



Report to South Kesteven District Council

by John Felgate BA(Hons) MA MRTPI
an Inspector appointed by the Secretary of State

Date 5 October 2022

Report on the Council's 5-Year Housing Land Supply Annual Position Statement 2022

The Annual Position Statement was submitted by the Council on 29 July 2022

RECOMMENDATION TO THE COUNCIL

1. Based on the Annual Position Statement submitted by South Kesteven District Council on 29 July 2022, it is confirmed that a 5 year supply of deliverable housing sites has been demonstrated.
2. The Annual Position Statement should be amended as follows:
 - i) The housing requirement for the period 2022-27 be corrected to 3,913 units.
 - ii) The 5-year deliverable supply be amended by making the following changes:
 - APS007(S) Bridge End Road, Grantham: delete (120 units)
 - APS011(S) Grantham Church High School, Queensway: delete (40 units)
 - APS041 Main Road (South), Long Bennington: delete (10 units)
 - APS043 Thistleton Lane/Mill Lane, South Witham: delete (24 units)
 - APS045 Towngate West, Market Deeping: delete (73 units)
 - APS047 Spitalgate Heath, Grantham: reduce to 50 (deducting 125 units)
 - APS048 Rectory Farm Phase 2, NW Quadrant, Grantham: reduce to 240 (deducting 90 units)
 - APS049 Prince William of Gloucester Barracks, Grantham: reduce to 50 (deducting 125 units)
 - APS058 Stamford North: reduce to 100 (deducting 70 units)
 - APS063(S) Land at Brittain Drive, Grantham: delete (16 units)
 - iii) The resulting housing supply be reduced by 693, to a total deliverable supply of 4,077 units.
 - iv) The resulting years' supply figure be reduced to 5.2 years.
3. Subject to the above amendments, the Council is now entitled to rely on the 5-year supply shown in the APS for a period of one year, until 31 October 2023.

PROCEDURAL CONTEXT

4. The National Planning Policy Framework (the NPPF), at paragraph 75, provides that a planning authority may establish the existence of a 5-year supply of deliverable housing sites in their area through the preparation of an Annual Position Statement (an APS). The procedures for the preparation of an APS, and its confirmation by the Planning Inspectorate (PINS), are set out in the Planning Practice Guidance (PPG) on Housing Supply and Delivery, last updated in July 2019¹.

¹ PPG paragraphs 68-004-20190722 to 68-18-20190722

5. In the present case, the Council informed PINS of its intention to submit an APS for 2022, on 21 March 2022. The draft APS was submitted on 29 July 2022. The draft APS is accompanied by a Statement of Engagement containing details of the consultation and liaison undertaken by the Council, the responses received, and the adjustments made to the APS as a result.
6. When assessing an APS, the PPG requires PINS to carry out a 2-stage assessment. The first stage will be to examine whether the correct process has been followed, and secondly whether the evidence submitted is sufficient to demonstrate a 5-year supply. My report follows this sequence.
7. As required by the PPG, I have assessed the submitted APS solely on the basis of the written evidence before me.

STAGE 1 ASSESSMENT

Whether the circumstances in South Kesteven District fall within those where a 5-year supply may be established by way of the APS procedure

8. The PPG provides that authorities can seek to confirm their land supply through an APS either where they have a 'recently adopted' Local Plan, or where they are able to renew a previously confirmed APS.
9. In the present case, the Council adopted the South Kesteven District Local Plan (the SKDLP) in January 2020. Having regard to the NPPF Footnote 40, that plan is no longer regarded as recently adopted for the purposes of the 5-year land supply.
10. However, the Council subsequently submitted APSs for the years 2020 and 2021, which were confirmed by PINS in October 2020 and October 2021 respectively. The most recent of these previous APSs relates to the 5-year period commencing 1 April 2021. That APS remains valid until 31 October 2022. On this basis therefore, the authority is eligible to renew its land supply for the period commencing 1 April 2022.
11. The draft APS now submitted, for 2022, addresses the 5-year supply for the period 1 April 2022 – 31 March 2027. The draft APS therefore follows on from the previously confirmed APS. As such, the draft APS falls within the range of circumstances where the PPG permits a 5-year supply to be confirmed by way of renewal.

Whether satisfactory stakeholder engagement has been carried out

12. The nature of the stakeholder engagement that a Council should undertake in connection with an APS is outlined in the PPG. Authorities are advised to engage with developers, stakeholders and others who may have an impact on housing delivery.
13. In the present case, the Council's engagement process comprised two stages. In the first stage, information was sought from the promoters of the included sites, via a 'Deliverability Information Form' request. The pro-forma sought comments on the officers' preliminary assumptions as to individual site trajectories, and sought answers to a series of questions regarding possible constraints, together with a statement indicating the parties' commitment to the development. Responses were received in

respect of 56% of the sites. The information received was used to inform the revised site capacities and development programmes which were then incorporated into the draft APS.

14. At the second stage, a full draft version of the APS was published for consultation. Invitations to comment were issued directly to a list of 148 stakeholders, including a range of statutory consultees, service and infrastructure providers, local organisations, neighbouring authorities, developers, landowners, agents and registered housing providers. A general invitation to other parties was also posted on the Council's website. Representations were received from 9 respondents. In some cases, these led to further adjustments being made to site capacities and programmes, for inclusion in the final version prior to submission.
15. The aim of the engagement process, as stated in the PPG, is to allow for robust challenge to the Council's assumptions, before seeking agreement and consensus where possible. Although the Council's list of invited stakeholders is wide-ranging, it is not possible to judge how comprehensive the list is, in terms of reaching all those who might have wished to express their views. In particular, the number of parties from the development industry seems relatively small, representing little more than 25% of the list; and it is not clear whether these extend beyond the promoters of the sites that are already included in the 5-year supply. But nevertheless, the list of stakeholders consulted covers broadly the range of interests that is required by the PPG. And given that this is the third consecutive year in which an APS has been undertaken in the District, it seems likely that by now the procedure, and the opportunities to participate, will be quite widely known by those with an interest. The PPG also states that the decision as to which stakeholders to involve is ultimately a matter for the authority. There is no evidence that anyone who wished to comment has been unable to do so. On balance therefore, the range of stakeholders covered by the engagement process in this case is acceptable.
16. Overall, am satisfied that the stakeholder engagement process carried out by the Council has been satisfactory.

STAGE 2 ASSESSMENT

Whether a 5-year housing land supply has been demonstrated

The housing requirement

17. The housing requirement figure is derived from Policy SP1 of the SKDLP, which sets a minimum target of 16,125 net additional dwellings over the whole of the plan period, 2011-36, with a stepped annual rate of 625 dwellings per annum (dpa) up to 2016, and then 650 dpa thereafter. For the five years of the APS period, 2022-27, this amounts to 3,250 units.
18. In addition, there is a cumulative shortfall in housing completions since the start of the plan period, of 859 units. The draft APS proposes to deal with this by spreading the shortfall over the whole of the remaining plan period, known as the 'Liverpool' method. Whilst this is not the method which the PPG says is normally to be preferred, the PPG does allow for other alternatives to be considered through the plan-making process. In the

present case, different approaches were considered at the SKDLP examination, including the alternative 'Sedgefield' methodology, but the Inspector eventually accepted the use of the Liverpool method, in order to counter what he described as a potentially fragile land supply situation, and thus make the plan's development strategy more robust. As a result, paragraph 5.13 of the adopted plan states that "*a deliverable land supply is to be calculated using the Liverpool method for the first five years of the plan period...*".

19. I note the arguments made by those who have commented on this element of the APS. I agree that neither the examining Inspector's comments, nor anything in the SKDLP text, should be seen as ruling out a switch to a Sedgefield-based calculation at some point in the plan period. To my mind however, that point has not yet been reached. In my view it is clear that the fragility that the Inspector was concerned about was related to the plan's reliance on a number of large strategic sites, and the need to ensure that these developments should not be put at undue risk due to the local housing market becoming over-saturated in the meantime, by smaller schemes outside the framework of the plan-led system. From the evidence available to me, that risk does not yet appear to have fully receded. The fact that the cumulative shortfall in delivery has worsened somewhat since 2021 does not undermine the logic behind this reasoning. It follows that the Council's continued use of the Liverpool method in the present year's APS is justified.
20. When the shortfall of 859 dwellings is phased over the remaining 14 years of the plan period, this adds 61.3 units per year to the annual housing requirement. For the 5-year period of the APS, this amounts to an additional 307 units, boosting the total from 3,250 to 3,557 units.
21. Where an authority is seeking to confirm its land supply through an APS, the minimum buffer required, under NPPF paragraph 74, is 10%. Given the District's positive score in the most recent Housing Delivery Test, there is no need for this buffer to be increased. In the draft APS, I note that the heading to Table 3 refers to a buffer of 20%, and the same figure is repeated in the corresponding entry in the Contents page. However, these appear to be simple cut-and-paste errors; the correct figure of 10% has evidently been used in the Council's calculations, and no mathematical error has occurred in this respect. The addition of the 10% buffer in this case amounts to a further 356 dwellings. Consequently, the overall 5-year requirement, including buffer, is 3,913 dwellings.
22. I note that in Tables 3 and 7 of the draft APS, this total requirement figure is shown in both cases as 3,912 dwellings, rather than 3,913. In this case, this does appear to be a mathematical error. Whilst the discrepancy is small, and the effect on the final calculation is negligible, the figure should be corrected, in the interests of accuracy.
23. The overall 5-year housing requirement for the period 2022-27 therefore amounts to a total of 3,913 dwellings.

The supply of deliverable sites

24. The Council's position as set out in the APS is that there is a supply of sites for 4,770 dwellings, equating to 6.1 years' worth against the above requirement. The APS divides these into seven categories, described as: small sites, windfall allowance, large sites not under construction, large sites under construction, 'sustainable urban extensions' (SUEs), local plan allocations, and capital programme sites.
25. The first two of these, relating to small sites and the windfall allowance, contributing 614 and 90 dwellings respectively, have not been disputed by any party, and I see no reason to disagree. The remaining five categories all include sites which have either been disputed by respondents or, on the evidence provided, are clearly open to objection on grounds of deliverability. I will therefore address each of these sites in turn.
26. In the NPPF's Glossary, the definition of 'deliverable sites' requires that, to be considered deliverable, as well as being suitable and available, sites should be achievable with a realistic prospect that housing will be delivered within five years.
27. The NPPF definition also distinguishes between two types of sites, usually referred to as Categories 'a' and 'b', and sets out differing requirements for each. For these purposes, the NPPF categories seem to me more helpful than those used in the present APS, and I have therefore arranged my report accordingly.

CATEGORY 'A' SITES

28. Four of the disputed sites fall into Category 'a', by virtue of having full or detailed planning permission. The NPPF requires that sites in this category are to be considered deliverable, until permission expires, unless there is clear evidence that homes will not be delivered within five years.

APS003: Land at Bridge End, Colsterworth

29. This site has full permission for 48 units. The APS expects the first units to be delivered in Year 3 (2024/25) and the whole development to be fully built out by the end of Year 5 (2026/27). There is no substantive evidence of any legal or other issues that would be likely to prevent a scheme of this size from being completed within this timescale. In the absence of any clear evidence to the contrary, I have no reason to doubt that the assumptions contained in the APS are realistic, and that the 48 units are therefore deliverable.

APS025: Zone 8, Elsea Park, Bourne

30. The site forms part of the Elsea Park SUE development. Zone 8 has full permission for 384 units, and is already under construction, with some early completions being recorded in 2021/22, prior to the start of the present APS period. The APS forecasts 245 further completions within the 5-year period to 2027, with 25 of these units coming in Year 1, and then increasing in stages up to 50 dpa in Years 2 and 3, and 60 dpa thereafter. Even at its peak, this represents a more cautious approach than in the Council's earlier draft version.

31. Although the initial completions achieved in 2021/22 were lower than previously forecast for that year, now that the development is under way I can see no reason to doubt that the rates now required are achievable. The 245 units forecast for the site can therefore be counted as deliverable.

APS029: East of A151, Raymond Mays Way, Zone 9, Elsea Park, Bourne

32. This site comprises part of Elsea Park's Zone 9, with full planning permission for 174 units. The site is again already under construction, with 9 and 40 units completed in 2020/21 and 2021/22 respectively. The APS assumes that the remaining 125 units will all be completed within Years 1-3. Based on the most recent year's performance this seems likely to be achievable, but even if the rate of delivery were to slow down for any reason, it is clear from the available evidence that the development can be completed quite comfortably within the 5-year APS period as a whole. The required 125 units are therefore deliverable.

APS030: North of Musselburgh Way, Zone 9, Elsea Park, Bourne

33. The site, also within the same SUE, is another that benefits from full planning permission and is now under construction, albeit without any completions prior to the APS period. The APS, based on information from the developer, suggests that all 63 of the permitted units will be completed within Year 1. Even if that forecast were to prove over-optimistic, there is no apparent reason why the development cannot be fully completed well within the relevant 5-year period. The 63 units are therefore deliverable.

CATEGORY 'B' SITES

34. The NPPF's Category 'b' includes all sites for 'major' development which do not yet have detailed planning permission. Such sites should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

APS002: The Old Quarry, Station Road, Castle Bytham

35. A self-contained first phase of 6 units is already under construction. The remainder of the site has outline permission for a further 81. Reserved matters applications have been submitted, and the Council appears to anticipate a favourable outcome to these quite soon. The APS assumes the 81 units being fully built-out within the 5-year period, with completions being delivered in years 3-5, at annual rates of between 23 – 34 dpa.
36. The timing of the scheme has evidently slipped somewhat over the years. However, the start of construction on part of the same site, and the apparent prospect of an imminent reserved matters approval, represent clear signs of progress. To my mind, these give a reasonable basis for confidence in the delivery forecast now advanced in the APS.
37. The Council's suggested building rates for the site, of up to 34 dpa, are slightly above those indicated by the site's promoter, but on the other hand, the start date in Year 3 is more cautious. No technical or infrastructure constraints have been identified. No binding commitment to these dates or numbers has been entered into, by the promoter or any other party, but such a commitment is not necessary for the purposes of showing whether there is a realistic prospect.

38. The evidence shows firm progress towards the delivery of housing on the site. The assumptions made as to timing and building rates seem reasonable, and thus have a realistic prospect of being achieved. Overall, I find sufficient clear evidence to support the inclusion of these 81 units.

APS007(S): Bridge End Road, Grantham

39. The site has outline permission for 205 dwellings. The APS envisages 120 of these being delivered within the relevant period, with the first completions in Year 3, and a build rate of 40 dpa throughout Years 3-5.
40. As yet, however, there has been no reserved matters application. Nor is there any indication of any work having been undertaken in connection with such an application, or any other progress towards submission. Whilst the Council's assumptions as to timing and build rates are apparently agreed by whoever completed the Delivery Information Form, there is no indication as to who has provided this response, or on whose behalf, or in what capacity. The Council acknowledges that their suggested programme for this site is based on a comparison with other sites in the district, rather than on any site-specific information.
41. It is stated that the owners have agreed to sell the land, but it is not clear whether agreement has been reached with a particular purchaser, or whether this is merely a general intention.
42. Overall, the information provided by both parties is extremely limited. There is no clear evidence of any recent progress, nor that housing completions will be delivered as suggested. The site therefore does not meet the definition of deliverable, and should not be counted as part of the 5-year supply at the present time. As such, this site should be **deleted** from the APS, resulting in the deduction of **120 units**.

APS011(S): Grantham Church High School, Queensway, Grantham

43. This site has outline permission for 40 dwellings, granted in 2021. The APS forecasts that all of these will be delivered in Year 5. However, there has not yet been any reserved matters application, nor is there anything to suggest that any discussions have been held, or any technical work carried out in preparation for such a submission.
44. No Delivery Information Form appears to have been received, and consequently the intentions of the site owner or promoter are unknown. There is no indication as to whether any arrangements have been entered into with a developer.
45. The timescale envisaged by the APS does not appear unduly challenging. But this on its own does not necessarily mean that development will take place within that period. In the absence of anything further, the information provided falls well short of what is needed for a Category 'b' site. There is no clear evidence that any housing completions are likely to be achieved within the relevant 5-year period. The site should therefore be **deleted**, with the deduction of these **40 units**.

APS017(S): North of Barnack Road, Stamford

46. The site has outline permission, granted in February 2022, for a mixed-use scheme including 190 dwellings, plus some commercial elements. The APS forecasts 80 units coming forward within the APS period, in Years 4 and 5.
47. Although no Delivery Information Form appears to have been completed, it is evident that the development involves a certain amount of complexity. Given that part of the site is owned by the Council, together with another major landowner, the lack of fuller information is somewhat surprising. But nevertheless, conditions relating to archaeology, contamination, and demolition have been discharged, and extensive demolition works are said to be now under way. These matters seem to me a good indication that the relevant parties are committed to the scheme, and that reasonable progress is being made towards implementation.
48. No party has questioned the Council's forecasts as to the timescale or annual building rates for the development, and I see no reason to doubt that these are achievable.
49. In the light of the progress made to date, I find that there is sufficient clear evidence to support the inclusion of the site in the APS, and the numbers of completions forecast.

APS041: Main Road (South), Long Bennington

50. This site has outline permission for 50 dwellings, granted in May 2022. The APS envisages the first 10 units being delivered in Year 5. However, no Delivery Information Form has been submitted, and there is therefore no evidence as to the relevant parties' intentions, nor whether the timescale suggested in the APS is seen by them as realistic.
51. Whilst the recent grant of outline permission represents a degree of progress, there is no indication as to whether any site assessments, or other technical work needed for the reserved matters stage, have been commenced. Although the site is said by the Council to have no infrastructure constraints, the basis for this assertion is not clear.
52. I note that the Inspector who reported on the Council's 2021 APS recommended that this site be deleted, due to a lack of clear evidence that completions would be achieved within the relevant period. Although some progress has been achieved since then, the site remains in Category 'b', and having regard to the NPPF's definition, I consider that the previous Inspector's conclusion still applies. The site should therefore be **deleted**, resulting in the deduction of **10 units**.

APS043: Thistleton Lane/Mill Lane, South Witham

53. The site is allocated for development in the SKDLP, with a capacity of 34 dwellings. There is no planning permission, and no application has yet been made. The APS anticipates 24 units being delivered within the 5-year period, starting with the first completions in Year 3.
54. The site ownership is divided between two parties, both of whom have submitted Delivery Information Forms. From these responses, it is evident that the two owners are working independently rather than in tandem, with

different expectations as to timescales, and differing perceptions of the likely issues. This lack of coordination seems to me to have the potential to cause significant delay. There is no suggestion that the site can be subdivided or developed in phases to accommodate the owners' individual requirements. There is no apparent acknowledgement of these issues in the Council's suggested programme.

55. In addition, the landowners' responses indicate potential issues regarding ecology, an off-site footpath, and the existing poultry farm on the site. One of the responses estimates that site preparation will take 18 months or more. There is no explanation as to how far these potential constraints have been assessed, or how they may affect the timing of development.
56. I note that the site was considered in the context of the 2020 APS, and on that occasion the Inspector accepted the inclusion of all 34 dwellings within the 5-year supply. But there is no sign of any progress having been made since that time. Based on the information before me now, there is no clear evidence that completions will be achieved on the site within the APS period. The site should therefore be **deleted**, and these **24 units** deducted from the supply.

APS045: Towngate West, Market Deeping

57. The site is a SKDLP allocation for 73 dwellings. It has no planning permission, nor any current application. The APS envisages all 73 units being delivered in Years 4 and 5.
58. The Delivery Information Form provided on behalf of the landowner states an intention to submit an outline application before the end of 2022, and to market the land for development. However there is no indication that any site assessment or other preparatory work has been carried out towards such an application. The answers provided in relation to infrastructure requirements are, at best, non-committal.
59. I see no reason to doubt the land owner's stated intentions, to see the site developed in accordance with the local plan allocation. However, there is as yet no sign of any progress towards that aim. Nor is there any evidence that such a development can be carried out within the required timescale. In the circumstances, the site should be **deleted**, with a consequent deduction of **73 units**.

APS047: Spitalgate Heath, Grantham

60. The Spitalgate Heath 'Garden Village' forms part of the Grantham Southern Quadrant SUE, which is allocated in the SKDLP with an estimated total capacity of up to 7,700 dwellings. Of these, 3,425 are planned within the Local Plan period, with the remainder to follow after the year 2036. At the Spitalgate Heath site itself, 1,650 units are expected within the plan period. Of these, 175 units are included in the present APS, with completions coming in Years 4 and 5. The annual rates required to achieve this are 75 dpa and 100 dpa respectively.
61. The Garden Village scheme is clearly a large and complex one, involving the provision of new schools, a local centre, sports facilities and open space, as well as residential development. An outline application has been

with the Council since 2014, and although the Council resolved in 2017 and 2019 to grant outline permission, the application remains undetermined. Whilst environmental issues have been addressed in an Environmental Statement and subsequent Addendum, it appears that infrastructure requirements remain to be resolved, including the need for a new primary sub-station and major upgrades to the foul drainage system, to serve the SUE as a whole. A joint working group which was initially set up to consider these issues is reported to have been dissolved, following the withdrawal of Homes England. In addition, the programme for the Grantham Southern Relief Road (the GSRR) has been put back by 18 months, and from the information before me it is not clear what impact this may have on the timing of some phases of the development.

62. The site promoter states, in the Delivery Information Form, that no contractual arrangements will be entered into with house builders until the outstanding S.106 issues are resolved. Concern is also expressed that progress has been hampered in recent months by the Council's prolonged failure to provide a nominated case officer.
63. Quite clearly, a considerable amount of work has been undertaken to reach the present stage, and to my mind there is no doubt that both the site promoter and the Council have demonstrated a high level of commitment to the scheme. But as things stand, there are evidently substantial issues still to be resolved. There is no certainty that agreement will be reached on those issues, or the timescale that might be needed for this. There is also no defined programme or timescale for the necessary commercial negotiations, or for the discharge of conditions, reserved matter approvals, or site preparation and infrastructure works, prior to any house completions. Nor is there any evidence to support the Council's somewhat optimistic-looking expectations as to building rates.
64. In the 2020 APS, the Inspector accepted the inclusion of 275 units over three years, with delivery starting in 2022/23. In the 2021 version, the same figure was put forward, but the Inspector thought it safer to push back the start by a further year to 2024/25, reducing the deliverable completions to 175 units. Since then, although discussions have continued, there appears to have been no actual progress towards approval.
65. Given the evident commitment shown by all parties, it seems to me that there is reasonably strong evidence that the development will deliver housing completions within the APS period. However, in view of the obstacles and uncertainties that remain, there is insufficient information to support the timing suggested in the APS. Nor is there any evidence to justify the Council's suggested building rates, including in particular the forecast of 75 units within the first year of construction, which appears especially optimistic.
66. I conclude that the maximum number of completions at Spitalgate Heath, that can realistically be relied on within the APS period, is 50 units; and that none of these can reasonably be relied on before Year 5. The 5-year supply should therefore be **reduced by 125 units**.

APS048: Rectory Farm Phase 2, N.W. Quadrant, Grantham

67. Rectory Farm forms part of the Grantham North West Quadrant SUE. The development of Phase 1, known as Poplar Farm, is already well under way. The SKDLP allocates a further 1,554 dwellings in the plan period, including 1,150 dwellings at Phase 2. Three planning applications have been submitted and benefit from resolutions in favour. Together these would grant full permission for 448 units, and outline permission for a further 817 units. The APS sees 330 units being delivered in the next five years, spread over Years 2-5, at annual rates of 60-120 dpa.
68. No planning permissions have yet been formally issued, and in one case the resolution is subject to updated environmental and viability information. But nevertheless, there is no suggestion that these requirements are likely to become stumbling blocks. Although the site is in three ownerships, the landowners appear to be acting together. Contracts have not yet been finalised, but a preferred development partner has been identified. Whilst the Phase 2 development will make use of the new railway bridge to be constructed at Poplar Farm, the Council states that the timing need not be dependent on this. Indeed, works in connection with access to the Phase 2 site are said to have been commenced.
69. In the 2020 APS report, the Inspector accepted that the first completions could be achieved in the third year of that 5-year period, 2022/23. However he reduced the maximum annual rate from 120 dpa to 90 dpa. In the 2021 version, the Inspector accepted that the development could still produce completions starting from 2022/23, but since then progress seems to have stalled. The site promoter does not now appear to anticipate any completions before Year 3, nor an annual building rate above 100 dpa.
70. On the evidence available, it seems to me that a cautious approach to this site is still justified. Whilst there is still a realistic prospect of achieving some housing completions within the APS period, it seems very unlikely that any of these will be before Year 3, or that the build rate will exceed 90 dpa in any of these years. To my mind therefore, the balance of the evidence points to completions in Years 3-5, of around 60, 90 and 90 dpa respectively, totalling 240 within the relevant period. This will result in an overall **reduction of 90 units**.

APS049: Prince William of Gloucester Barracks, Grantham

71. The Prince William of Gloucester Barracks site forms part of the Grantham Southern Quadrant SUE. The SKDLP allocates the Barracks site for residential development with an overall capacity of 4,000 dwellings, of which 1,775 are planned within the local plan period, up to year 2036. New schools, employment space and a neighbourhood centre are also proposed. The APS forecasts 175 of the dwellings coming within the relevant 5-year period, with completions in Years 4 and 5.
72. The site is in single ownership, under the Ministry of Defence. Survey work and discussions with the Council are said to be under way. Stakeholder meetings are planned. An outline application is said to be in preparation, for submission in 2023. However, to date there has been no planning application, and no evidence of any site assessment studies.

73. A 4-year delay in the closure programme for the Barracks has recently been announced, resulting in the site remaining partly occupied up to 2028. Whilst the site promoter states that a phased release is planned, there appears to be no further information or explanation as to how the early phases of development would be accommodated, alongside continued military use and operational requirements.
74. It is not disputed that the site depends on the new electricity and sewage infrastructure that are planned for the Southern Quadrant, but there is no information as to how the Barracks site will be required to contribute to the funding of these items, or how such funding is to be secured. The site will also be dependent to some degree on the GSRR, and there is equally no clarity as to how the development will be affected by the delays that are now expected in the completion of this major new road.
75. In the 2020 APS, the Inspector accepted the inclusion of the site, but that was on the basis that a planning application was to be submitted in 2021. In the 2021 APS, the Inspector reduced the expected numbers for the site, in anticipation of possible delays. Since then, it seems to me that the likely timing of housing completions at the site has again receded somewhat.
76. I conclude that whilst it is still realistic to anticipate some housing completions within the APS period, it is unlikely that any of these will be before Year 5. The delivery programme therefore needs to be pushed back by one year. Accordingly, the deliverable contribution from the site should be amended to 50 units, and the overall supply **reduced by 125 units.**

APS054: Folkingham Road, Morton

77. The site is owned by Lincolnshire County Council and allocated for residential development in the SKDLP. Outline permission was granted in July 2021 for 71 dwellings. The APS anticipates 50 of these units being delivered within Years 4 and 5 of the present 5-year period.
78. No reserved matters have yet been submitted. However, negotiations are reported to be under way for the sale of the land to a developer, with a view to proceeding with reserved matters and the discharge of conditions thereafter. The programme envisaged in the APS appears to allow adequate time for these stages. No technical or other constraints are known, nor are any infrastructure works identified. The annual build rates required, at 20-30 dpa, seem relatively easily achievable.
79. Based on the information provided in the Delivery Information Form, I am satisfied that the sale of the land is moving forward, and that in this case this amounts to clear evidence of progress, giving a realistic prospect of achieving the required 50 completions.

APS055: Land at Elm Farm, Thurlby

80. The site is allocated in the SKDLP for 50 dwellings. The APS envisages 30 of these being delivered within Years 3-5 of the relevant 5-year period. No planning application has yet been made, but negotiations are said to be proceeding with a named developer, with a view to an application.

81. Although the scheme will require the relocation of the existing farmyard, there is no suggestion that this will delay the start of development. No other technical or infrastructure issues are identified. In both of the previous APS's, the site was accepted by the Inspectors for inclusion in the supply. Given the site's size and nature, I agree that the timescales and build rates assumed in the present APS are realistic. The 50 units on this site can therefore be counted as deliverable.

APS058: Stamford North

82. The Stamford North site forms part of a large, mainly greenfield SUE that straddles the administrative boundary with the adjoining area of Rutland County Council. In the SKDLP, the South Kesteven part of the site is allocated for 1,300 dwellings. The APS expects 170 of these units to be delivered within the 5-year period, with the first completions starting in Year 3, at annual rates of 40-70 dpa.
83. From the information provided, it is evident that the various landowners and authorities are working in concert to deliver the overall development, with the process being led by a 'master developer'. A good deal of the necessary assessment work, including traffic modelling, has apparently been carried out. A development brief has been prepared, and a public consultation exercise has been held. The parties are said to be working towards the submission of an application. No major technical issues or constraints are identified, and site preparation works are expected to require only three months, enabling a relatively fast start once the necessary approvals are in place. The site is also said to lend itself to three separate developer outlets on different parts of the site, which could be built in parallel.
84. But on the other hand, the scheme is clearly a complex one. Amongst other infrastructure, the development is required to incorporate a new east-west link road, which will serve the SUE as a whole. A school, local centre and open space are also required. In the absence of any application, it is not clear how far these issues, and the necessary funding arrangements, have been resolved. The cross-boundary nature of the SUE, and the need for coordination between the authorities, has the potential to lengthen the time scale needed for these and other aspects during the outline planning stage.
85. In the 2021 APS, the Inspector found that the timing then envisaged was unrealistic, and recommended that the programme be adjusted to avoid reliance on any completions in the first three years of that APS period. From the information available, little has changed since then.
86. Overall, I am satisfied that there is still a realistic prospect of achieving housing completions within the present APS period. However, given the state of progress, and the potential obstacles remaining, the evidence does not justify excessive optimism about the timing. I conclude that the programme should be pushed back by one year, to leave 100 units, to be delivered within Years 4 and 5 only. The 5-year supply is therefore **reduced by 70 dwellings.**

APS063(S): Land at Brittain Drive, Grantham

87. This site is included in the APS with an expected housing delivery of 16 units, all coming in Year 3. However, it does not appear to have any planning permission, or permission in principle, and nor is it allocated in the development plan, or included in the local Brownfield Register.
88. The site is said to be identified for development in the Council's capital programme. However, inclusion in that programme does not confer any planning status, and the principle of housing development is therefore untested through the planning process. A pre-application enquiry was apparently submitted in 2021, but no planning application has been made.
89. The Council acknowledges that there are technical constraints relating to a pylon, and also an unregistered ransom strip. These matters suggest that the feasibility and viability of the development remain to be assessed. It is also stated that, due to these issues, other sites may now be prioritised ahead of this one.
90. No clear evidence has been produced to support the inclusion of the site in the APS. The site cannot be counted as deliverable, and should be **deleted**. This results in the loss of a further **16 units** from the 5-year supply.

APS060: Quarry Farm, Rutland

91. The Quarry Farm site forms that part of the cross-boundary Stamford North SUE which lies within the administrative area of Rutland County Council. The site itself has a stated capacity of 650 dwellings. The APS includes these 650 dwellings as part of the longer-term housing supply for South Kesteven District, albeit outside the immediate 5-year period for which PINS' confirmation is sought.
92. The inclusion of the site is challenged by Rutland County Council, on the grounds that the dwellings in question are required to meet needs arising in Rutland. In this connection, I note that the SKDLP refers in a footnote to a Memorandum of Co-operation on this matter between the two authorities. However, that document is not before me, and I therefore cannot draw any meaningful conclusions in this regard.
93. In any event, it appears that the site does not yet have outline planning permission, and is not allocated for development in the adopted development plan for Rutland. In the absence of any further evidence, I agree that the site cannot be regarded as deliverable at the present time.
94. Nonetheless, as the APS places no reliance on any completions from the site within the current 5-year period, there is no need for any adjustments to be made. Any consideration of the land supply available beyond this 5-year period is outside the scope of my report.

Summary: housing land supply

95. To summarise the foregoing, I find that adjustments to the APS' delivery forecasts should be made in respect of the following sites:

- APS007(S) Bridge End Road, Grantham: delete 120 units
- APS011(S) Grantham Church High School, Queensway: delete 40 units
- APS041 Main Road (South), Long Bennington: delete 10 units
- APS043 Thistleton Lane/Mill Lane, South Witham: delete 24 units
- APS045 Towngate West, Market Deeping: delete 73 units
- APS047 Spitalgate Heath, Grantham: reduce by 125 units
- APS048 Rectory Farm Phase 2, NW Quadrant: reduce by 90 units
- APS049 Prince William of Gloucester Barracks: reduce by 125 units
- APS058 Stamford North: reduce by 70 units
- APS063(S) Land at Brittain Drive, Grantham: delete 16 units

96. Together, these recommended deletions and reductions amount to 693 units. These are to be deducted from the Council's claimed 5-year supply of 4,770 units. The remaining deliverable supply for the 5-year period is therefore 4,077 units.

Conclusion on housing supply in relation to requirement

97. For the reasons set out above, I have found that the 5-year housing requirement is 3,913 units, and the deliverable supply is 4,077 units. This represents a supply of 5.2 years.

OVERALL CONCLUSION

98. I conclude that the South Kesteven District Council APS dated July 2022 has succeeded in demonstrating a housing land supply exceeding the NPPF's minimum requirement of 5 years.

J Felgate

INSPECTOR