr>
<tr>
<td><strong>Surplus 2012 to 2018 (11,660 minus 10,434)</strong></td>
<td><strong>1,226 dwellings</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Shortfall or Surplus (2013 - 2018)</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 2018 (1,739 x 5)</td>
<td>8,695 dwellings</td>
</tr>
<tr>
<td>Net Completions (2013 – 2018)</td>
<td>10,764 dwellings</td>
</tr>
<tr>
<td><strong>Surplus 2013 to 2018 (10,764 minus 8,695)</strong></td>
<td><strong>2,069 dwellings</strong></td>
</tr>
</tbody>
</table>

| Zero-based figure 2012-2018 utilised in this report | 0 dwellings |

4.9 Rather than subtract the overprovision of either 2,069 or 1,226 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 number 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 result of the 2018 HDT finds that LCC has exceeded its housing requirement between 2015 and 2018 and therefore in accordance with the NPPF a 5 per cent buffer is appropriate. Nonetheless, as a worst-case scenario, we test both a 5 per cent and 20 per cent NPPF buffer figure in Tables 4.2 and 4.3, respectively.\(^\text{11}\)

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\(^{11}\) Whilst the July 2018 NPPF and subsequent February 2019 NPPF revision has introduced the concept of a 10 per cent buffer, as LCC is not currently proposing to prepare an annual position statement or does not have a ‘recently adopted plan’ as per NPPF paragraph 73, we have not applied a 10 per cent buffer to our assessment. Nonetheless, the application of a 20 per cent buffer should be considered as a worst-case scenario.
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 73 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**

4.12 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**

4.13 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. As evidenced by the results of the 2018 HDT whilst it is clear that LCC has not significantly under-delivered against the relevant housing requirement figure for the past three years, 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).

4.14 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.

4.15 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: 50 per cent of additional ‘buffer’ requirement has been removed as part of the calculation for the 10 year requirement, whilst the other 50 per cent has been removed as part of the calculation for the 15 year requirement, to account for the inclusion of the NPPF ‘buffer’ within the first five year period. 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.
4.16 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 annual requirement of 1,739 dwellings. As specified in Table 4.1, the current overprovision equates to either 1,226 dwellings (between 2012 and 2018 base date) or 2,069 dwellings (between 2013 and 2018). 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 (2018 to 2023) with 5% NPPF ‘Buffer’**

<table>
<thead>
<tr>
<th>Five-Year Housing Requirement plus NPPF buffer (2018 - 2023)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Basic Five-Year Requirement (1,739 x 5)</td>
<td>8,695 dwellings</td>
</tr>
<tr>
<td>Add 5% ‘buffer’</td>
<td>435 dwellings</td>
</tr>
<tr>
<td><strong>Total Five-Year Requirement including 5% NPPF ‘Buffer’</strong></td>
<td><strong>9,130 dwellings</strong></td>
</tr>
</tbody>
</table>

**Table 4.3 Five-Year Housing Requirement (2018 to 2023) with 20% NPPF ‘Buffer’**

<table>
<thead>
<tr>
<th>Five-Year Housing Requirement plus NPPF buffer (2018 - 2023)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Basic Five-Year Requirement (1,739 x 5)</td>
<td>8,695 dwellings</td>
</tr>
<tr>
<td>Add 20% ‘buffer’</td>
<td>1,739 dwellings</td>
</tr>
<tr>
<td><strong>Total Five-Year Requirement including 20% NPPF ‘Buffer’</strong></td>
<td><strong>10,434 dwellings</strong></td>
</tr>
</tbody>
</table>

**Table 4.4 Ten-Year Housing Requirement (2018 to 2028) adjusted for 5% NPPF ‘Buffer’ applied to first 5-year period**

<table>
<thead>
<tr>
<th>Ten-Year Housing Requirement plus initial NPPF buffer (2018 - 2028)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Five-Year Requirement and 5% NPPF ‘Buffer’</td>
<td>9,130 dwellings</td>
</tr>
<tr>
<td>Add Second Five-Year Requirement</td>
<td>8,695 dwellings</td>
</tr>
<tr>
<td><strong>Minus 50% of first five-year NPPF buffer</strong></td>
<td><strong>-218 dwellings</strong></td>
</tr>
<tr>
<td><strong>Ten-Year Requirement</strong></td>
<td><strong>17,607 dwellings</strong></td>
</tr>
</tbody>
</table>
### Table 4.5 Ten-Year Housing Requirement (2018 to 2028) adjusted for 20% NPPF ‘Buffer’ applied to first 5-year period

<table>
<thead>
<tr>
<th>Ten-Year Housing Requirement plus initial NPPF buffer (2018 - 2028)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Five-Year Requirement and 20% NPPF ‘Buffer’</td>
<td>10,434 dwellings</td>
</tr>
<tr>
<td>Add Second Five-Year Requirement</td>
<td>8,695 dwellings</td>
</tr>
<tr>
<td>Minus 50% of first five-year NPPF buffer</td>
<td>-869 dwellings</td>
</tr>
<tr>
<td><strong>Ten-Year Requirement</strong></td>
<td><strong>18,260 dwellings</strong></td>
</tr>
</tbody>
</table>

### Table 4.6 15-Year Housing Requirement (2018 to 2033) adjusted for 5% NPPF ‘Buffer’ applied to first 5-year period

<table>
<thead>
<tr>
<th>15-Year Housing Requirement (2018 - 2033)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Ten-Year Requirement 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><strong>15-Year Requirement</strong></td>
<td><strong>26,085 dwellings</strong></td>
</tr>
</tbody>
</table>

### Table 4.7 15-Year Housing Requirement (2018 to 2033) adjusted for 20% NPPF ‘Buffer’ applied to first 5-year period

<table>
<thead>
<tr>
<th>15-Year Housing Requirement (2018 - 2033)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Ten-Year Requirement 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><strong>15-Year Requirement</strong></td>
<td><strong>26,085 dwellings</strong></td>
</tr>
</tbody>
</table>

### Housing Commitments and Site Allocations

4.17 The data provided by the Council indicate that there was a substantial supply, at April 2018, of 29,765 dwellings, from 410 ‘committed’ sites, comprising 355 sites with extant planning permission, 55 sites on which planning permission was expected to be granted imminently after the base date (with a resolution to approve subject to the completion of a Section 106 legal agreement), including five emerging Local Plan Site Allocations.

4.18 LCC has undertaken a delivery profile assessment for each of the committed sites, whereby an assumption has been applied in relation to likely delivery of each of the 410 sites based on figures provided by the developer directly, development progress of the site, and lead-times and build-out rates. A note which sets out LCC’s approach to deliverability profile assumptions, with reference to lead-in period times and build out rates, is contained within Appendix 3.

4.19 The delivery profile includes a small number of substantial planning permissions which are not predicted to be fully delivered within the study period and are phased as 15 year plus.

4.20 Taking commitments into account, as at April 2018 the supply projected to come forward within the 15-year plan period is 24,674 dwellings. The figure of 24,674
dwellings represents LCC’s judgement on the ‘deliverability’ of the sites in accordance with the latest revisions contained with the NPPF and the PPG, taking into account the burden of evidence required to support deliverability as clarified by recent appeal decisions and High Court judgements.

4.21 Part of the committed supply comprises varying forms of student accommodation, older persons’ housing and supported living accommodation. The Housing Delivery Test Measurement Rule Book\textsuperscript{12} sets out how adjustments are to be applied to account for supply student and other communal accommodation, and thus it is appropriate to account for these forms of 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 to apply a ‘market release’ factor is set out in the deliverability profile assumptions note within Appendix 3.

4.22 As explained in Section 3, we have allowed for a windfall contribution of 709 dwellings per annum to come forward from Year 6 onwards, equating to a total of 7,090 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.

4.23 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.

4.24 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.

4.25 A breakdown of the supply from commitment is provided within Tables 4.8 to 4.10 below.

**Table 4.8 First Five-Year Housing Commitments (2018-2023)**

<table>
<thead>
<tr>
<th>Housing Commitments (2018 - 2023)</th>
<th>12,879 dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td>City-wide Commitments (2018 - 2023)</td>
<td>- 1,288 dwellings</td>
</tr>
<tr>
<td><strong>Net Housing Commitments</strong></td>
<td><strong>11,591 dwellings</strong></td>
</tr>
</tbody>
</table>

**Table 4.9 First Ten-Year Housing Commitments (2018-2023)**

<table>
<thead>
<tr>
<th>Housing Commitments (2018 - 2028)</th>
<th>12,879 dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td>City-wide Commitments (2018 - 2023)</td>
<td>- 2,251 dwellings</td>
</tr>
<tr>
<td>City-wide Commitments (2023 - 2028)</td>
<td>9,628 dwellings</td>
</tr>
<tr>
<td><strong>Net Housing Commitments</strong></td>
<td><strong>20,256 dwellings</strong></td>
</tr>
</tbody>
</table>

\textsuperscript{12} Ministry of Housing, Communities & Local Government, July 2018
Table 4.10 15-Year Housing Commitments

<table>
<thead>
<tr>
<th>Housing Commitments (2018 - 2033)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>City-wide Commitments (2018 - 2023)</td>
<td>12,879 dwellings</td>
</tr>
<tr>
<td>City-wide Commitments (2023 - 2028)</td>
<td>9,628 dwellings</td>
</tr>
<tr>
<td>City-wide Commitments (2023 - 2028)</td>
<td>2,167 dwellings</td>
</tr>
<tr>
<td>Apply 10% 'non-implementation'</td>
<td>- 2,467 dwellings</td>
</tr>
<tr>
<td>Net Housing Commitments</td>
<td>22,207 dwellings</td>
</tr>
</tbody>
</table>

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

**Theoretical Dwelling Supply – Sites Without Planning Permission**

4.27 We have identified the theoretical dwelling supply from the 657 sites in the SHLAA which do not have planning permission, and which have been assessed to be suitable, available and achievable and have 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 assessed sites see Appendix 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.

4.28 Table 4.11 below summarises the theoretical dwelling supply from SHLAA sites, broken down by Category band and land designation status:

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13 Where the site is a mixed previously developed and greenfield site, it has been assumed that the site is greenfield for the purposes of this assessment.
Table 4.11 Summary of Supply from SHLAA sites without Planning Permission

<table>
<thead>
<tr>
<th>Category</th>
<th>Number of Sites</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>21</td>
<td>329</td>
<td>131</td>
<td>481</td>
</tr>
<tr>
<td>Previously Developed</td>
<td>Area (ha)</td>
<td>14.5</td>
<td>91.3</td>
<td>119.5</td>
<td>225.3</td>
</tr>
<tr>
<td></td>
<td>Yield</td>
<td>780</td>
<td>6,495</td>
<td>5,673</td>
<td>12,948</td>
</tr>
<tr>
<td>Greenfield</td>
<td>Number of Sites</td>
<td>0</td>
<td>50</td>
<td>126</td>
<td>176</td>
</tr>
<tr>
<td></td>
<td>Area (ha)</td>
<td>0.0</td>
<td>20.9</td>
<td>117.9</td>
<td>138.7</td>
</tr>
<tr>
<td></td>
<td>Yield</td>
<td>0</td>
<td>597</td>
<td>3,563</td>
<td>4,160</td>
</tr>
<tr>
<td>Total</td>
<td>Number of Sites</td>
<td>21</td>
<td>379</td>
<td>257</td>
<td>657</td>
</tr>
<tr>
<td></td>
<td>Area (ha)</td>
<td>14.5</td>
<td>112.2</td>
<td>237.4</td>
<td>364.1</td>
</tr>
<tr>
<td></td>
<td>Yield</td>
<td>780</td>
<td>7,091</td>
<td>9,236</td>
<td>17,107</td>
</tr>
</tbody>
</table>

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

4.29 From the table above, it can be seen that:

- The 657 housing sites could potentially yield around 17,107 dwellings.
- Of this theoretical capacity, 780 units are from 21 sites assessed as being ‘deliverable’ (i.e. Category 1), with a further 7,091 dwellings from 379 ‘developable’ sites (Category 2) and 9,236 units from 257 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 12,948 dwellings, of which 780 dwellings could come forward in the first five-year period (Category 1). Beyond this, 6,495 units have been identified from ‘developable’ PDL sites (Category 2), and 5,673 units are derived from PDL sites which are not currently developable (Category 3).
- Greenfield sites could theoretically deliver 4,160 dwellings, of which 0 dwellings could come forward in the first five-year period (Category 1). Beyond this, 597 units have been identified from ‘developable’ greenfield sites (Category 2), and 3,563 units are derived from greenfield sites which are not currently developable (Category 3).

4.30 The 657 sites without planning permission could potentially yield a total of 17,107 dwellings. Of this theoretical dwelling yield, 16,009 dwellings could be expected to come forward within the 15-year study period:

- 780 dwellings could be expected to come forward for development within years 1 to 5;
- 6,615 dwellings could be expected to come forward for development within years 6 to 10; and
- 8,614 dwellings could be expected to come forward for development within years 11 to 15.
4.31 The remaining 5,091 dwellings could be expected to come forward for development beyond the 15-year study period.

Adequacy of Housing Provision

4.32 In Tables 4.12 and 4.13 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 657 housing sites without planning permission.

Approach

4.33 The components of potential housing supply, as set out in Tables 4.12 and 4.13 below, are referenced as follows:

- PC (‘Planning Commitments’) = sites with extant planning permission or imminent planning permission;
- DA (‘Demolition Allowance’) = a demolition allowance of 50 dwellings has been applied in the years 1-5, years 6-10 and years 11-15 assessment periods (as described earlier in this section);
- WF/DA (‘Windfall and Demolition Allowance’) = a windfall and demolition allowance of 3,495 dwellings has been applied in each of the years 6-10 and years 11-15 assessment periods, which comprises a 3,545-dwelling windfall allowance minus a 50-dwelling demolition allowance for each five-year period (as described above); and
- C1, C2, C3 (‘Category’ bands 1, 2 and 3) = potential from the 657 housing sites in the SHLAA in the years 1-5, years 6-10 and years 11-15 assessment periods (as set out in Appendix 2).

4.34 As there is no certainty that a single source of potential housing supply will address LCC’s housing requirement for a given 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.

4.35 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.

4.36 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 4.12 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>11,591</td>
</tr>
<tr>
<td></td>
<td>PC - DA</td>
<td>11,541</td>
</tr>
<tr>
<td></td>
<td>PC - DA + C1</td>
<td>12,321</td>
</tr>
<tr>
<td></td>
<td>PC - DA + C1 + C2</td>
<td>18,936</td>
</tr>
<tr>
<td></td>
<td>PC - DA + C1 + C2 + C3</td>
<td>27,550</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 + WF/DA</td>
<td>20,256</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1</td>
<td>24,531</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2</td>
<td>31,146</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2 + C3</td>
<td>39,760</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 + WF/DA</td>
<td>22,207</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1</td>
<td>29,197</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2</td>
<td>29,977</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2 + C3</td>
<td>36,592</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2 + C3</td>
<td>45,206</td>
</tr>
<tr>
<td></td>
<td><strong>Dwelling Requirement</strong></td>
<td><strong>26,085</strong></td>
</tr>
</tbody>
</table>

### Table 4.13 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>11,591</td>
</tr>
<tr>
<td></td>
<td>PC + DA</td>
<td>11,541</td>
</tr>
<tr>
<td></td>
<td>PC + DA + C1</td>
<td>12,321</td>
</tr>
<tr>
<td></td>
<td>PC + DA + C1 + C2</td>
<td>18,936</td>
</tr>
<tr>
<td></td>
<td>PC + DA + C1 + C2 + C3</td>
<td>27,550</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 + WF/DA</td>
<td>20,256</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1</td>
<td>23,751</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2</td>
<td>24,531</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2 + C3</td>
<td>31,146</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2 + C3</td>
<td>39,760</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 + WF/DA</td>
<td>22,207</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1</td>
<td>29,197</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2</td>
<td>29,977</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2 + C3</td>
<td>36,592</td>
</tr>
<tr>
<td></td>
<td>PC + WF/DA + C1 + C2 + C3</td>
<td>45,206</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

4.37 Taking the ‘zero-based’ figure in relation to past housing delivery used in this assessment, Tables 4.12 and 4.13 confirm that committed sites (including extant and imminent planning permissions, after a non-implementation rate discussed earlier in this section has been applied) are 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).

4.38 This can be done without the need to bring 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 is an indicative supply of 780 dwellings from Category 1 sites. Should either of the 2012-2018 or 2013-2018 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. LCC will take forward its preferred approach as part of the examination of the Local Plan.

Ten-Year and 15-Year Assessment Periods

4.39 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 2018 base date.

4.40 Both the 10-year target of 17,607 dwellings (under the 5 per cent ‘buffer’ scenario applied to the first five-year period) and the 10-year target of 18,260 dwellings (under the 20 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. No windfall sites, Category 1, 2 or 3 sites are required to come forward to meet the 10-year target.

4.41 Tables 4.12 and 4.13 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 4.12 and 4.13 show that the 15-year requirement can be met if all committed sites come forward alongside a proportion of the windfall allowance for the period. No Category 1, Category 2 or Category 3 SHLAA sites are therefore required under either of the 15-year scenarios.

4.42 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, technically, there is no need for any of the SHLAA sites without planning permission to come forward in order to meet the dwelling requirement as the requirement can be met by existing planning commitments and anticipated windfall sites.
4.43 As Tables 4.12 and 4.13 demonstrate, no SHLAA sites without planning permission are required, under any scenario. This provides a degree of 'headroom' for choices over which sites can be brought forward.

4.44 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. This is ultimately a policy choice to be considered by LCC and is outside of the remit of the SHLAA.

4.45 The policy choices available to the Council will also be informed by how the surplus position at the April 2018 base date is addressed over the 15-year plan period. As outlined earlier in our report, 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.

4.46 As explained above, 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 is in the right place to meet strategic policy objectives. These are choices to be made through the plan-making process.
5 SUMMARY

Overview

5.1 PBA is commissioned by Liverpool City Council to undertake the 2018 SHLAA Update. A total of 1,067 sites have been considered, comprising 410 ‘committed’ sites (with extant or imminent planning permission) and a further 657 sites – identified by the Council or suggested as part of a ‘call for sites’ exercise, which did not have planning permission as at April 2018 – and therefore were required to be assessed.

5.2 In accordance with the guidance contained within the 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

5.3 Based on Council data as at April 2018, the committed supply predicted to come forward within the 15-year plan period is 24,674 dwellings. From the committed supply, 12,879 dwellings are predicted to come forward within the first five years (between April 2018 and March 2023 as shown in Appendix 2).

5.4 Having regard to this committed supply and taking into account non-implementation, and demolition allowances, the Council is able to demonstrate a deliverable five-year supply against both a 5 per cent buffer and a 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.

5.5 The calculation of the level of deliverable five-year housing supply is dependent on how past housing delivery is taken into account. Three scenarios have been considered, namely a ‘zero-based approach’ (where past over-delivery of housing into taken in account), a surplus position starting from 2012 (1,226 dwellings provided in excess of the requirement), and a surplus position taken from 2013 (2,069 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 (+1,226)</th>
<th>2013 Surplus (+2,069)</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 (1,739 x 5)</td>
<td>8,695</td>
<td>-</td>
</tr>
<tr>
<td>A2</td>
<td>5-year Housing Requirement (1,739 x 5), less surplus</td>
<td>n/a</td>
<td>7,469</td>
</tr>
<tr>
<td>B</td>
<td>5-year Housing Requirement plus 5% NPPF buffer</td>
<td>9,130</td>
<td>7,842</td>
</tr>
<tr>
<td>C</td>
<td>5-year Housing Requirement plus 20% NPPF buffer</td>
<td>10,434</td>
<td>8,963</td>
</tr>
<tr>
<td>D</td>
<td>Committed supply at April 2018 expected to come forward in the 5-year period (April 2018 and April 2023 - see Appendix 2)</td>
<td>12,879</td>
<td>12,879</td>
</tr>
<tr>
<td>E</td>
<td>Non-Implementation allowance (10% of D)</td>
<td>1,288</td>
<td>1,288</td>
</tr>
<tr>
<td>F</td>
<td>Demolition allowance (10 dwellings per annum x 5)</td>
<td>50</td>
<td>50</td>
</tr>
<tr>
<td>G</td>
<td>Total supply as at April 2018 D-(E+F)</td>
<td>11,541</td>
<td>11,541</td>
</tr>
<tr>
<td></td>
<td>Deliverable 5-year supply scenarios</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I1</td>
<td>5-year supply with 5% NPPF buffer (G/(B/5))</td>
<td>6.32</td>
<td>-</td>
</tr>
<tr>
<td>I2</td>
<td>5-year supply with 5% NPPF buffer - less surplus (G/(B/5))</td>
<td>-</td>
<td>7.36</td>
</tr>
<tr>
<td>I3</td>
<td>5-year supply with 20% NPPF buffer (G/(C/5))</td>
<td>5.52</td>
<td>-</td>
</tr>
<tr>
<td>I4</td>
<td>5-year supply with 20% NPPF buffer - less surplus (G/(C/5))</td>
<td>-</td>
<td>6.44</td>
</tr>
</tbody>
</table>

SHLAA Sites without Planning Permission

5.6 The 657 assessed housing sites which did not have planning permission at April 2018 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.
5.7 The 657 sites without planning permission could potentially yield a total of 17,107 dwellings. Of this theoretical dwelling yield, 16,009 dwellings could be expected to come forward within the 15-year study period:

- 780 dwellings could be expected to come forward for development within years 1 to 5;
- 6,615 dwellings could be expected to come forward for development within years 6 to 10; and
- 8,614 dwellings could be expected to come forward for development within years 11 to 15.

5.8 The remaining 5,091 dwellings could be expected to come forward for development beyond the 15-year study period.

5.9 Outstanding planning commitments together (after a non-implementation rate has been applied) are 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 SHLAA sites without planning permission coming forward over the same period as there are is an indicative supply of 780 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 2018 base date.

5.11 Both the 10-year target of 17,607 dwellings (under the 5 per cent ‘buffer’ scenario applied to the first five-year period) and the 10-year target of 18,260 dwellings (under the 20 per cent ‘buffer’ scenario applied to the first five-year period) can be fully met based on outstanding planning commitments alone taking into account the application of the ten per cent non-implementation 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 26,085 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 committed sites come forward alongside a proportion of the windfall allowance for the period.

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, technically, there is no need for any of the SHLAA sites without planning permission to come forward in order to meet the dwelling requirement, as the requirement can be met by existing planning commitments and anticipated windfall sites.

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. This is
ultimately a policy choice to be considered by LCC and is outside of the remit of the
SHLAA. However, as no SHLAA sites without planning permission are theoretically
required, under any scenario, this provides a degree of ‘headroom’ for choices over
which sites can be brought forward.