



The Planning Inspectorate

Report to South Kesteven District Council

by S R G Baird BA (Hons) MRTPI

an Inspector appointed by the Secretary of State

Date: 27 October 2020

Report on the Council's Annual Position Statement

The Statement was submitted to the Inspectorate on 31 July 2020

RECOMMENDATION to the COUNCIL

1. The South Kesteven District Council Draft Annual Position Statement (APS) July 2020 is confirmed subject to the following changes.
2. The "All Small Sites" contribution is increased by 90 dwellings.
3. The 5-Year supply is reduced by 285 dwellings comprising:
 - (a). APS015 - Spittlegate Farm, Gorse Lane, Grantham – reduce by 17 dwellings;
 - (b). APS032 - Barratt & DWH Development, Phase 2, Barrowby Road Grantham NG31 8SE; APS033 - Land off Poplar Farm, Barrowby Road, Grantham NG31 8SR; APS034 - Poplar Farm, Barrowby Road, Grantham NG31 8AF and APS035 - Poplar Farm, Barrowby Road, Grantham NG31 8AF – reduce by 50 dwellings;
 - (c). APS045 - Towngate West, Market Deeping – reduce by 73 dwellings;
 - (d). APS046 - Land at Linchfield Road, Market Deeping – reduce by 130 dwellings;
 - (e). APS048 - Rectory Farm (Phase 2 North West Quadrant) – reduce by 15 dwellings.

Context to the Recommendation

4. Paragraph 74 the National Planning Policy Framework (Framework) introduced an Annual Position Statement (APS). Planning Practice Guidance (PPG), updated in July 2019, sets out the process that a Council should follow if it wishes to confirm its housing land supply (HLS) through an APS. The assessment of an APS has 2-stages: Stage 1 – whether the correct process has been followed and Stage 2 - the sufficiency of the evidence submitted.
5. The APS has been assessed, on its merits, and no other material was considered.

Stage 1

Does the Council have a recently adopted plan?

6. The South Kesteven Local Plan 2011-2036 was adopted on 30 January 2020 and is, for the purposes of Framework paragraph 74, a recently adopted plan.

Has satisfactory stakeholder engagement been carried out?

7. Deliverability Information Request Forms were sent to developers, agents and landowners of all sites in the HLS as at 1 April 2020. The draft APS and an Engagement Statement were published with a 4-week consultation period. Those consulted comprised small and large developers; land promoters; private and public landowners; infrastructure providers, Lincolnshire County Council, neighbouring authorities and other relevant bodies.
8. On the information provided, satisfactory stakeholder engagement has been undertaken.

Stage 2

Is the evidence submitted sufficient to demonstrate a 5-year supply of deliverable housing sites?

Requirement

9. Local Plan (LP) Policy SP1 indicates a minimum requirement of 16,125 dwellings for the period 2011 to 2036. This includes an uplift from 625 to 650 dwellings per annum (dpa) from 2016 to account for market signals. The shortfall in housing provision from 2011 to 2020 is estimated at 490 dwellings. The Council spreads delivery of this shortfall over the remainder of the plan period (Liverpool Approach) giving a requirement of 3,403 dwellings over the 5-year period (2020 to 2025). The Housing Delivery Test (HDT) requires a 20% buffer to be added to the 5-year requirement. Thus the 5-year housing requirement calculated by the Council is 4,084 dwellings or 817 dpa.
10. The Council's use of the Liverpool Approach to address the shortfall is disputed. When considering how a shortfall in housing completions against planned requirements should be addressed, PPG indicates that any shortfall should be added to the requirement for the next 5 years, the Sedgefield Approach, then the appropriate buffer added. However, PPG continues to say that if: "... a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process rather than on a case by case basis..."
11. Here, whilst the Local Plan Inspector (LPI) confirmed¹ that the shortfall would be dealt with over the plan period using the Liverpool Approach, responses to the APS highlight that this position is not reflected in the LP. Attention is drawn to LP paragraph 5.13, which says, "A deliverable supply is to be calculated using the Liverpool Method for the first five years of the Plan, taking account of the shortfall since 2011 across the plan period." The respondents assert that the Liverpool Approach was only intended to be applied to the first 5-years of the plan period and now shortfalls should be dealt with using the Sedgefield Approach i.e. over the next 5-years.
12. Given the unequivocal statement made by the LPI and the reference in the APS the quote from LP paragraph 5.13 makes no sense and it is in any event contradictory. The accepted understanding of the Liverpool Approach is that any shortfall is dealt with over the remaining plan period. Indeed, dealing with any shortfall over the first 5-years of the plan period would have involved applying the Sedgefield Approach. Moreover, the latter part of the sentence refers to the plan period i.e. 2011 to 2035, which contradicts the first part of the sentence.
13. Although LP paragraph 5.13 is a nonsense, the clear intention is, that from its adoption the LP will use the Liverpool Approach to address the shortfall in delivery. This is the basis on which I have considered the APS. Thus, for the purposes of this APS, the 5-year housing requirement is 4,084 dwellings.

¹ Paragraph 146 – Local Plan Inspector's Report.

Supply

14. The 5-year HLS is made up of: Small Sites; Windfalls; Large Sites; Sustainable Urban Extensions (SUE); LP Allocations and Council Capital Programme sites. These total some 4,492 dwellings giving a 5.5-year supply.

Small Sites

15. APS Appendix 1: 5-Year Housing Supply 2020 includes a small-sites contribution of 595 dwellings. This comprises 505 dwellings with planning permission and a Windfall Allowance of 90 dwellings.
16. Small Sites contributing to the 5-year HLS are detailed in APS Appendix 5: Small Sites Under-Construction (199 dwellings) and Appendix 7 Small Sites with Planning Permission Not Under-Construction (462 dwellings) giving a total of 661 dwellings. The Council applies a 10% lapse rate, which if applied to the total number of dwellings in APS Appendices 5 and 7 would give a figure of 595 dwellings. There is no explanation of how the Council has arrived at the 505-dwelling figure.
17. It may be a coincidence that the Council's figure of 505 dwellings and the allowance for Windfalls (90) adds up to 595. However, that cannot be right; they are 2 separate elements in the supply side of the equation. Windfalls are unknown and their contribution is based on past trends and should not be subject to a lapse rate.
18. The use of a 10% lapse rate² and the likely contribution from Windfalls are disputed. On lapse rates, it is said that the requirement to apply a 20% buffer to account for persistent under-delivery³ highlights a general failure to translate supply into completions. It is asserted that this points to the lapse rate being much higher. Therefore, as a precaution, 20%, i.e. a figure equivalent to the HDT buffer, would be more appropriate.
19. The Council acknowledges that the 10% lapse rate is not based on local monitoring and originates from the LPI's initial observations. Whilst the 10% figure appears arbitrary, it is, in the absence of monitoring, an accepted rule-of-thumb applied in LP production. Here, whilst the HDT highlights a problem translating supply into delivery, there is no objective evidence to support a doubling of the small sites lapse rate. Accordingly, it is reasonable to maintain the 10% lapse rate as discussed during the LP examination.
20. APS Table 6 lists windfall completions from 2011 to 2020 across the district and not just the smaller villages. Whilst the figures fluctuate significantly from year to year, the average for the period 2011 to 2020 is 64 dpa. The windfall allowance for Years 3, 4 and 5 of the HLS is based on a finding by the LPI that 30 dpa was justified by the evidence. Windfall development generally relates to small sites that unexpectedly become available and as Table 6 shows their contribution from year to year cannot be reliably anticipated. The windfall contribution included in the 5-year supply suggests that the Council has been very cautious. That, in my view, is appropriate. The medium to long-term impact of the Covid 19 Pandemic on the construction sector is still largely unknown. However, the throttling back

² Representation References SKR.APS.016 & SKR.APS.017.

³ Table 1: Housing Delivery Rates 1 April 2011 to 1 April 2020.

of lending as a result, may have a greater impact on windfall developments than other parts of the supply. Thus, the inclusion of 90 dwellings is reasonable.

Conclusions on Small Sites and Windfalls

21. It appears the Council has underestimated the contribution of small sites to the 5-year HLS. On the above basis, the 5-year HLS should include an allowance for 595 dwellings for Small Sites with Planning Permission, including Sites Under Construction and a Windfall allowance of 90. Therefore, the total All Small Sites figure in Table 4 should be 685 dwellings. These are sites that the Framework says should be considered deliverable unless there is clear evidence that homes will not be delivered within 5-years. None of the small sites have been disputed.

Housing Sites in Dispute

22. Although the APS Engagement Strategy says that 30 sites are disputed, Appendix 4: Site Delivery Summaries and Disputed Sites identifies 29. Disputes generally relate to insufficient information to provide clear evidence to support delivery or that the suggested contribution should be adjusted to reflect planning permission lead-in times and market conditions.
23. Whilst the Council does not provide details of average lead-in times for obtaining planning permission, the submission that the process can take up to 4 years is unsubstantiated. In my experience, an average of 18 to 20 months from the submission of a valid application to the discharge of conditions is a reasonable measure to apply. With many of the sites, the Council's estimates of capacity and delivery trajectory is based on sites of similar size and location and the trajectory confirmed at the LP Examination.
24. The LP was examined against the policies in the 2012 Framework, which has been amended in relation to the definition of deliverable⁴. In relation to Category B sites i.e. *"where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years."* For these sites, the onus is on the Council to produce robust, up-to-date evidence to support their inclusion within a 5-year HLS. PPG⁵ on Housing Supply and Delivery provides examples of the evidence needed for a site to be considered deliverable.

Site APS002 The Old Quarry, Station Road, Castle Bytham.

25. Owned by a single developer this site has planning permission for 87 dwellings. The Council's trajectory, which the site owner/agent agrees with, is for 40 units in 2021/2022 and 47 units in 2022/2023. Whilst there is consensus that completions would occur within 5 years, the nub of the dispute is how many. The alternative suggestion is 40 units by 2025, albeit this is on an assumption that the owner may be pursuing a larger scheme for 136 units and the need to obtain permission.
26. The site is made up of 3 plots, A, B and C. The permission on Plot A for 18 self-build plots has been commenced with the construction of an access road. The

⁴ National Planning Policy Framework, Annex 2: Glossary.

⁵ Paragraph 007 Reference ID: 68-007-20190722.

plots have been marketed, but as of June 2020 there appears to be no interest. Reserved Matters approval for Plots B and C is anticipated by September 2020. The Council confirms that the applicant is not pursuing a scheme to increase the capacity of the site.

27. The site is available and offers a suitable location for development now. However, it is not entirely clear how this site is being made available i.e. as a whole for self-build plots or a mixture of self-build plots and market houses. Whilst the Council indicates that it has considered the implications of the Pandemic on development, there is no indication of how that assessment has been applied to a development of this nature. The potential impact of a throttling back of lending to individuals would have significant implications for self-build schemes. As such the Council's trajectory appears to be overly optimistic. Given that all reserved matters are scheduled for approval by September 2020, in my experience, if developed for market housing, the development of 87 units on this site would, on-balance, appear reasonable.

APS005 Land north of 372-400 Dysart Road, Grantham.

28. This is a site with full planning permission for 227 units. The permission has been implemented with the construction of the access road. However, commencement of construction of the dwellings is dependent on the approval of a modified scheme relating to the provision of affordable housing and a new outline application. The developer's trajectory shows 200 dwellings being completed in the 5-year period. There are, as far as I am aware, no infrastructure constraints to be resolved and most pre-commencement conditions have been discharged. On the information before me, the site is available and offers a suitable location for development now. On balance, there is a realistic prospect that 200 units would be delivered by Year 5.

APS013 Land north of Longcliffe Road and Ryedale Close, Manthorpe Road, Grantham.

29. This is a large site with outline planning permission for 480 dwellings. In line with the developer's revised trajectory, the contribution from this site to the 5-year HLS is reduced from 225 to 108 dwellings. The site is available and offers a suitable location for development now and there appears a reasonable prospect that 108 units would be delivered on this site.

APS015 Spittlegate Farm, Gorse Lane, Grantham.

30. This is a site for 21 dwellings, of which only 4 have a full planning permission and no extant reserved matters application for the remainder. The Council includes this site in the 5-year HLS on the basis that, "...the developer has at least 2 schemes that are currently under construction across the District and do not have a reputation of not implementing planning permissions." [sic]. In my view, all this shows is that here is a developer who can handle development on multiple sites; it says nothing about this site in terms of potential constraints. The site is available and offers a suitable location for development now. However, having regard to PPG⁶, the Council's response does not amount to the clear evidence required to justify the inclusion of 17 units within the HLS.

⁶ Housing Supply and Delivery, paragraph 007 Reference ID: 68-007-20190722.

APS18 Fossitt & Thorne, Eastgate Bourne.

31. This site has planning permission for 11 dwellings. Planning permission was first granted in mid-2007 and variously renewed with the last renewal in October 2017. Originally shown in the 5-year HLS as being completed in 2020/2021 based on the owner's response it is now slated for 2021/2022. APS Appendix 4: Large Sites Under Construction indicates that there is one dwelling under-construction. On this basis, a S278 Agreement appears to have been completed. From the information before me, there are no other constraints on this development. The site is available and offers a suitable location for development now. Even if a start on the construction of the remaining dwellings slips, given the modest scale of development, it is reasonable to expect the remaining 10 dwellings would be completed by 2025.

APS032 Barratt & DWH Development, Phase 2, Barrowby Road Grantham NG31 8SE; APS033 Land off Poplar Farm, Barrowby Road, Grantham NG31 8SR; APS034 Poplar Farm, Barrowby Road, Grantham NG31 8AF and APS035 Poplar Farm, Barrowby Road, Grantham NG31 8AF.

32. These sites form part of a SUE currently under-construction. Although the total capacity of the SUE is some 1,800 dwellings, construction is capped at 750 dwellings until the Pennine Link Road has been provided. APS Appendix 3 show 622 completions leaving a balance of 128 dwellings before the cap applies, which the Council includes in the 5-year supply.
33. The Housing Delivery Action Plan May 2018 identified that as of 31 March 2018, the balance between the 750 dwelling cap and those completed/under-construction was 250 dwellings. The Action Plan noted that until the required easements had been agreed with Network Rail (NR) only 200 dwellings could be delivered and that it was unclear how negotiations were progressing or if they had commenced. Effectively this introduces an additional cap on development of 50 dwellings. Whilst the Council refer to continuing discussions with developers/site promoters on delivery, there is no reference to the status of negotiations with NR or the impact a lack of agreement would have on the number of dwellings that can be constructed before the implementation of the LR.
34. This is a large site being delivered by several developers and there is no indication that development has stalled. On this basis, it is reasonable to conclude that completions will continue in the period up to 2025. However, having regard to the cap and the additional constraint on dwelling completions referred to above, only 78 dwellings (128-50) should be included in the 5-year HLS.

APS039 Swinstead Road/Bourne Road, Corby Glen.

35. The LP allocation has an indicative capacity for 250 dwellings. The site is in 2 ownerships and both owners have indicated that their delivery trajectories have considered the impact of the Pandemic. One owner has made a full application for 68 dwellings, with a start on-site in 2021/2022 and completion by 2025. The second owner has indicated that Heads of Terms have been agreed with a national housebuilder to acquire the site and a full application is anticipated for 190 dwellings. For this part of the site, the trajectory to 2025 anticipates 150

dwellings with a start in 2021/2022. These figures are consistent with the slated 210⁷ dwellings the Council suggests that this site would contribute.

36. The principle of large-scale development on this site is established, and I see no reason why the prospective developer of the larger parcel would need to submit an outline planning application. Whilst neither parcel has a planning permission, the likely commencement dates on both, 2021/2022, are consistent with my assumptions on the time needed to obtain permission. The site is available and offers a suitable location for development now. The inclusion of 210 dwellings in the 5-year HLS is reasonable.

APS041 Main Road (South) Long Bennington.

37. An outline planning application for 48 dwellings has been submitted with a likely decision in September 2020. If the application is determined by September, the likely commencement date proposed by the developer is consistent with my assumption of the time needed to obtain reserved matters. The site is available and offers a suitable location for development now. The inclusion of 48 dwellings in the 5-year HLS is reasonable.

APS042 Main Road (North), Long Bennington.

38. Although the LP allocation has an indicative capacity of 30 dwellings, the prospective developer anticipates the provision of 50 affordable dwellings. Although no application has been submitted, pre-application discussions have taken place. Development of the site is anticipated in Years 2 and 3 (2021/2022, 2022/2023) on the basis that development needs to start before March 2021 for grant funding purposes. This is a significant imperative driving implementation. The site is available and offers a suitable location for development now and the inclusion of 50 dwellings is reasonable.

APS043 Thisleton Lane and Mill Lane, South Witham.

39. This site is allocated in the LP for 34 units. The site is in 2 ownerships and although there are no current planning applications or an indication when applications would be submitted, the owners have signalled an intention to develop this site. The Council's trajectory for completions is not explained and is inconsistent with information provided by the owners. That said, the site is available and suitable for development, and, given the scale of the proposed development, it is reasonable to conclude that 34 dwellings could be completed in the 5-year period.

APS044 Land off High Street, South Witham.

40. This site is allocated in the LP for 31 units. The landowner indicates that the land is surplus to requirements and will be disposed of. To reflect this and the absence of a planning permission, the trajectory shows the site being developed in Years 3, 4 and 5. The site is available and offers a suitable location for development now and given the scale of the development, the inclusion of 31 dwellings is reasonable.

⁷ There is a discrepancy between the slated contribution to the 5-year supply listed in APS Appendix 4 which shows a figure of 250 and APS Appendix 1, which shows a contribution of 210. The difference is explained by 40 units on the larger parcel allocated to 2025/2026, which is outside the 5-year HLS period i.e. 250-40=210.

APS045 Towngate West, Market Deeping.

41. The LP allocates this site for 73 dwellings. There is no planning permission and in late 2018 the landowner indicated that an application would be submitted in 2019/2020. That application did not materialise and there is now an indication that an outline planning application would be submitted early in the second quarter of 2021. Although construction is slated for Year 3 (2022/2023) with some 23 completions, given the scale of the site, this strikes me as optimistic. However, there is the opportunity to provide completions within Year 5 (2024/2025). There is no indication of any progress on the site assessment work needed to underpin the consideration of a development of this scale. Whilst the site is available and offers a suitable location, having regard to PPG the Council's response does not amount to the clear evidence required to justify the inclusion of 73 units within the HLS.

APS046 Land off Linchfield Road, Market Deeping.

42. Allocated for 1,300 dwellings in the LP, the trajectory anticipates the completion of 130 dwellings in the first 5-year period. The landowner indicated in late 2018 the submission of an outline planning application in 2019/20. That did not materialise, and the indication now is that an application would be submitted in 2020/2021. Whilst the Council has been cautious and posted the first completions in Year 3, given the scale of this site and the evidence, this appears optimistic. Other than an agreement that confirms the landowner's intentions, there is no indication whatsoever of any progress on the site assessment work that is needed to underpin the consideration of a development of this scale. Whilst the site is available and offers a suitable location, having regard to PPG, the Council's response does not amount to the clear evidence required to justify the inclusion of 130 units.

APS047 Spitalgate Heath & APS049 Prince William of Gloucester Barracks Grantham.

43. These are large adjoining LP allocations for some 3,700 and 4,000 dwellings respectively whose delivery trajectory runs beyond the LP period. The 5-year supply contribution for Spitalgate Heath is 275 dwellings and 300 for the Barracks site with completions occurring on both sites in Year 3 (2022/2023). The LP allocation for the Spitalgate Heath site indicates that, incremental full applications will not be acceptable. Rather an outline or hybrid application will be required for the entire site accompanied by a detailed masterplan.
44. The promoter of Spitalgate Heath agrees with the Council's trajectory. However, this comes with caveats relating the effect of the Pandemic, the commencement of Phase 3 of the Grantham Southern Relief Road (GRRS) and the cost/delivery of services. Whilst the medium-term impact of the Pandemic is largely unknown, there is an appetite for this development to progress. Significant progress is being made on the planning application for the Spitalgate Heath site through a Planning Performance Agreement. Tendering for Consultants to progress the Barracks is in hand in anticipation that planning applications will be submitted in 2021 and the completion of a Planning Performance Agreement.
45. The Highway Authority has reaffirmed its commitment to the GRRS and preparatory work on Phase 3, the final phase, has begun. A Grantham South Utilities Group has been formed and Consultants appointed to assess infrastructure constraints. Early work on service provision indicates that substantial and phased upgrades to the electricity supply network will be

required. In addition, it is assessed that the southern Grantham sites can be drained for foul water at relatively low cost but that the addition of the Barracks development will require an extensive sewer upgrade.

46. These are complex developments and the Spitalgate Heath site is far more advanced in terms of progress than the Barracks site. That said, having regard to PPG advice, these are sites that are, in part, available now and are suitable. The inclusion of 575 dwellings is reasonable.

APS048 Rectory Farm (Phase 2 North West Quadrant).

47. This site is part of a LP allocation for some 1,150 dwellings and adjoins the Poplar Farm site where construction has taken place. That said the Rectory Farm site has yet to secure planning permissions. Three applications are outstanding, and the land will not be disposed of until planning permission is obtained. Responses from the landowners and potential developers indicate confidence in completions starting in 2022/2023 albeit with reduced completions in 2024/2025 i.e. 90 as opposed to the Council's proposed 120. In the 5-year HLS, the Council whilst reducing the likely contribution from 120 to 105 offer no explanation as to why the landowners'/developers' estimates are not accepted. Thus, whilst the site is available now and suitable, there is not clear evidence to support the inclusion of 225 dwellings and the supply should be reduced by 15.

APS050 Wilsford Lane (North), North Ancaster.

48. This is a LP allocation for 96 dwellings. An outline application has been submitted and based on my assumptions on achieving permissions, a start on site in Year 2, 2021/2022 is reasonable. The site is available and suitable for development and there are no fundamental infrastructure constraints to be resolved. Accordingly, it is reasonable to conclude that 96 dwellings could be completed in the 5-year period.

APS051 Wilsford Lane (South), Ancaster

49. This is a LP allocation for 35 dwellings. The site is currently the subject of pre-application discussions and the agreed trajectory is for completions in 2023/2024. I am not aware of any fundamental infrastructure constraints. The site is available and suitable for development. This is a small site and even if delivery does slip, it is reasonable to conclude that 35 dwellings could be completed in the 5-year period.

APS055 Part of Elm Farm, Thurlby.

50. This is a LP allocation for some 50 dwellings. The contribution of this site to the 5-year HLS has been reduced from 40 to 20 as a result of the owner's caution over the impact of the Pandemic. Although no planning application has been submitted or a developer identified, the site is available now and suitable. Given the scale of the site it is reasonable to conclude that some 20 dwellings could be delivered by Year 5, 2024/2025.

APS056 Manning Road, Bourne.

51. This is a LP allocation for 107 dwellings. Although a full application has yet to be determined, the landowner/developer are confident that development could commence in Year 2, 2021/2022 with completion by Year 5, 2024/2025. The number of completions estimated for Year 2 is slated at a cautious 11. The site is

available and suitable and even if commencement slips, the low number of starts in Year 2 could be spread over the remaining years. On this basis, the inclusion of 107 dwellings is reasonable.

APS059 Stamford East.

52. This is a LP allocation for 162 dwellings. It seems that the landowner/developer of part of this site has started pre-application discussions with the Council to include a retail unit as part of the development. Whilst the LP allocation makes no reference to a retail scheme, the Council do not dismiss the suggestion. The site is available now and suitable and given the timescales, the inclusion of 22 dwellings is reasonable.

APS061 Wellington Way, Market Deeping.

53. This is a Council owned site for 11 affordable homes. The submission of a full planning application is anticipated by December 2020. Although the Council has not indicated that Members have been consulted on the release of this site, I doubt whether feasibility work, which has included ground condition, levels surveys and an indicative layout would have been undertaken in the absence of Member support. Given the modest scale of the development, the contribution of 11 dwellings to the 5-year HLS is reasonable.

APS062 Hugh Moore School, Grantham.

54. This is a Council owned site for 60 affordable homes. Although there is no planning application or Member consultation, significant feasibility work has been undertaken. I doubt whether such works would have been undertaken were the Council not confident that this site would be released. On this basis, the contribution of 60 dwellings to the 5-year HLS is reasonable.

APS063 Kesteven Road, Stamford.

55. This is a Council owned site for 23 affordable homes. A timetable for a planning application has not been specified. However, feasibility work, including ground condition and levels surveys is progressing. The submission of a full planning application is anticipated by December 2020. Although the Council has not indicated that Members have been consulted on the release of this site, I doubt whether feasibility work would be proposed if the Council were not confident that this site would be released. Given the modest scale of the development, the inclusion of 23 dwellings is reasonable.

APS064 Shaw Road, Grantham

56. This is a Council owned site for 12 affordable homes. A timetable for a planning application has not been specified. However, feasibility work, including ground condition and levels surveys is progressing. The submission of a full planning application is anticipated by December 2020. Although the Council has not indicated that Members have been consulted on the release of this site for residential development, I doubt whether feasibility work would be proposed if the Council were not confident that this site would be released. On this basis and given the modest scale of the development, the inclusion of 12 dwellings is reasonable.

APS065 Beaufort Drive, Bourne.

57. This is a 30-dwelling partnership scheme between the Council and an affordable housing provider. A planning application has been submitted with determination pending. Given the modest scale of the development, the inclusion of 30 dwellings is reasonable.

Conclusion on the Deliverable Housing Supply

58. It appears that the Council has underestimated the contribution from Small Sites and 90 dwellings should be added to the supply. On the disputed sites, clear evidence has not been produced to support the inclusion of 285 dwellings within the supply. The 5-year supply should be reduced by 285 dwellings to 4,297 dwellings ($4,492 + 90^8 - 285 = 4,297$).

Conclusions

59. The South Kesteven District Local Plan 2011-2036 is a recently adopted plan and satisfactory stakeholder engagement has been undertaken.
60. Following an adjustment to increase the contribution from Small Sites, the 5-year total supply calculated by the Council should be reduced by 285 dwellings to 4,297 dwellings. Notwithstanding the reduction, the Council can demonstrate a 5.26-year housing land supply.

George Baird

Inspector

⁸ Paragraph 16 above.