



YORK

CITY OF YORK
LOCAL PLAN
Strategic Housing Land Availability
Assessment (SHLAA)
May 2018

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Note:

The inclusion of sites within this study should not be taken to imply that the Council would consider planning applications favourably. Although it will inform housing allocations, it will not determine the allocation of land for housing development. It will also not prevent sites being brought forward or allocated for purposes other than residential development. All future planning applications will be considered individually and will be assessed through policies in the most up to date development plan.

1 INTRODUCTION

1.1 Purpose of this report

1.1.1 The aim of the Strategic Housing Land Availability Assessment (SHLAA) is to ensure that there is an informed understanding of the likely availability of land for housing within York over the Local Plan period (15 years). This document supersedes previous versions to present the sites assessed for their development potential to form part of the evidence base for York's Local Plan.

1.2 Strategic Housing Land Availability Assessment

1.2.1 The key function of a SHLAA is to:

- Identify sites with potential for housing;
- Assess their potential for housing; and
- Assess when they are likely to be developed.

1.2.2 A two stage suitability assessment was undertaken to firstly determine the reasonable alternatives to be considered and secondly to identify the sites which have the most potential for development.

1.2.3 This SHLAA provides a comprehensive evidence base for York's Local Plan concerning the suitability, availability and achievability of potential housing land. It identifies potential housing land, and provides a detailed assessment of it, but **does not** make decisions about which sites should be developed. Instead the SHLAA will be used to support decision making about future land allocations and does not pre-judge the strategic approach that the York Local Plan will take. It is for the development plan itself to determine which of the sites are most suitable for allocation. It should also be noted that the information provided in this document is not binding on any future recommendation that may be made by the Council through the planning process.

1.2.4 The results from this report have been used to inform the Local Plan process and identify potential allocations. Further information on the decision for determining sites should be viewed in the reports as set out in Section 2.2 and the Sustainability Appraisal (2018).

1.2.5 The following report outlines the planning context, details the chosen methodology and demonstrates the Council's potential housing supply.

- 1.2.6 This report will be periodically updated to reflect monitoring and receipt of potential sites for development.

1.3 Planning Context

National Planning Policy Framework

- 1.3.1 The National Planning Policy Framework (NPPF) sets the planning policies for England and how these are expected to be applied. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities¹.
- 1.3.2 Section 6 of the NPPF “Delivering a wide choice of high quality homes” specifically sets out the requirement to boost the supply of housing. It identifies that Local Planning Authorities should identify the need for housing, key sites critical to the delivery of the housing strategy and deliverable sites sufficient to meet 15 years of supply. It also requires consideration for locally appropriate housing density and that viability of development is understood.
- 1.3.3 The following paragraphs set out the statements most relevant to this SHLAA:

Para 47²:

To boost significantly the supply of housing, local planning authorities should:

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
- identify and update annually a supply of specific deliverable¹¹ sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;

¹ Paragraph 1, National Planning Framework (2012)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

² Paragraph 47, National Planning Policy Framework (2012)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

- identify a supply of specific, developable 12 sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
- for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and
- set out their own approach to housing density to reflect local circumstances.

Para 48:

Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.

Para 49:

Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.

Para 52:

The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.

Para 154:

Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where.

Para 157:

Allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;

Para 158:

Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

Para 159:

Establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

Para 173:

Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

Para 174:

Assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle. Evidence supporting the assessment should be proportionate, using only appropriate available evidence.

Para 177:

It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan. Any affordable housing or local standards requirements that may be applied to development should be assessed at the plan-making stage, where possible, and kept under review.

Flood Risk Sequential Test

- 1.3.4 Paragraphs 100-104 of NPPF set out a sequential, risk based approach to the location of development to avoid people and property being exposed to the risk of flooding and to manage any residual risk. An important step in the sequential approach to flood risk is the application of a sequential test to proposals for development in areas at risk of flooding, which examines whether there are alternative sites less at risk of flooding that would be appropriate for the proposed development.
- 1.3.5 If, following the Sequential test, the council considers that there are no reasonably available sites in areas less at risk of flooding that would be appropriate for the proposed development, then the Sequential test is passed. It may be appropriate for the proposed development to proceed subject to a site-specific flood risk assessment and appropriate mitigation measures to ensure that the development is made safe for its lifetime without increasing flood risk elsewhere.
- 1.3.6 The National Planning Practice Guidance (NPPG) builds upon the guidance in the NPPF. Paragraph 018 (Reference ID: 7-018-20140306) sets out the sequential, risk based approach to the location of development. It states that the aim should be to keep development out of medium and high flood risk areas (flood zones 2 and 3) and other areas affected by other sources of flooding where possible.
- 1.3.7 Paragraph 019 (Reference ID: 7-019-20140306) sets out the aim of the sequential test. It states that the flood zones as defined in the Strategic Flood Risk Assessment (SFRA) provide the basis for applying the test. The aim is to steer new development to flood risk 1 (areas with a low probability of river or sea flooding). Where there are no reasonably available sites in flood zone 1, local planning authorities in their decision making should take into account the flood risk vulnerability of land uses and consider reasonably available sites in flood zone 2 (areas with a medium probability of river or sea flooding), applying the exception test if required.

National Planning Practice Guidance

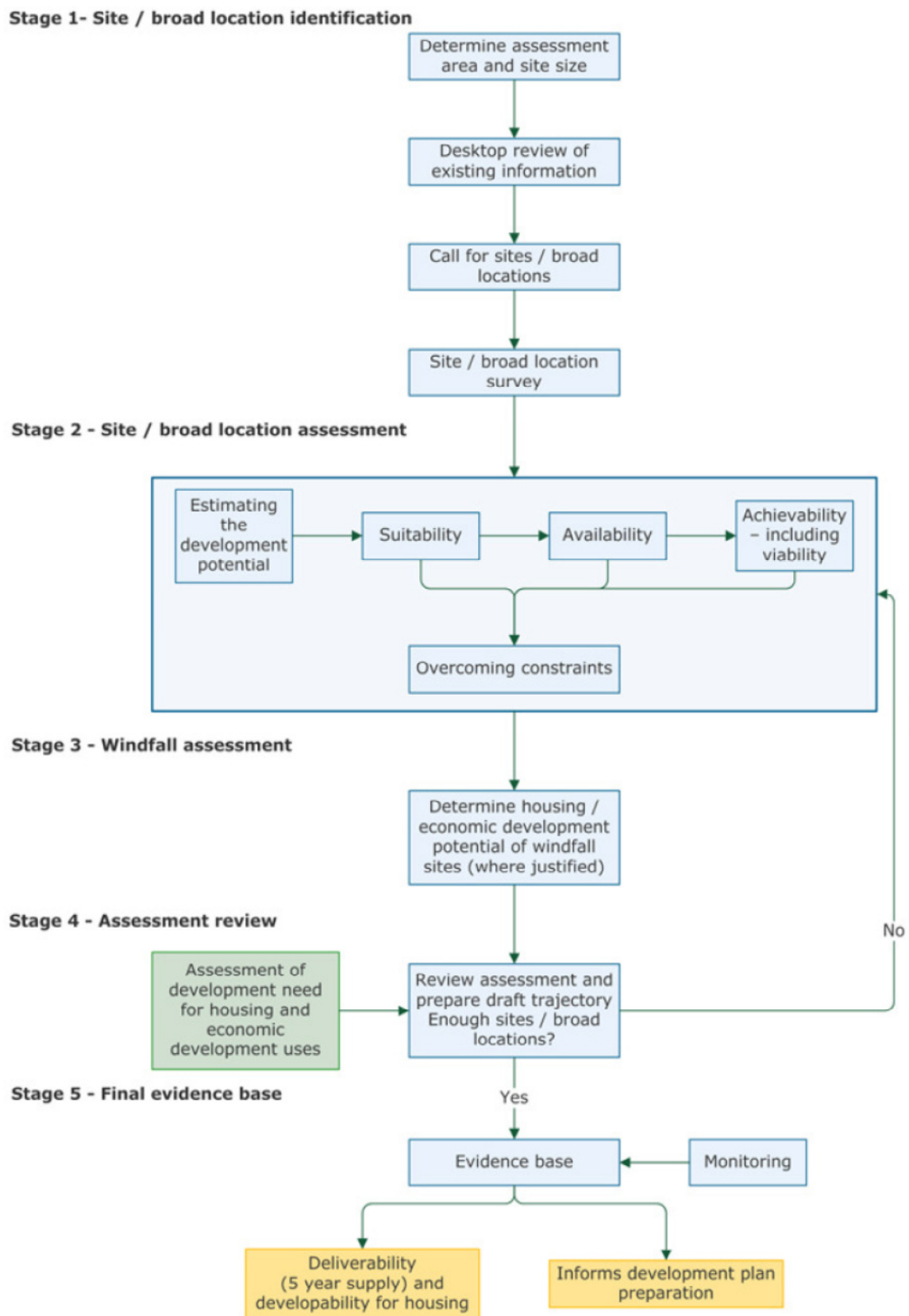
- 1.3.8 The NPPG provides further guidance on preparing Housing Land availability assessments. This clarifies that the purpose of an assessment of land availability should identify a future supply of land which is suitable, available and achievable for housing development use over the plan period.
- 1.3.9 The NPPG proposes a staged methodology for undertaking the assessment as per Figure 1. Plan-makers are required to have regard to this methodology in preparing their SHLAA to ensure a robust assessment is undertaken. The

approach taken by City of York Council conforms to this process. For ease, and comparability, this is set out in the Table 1.

Table 1: Compliance with NPPG methodology

NPPG Methodology	SHLAA Report
Stage 1: Site / Broad location identification	Section 2: Methodology
Stage 2: Site / Broad location assessment Estimating the development potential Suitability Availability Achievability/viability Overcoming constraints.	Section 2: Methodology Section 3: Suitability outcomes and Annex 2 Section 4: Housing Supply and trajectory and Annexes.
Stage 3: Windfall assessment (where justified)	Annex 4: Windfall Paper
Stage 4: Assessment Review	Section 4: Housing Supply an trajectory
Stage 5: Final evidence base	This report

Figure 1: National Planning practice Guidance Methodology Flow Diagram



Source: National Planning Practice Guidance, Housing and Economic Land Availability Assessment. <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/methodology-flow-chart/>

1.4 Local Context

York's Local Plan

- 1.4.1 The production of the emerging Local Plan started in 2012 using previous work undertaken for the development of the Core Strategy as a baseline to move forward. The objective of the new Local Plan was to include Strategic policies and development management policies alongside strategic and other sites allocations to meet the development needs of the city.
- 1.4.2 The Local Plan Preferred Options went out for public consultation in summer 2013 with accompanying evidence base. This included a Site Selection Paper detailing the sites which has passed our criteria and technical officer assessment. Further site submissions were received as part of this consultation and therefore a Further Sites Consultation was held in June 2014 setting out our assessment of sites. See section 2.2 for more information on Local Plan consultation and engagement.
- 1.4.3 A Local Plan Publication draft was approved for consultation in September 2014 by Members at Local Plan Working Group and Executive. However, this consultation was halted following a decision at Full Council in October 2014 to pursue further work in relation to housing numbers.
- 1.4.4 In July 2016 the Council held a Preferred Sites Consultation (PSC)³ that set out the revised housing and employment requirements as well as the portfolio of sites to meet the identified need.
- 1.4.5 The Ministry of Defence announced as part of its Defence Estate Strategy on 7th November 2016 the release of 3 sites in York:
- Imphal Barracks, Fulford Road
 - Queen Elizabeth Barracks, Strensall
 - Towthorpe Lines, Strensall
- 1.4.6 The outcome from the 2016 consultation and the new sites identified by the MOD are considered as part of this technical document.
- 1.4.7 A draft SHLAA was consulted on as part of the Pre Publication Local Plan (Regulation 18) consultation (2017). Previous work has been undertaken relating to the SHLAA in both 2008 and 2011. In addition the Council has released a Strategic Housing Market Assessments (SHMA) (2016, updated 2017). The SHMA documents are available on the Council's website via:
<http://www.york.gov.uk/localplan>.

³ https://www.york.gov.uk/downloads/download/3333/local_plan_preferred_sites_consultation_documents

2 METHODOLOGY

2.1 Developing our Approach to Site Selection

- 2.1.1 The site selection process is iterative and draws on both general and site specific evidence. It is a resource intensive process which requires careful management to ensure the right balance is struck between the level of detail required to make effective choices and losing sight of the choices to be made through the process being overwhelmed with detail. This is described in NPPF as taking a proportionate approach.
- 2.1.2 The iterative process has allowed several stages of site identification and consultation to take place and enabled feedback on the methodology and (re)appraisal of each site. The same sieving process has been used throughout to ensure that all sites taken forward for further consideration have been subject to an equal level of scrutiny, whether they are retesting existing proposals or testing a new proposal which have arisen from consultation. As a result of this, site identification has followed an extensive consultation and engagement process as well as a rigorous assessment of sites.

Geographical Scope

- 2.1.3 The SHLAA considers land within the York Local Authority boundary. Although the Government's Localism agenda promotes collaborative approach under 'duty-to-cooperate', it would be out of York's control to influence allocations in neighbouring authorities. The decision was therefore made to retain the authority boundary as the basis for identifying sites.

2.2 Stages of Site Identification and Consultation/Engagement

- 2.2.1 The SHLAA is essentially a database of sites which have been assessed for their potential for housing. As part of the process to identify sites, we have undertaken a number of stages of consultation through which land has been submitted to be considered for its potential for development purposes. The following sources of supply have been considered:
- Site submitted through the "Call for Sites" consultation and subsequent Local Plan consultations;
 - Extant Housing and Employment planning permissions;
 - Former allocations which have not been developed out.

Call for sites Consultation (2012)

- 2.2.2 The Council did an initial 'Call for Sites' in 2008, which was refreshed in 2012. The 2012 'Call for Sites' consultation asked landowners, developers, agents and the public to submit sites which they thought had potential for development over the next 15-20 years. The consultation ran from 29th August to 12th October

2012 and required a response form and OS map to be submitted to gain consistent information for each site regarding its suitability, availability and deliverability.

- 2.2.3 There were nearly 300 individual site submissions during the consultation period to be considered for a range of development purposes.

Preferred Options Consultation (2013)

- 2.2.4 The Site Selection Paper (SSP)⁴ was published alongside the Local Plan Preferred Options for consultation in summer 2013. The SSP published the results of the analysis of sites submitted through the Call for Sites consultation (2012) and previously identified sources. In total, analysis for 732 parcels was presented.
- 2.2.5 In response to the Preferred Options we received comments on both sites identified as having potential for development as well as those which were rejected. In addition, we received alternative parcels of land as well as further evidence and requests for boundary changes to allocated sites in the Preferred Options document. To ensure consistency, all newly submitted sites were taken through the same methodology to identify their potential for development purposes. In addition, the boundary changes and evidence received on all sites has been reviewed and, where applicable, taken back to Technical Officers to for a further response.

Strategic Sites Delivery Framework (2013)

- 2.2.6 Following the Preferred Options consultation it was recognised that further information was required for Strategic Sites in order to achieve the requirements of the NPPF in relation to viability and deliverability. A framework was devised for the Council to work with developers/landowners, which sets out key milestones leading up to the submission of the Local Plan for examination and the proportionate evidence base that is required to prove that the site should be contained within the Plan.
- 2.2.7 The level of detail required by the checklist is influenced by when the site will be delivered – for sites proposed for delivery within the first five years, confidence on delivery will need to be greater. The framework intended to give a general understanding of what we will need by when and assist the Council during plan preparation to ensure there is a robust evidence base to support the Local Plan.
- 2.2.8 This framework was presented to the Local Plan Working Group on 4th November 2013 and agreed as an approach for taking forward Strategic Sites.

⁴ Site Selection Paper:

https://www.york.gov.uk/downloads/download/1197/local_plan_preferred_options_supporting_documents

Strategic Site Framework	Stage 1	Stage 2	Stage 3	Stage 4
	<p>Confirming the principle</p> <p>We need a general understanding of what your site will deliver and for you to confirm that this site should be included within the plan.</p> <p>We need to know that the landowner/developer is willing</p>	<p>Review</p> <p>We need to have confidence that the site can stay in the Local Plan.</p> <p>We need to understand and agree when the site can potentially be delivered</p> <p>We need to know how any 'showstoppers' can be dealt with</p>	<p>Pre-submission</p> <p>Where the site is to be delivered early on in the plan period, we will need to know the site is deliverable and viable. In other cases, we will need to know how we will work towards delivery</p> <p>We need to know when and what you are going to deliver</p>	<p>Submission and beyond</p> <p>We need you to submit your evidence to prove deliverability. For early deliverable sites we will need to demonstrate site viability and for others, an indication of what issues are outstanding</p> <p>Preparation of an outline application / early delivery</p>
<p>Checklist for this stage:</p> <ul style="list-style-type: none"> ✓ Set out the vision and aims for your site ✓ Explain the relationship to the Local Plan Vision ✓ Confirm that the Landowner/ developer is proved to be willing and working together for delivery ✓ Demonstrate you are aware of any Potential 'showstoppers' or critical issues affecting deliverability, inc. viability ✓ Set out potential levels and timescale of delivery; i.e. indicative numbers, phasing, density 	<p>Checklist for this stage:</p> <ul style="list-style-type: none"> ✓ Likely trajectory for delivery inc. phasing and delivery ✓ An understanding of general, key infrastructure requirements for the site ✓ An understanding of key constraints and potential 'showstoppers' and critical issues ✓ Addressing issues raised through Local Plan Preferred Options Consultation 	<p>Checklist for this stage:</p> <ul style="list-style-type: none"> ✓ 'Showstoppers' are capable of being addressed within the timescales set out for delivery ✓ Delivery trajectory and phasing is understood ✓ Where sites are coming forward early in the plan period: <ul style="list-style-type: none"> ○ An indication of high level viability. ○ An indicative concept plan ✓ For sites proposing delivery later in the period: we will need a general 'route map' to delivery of how key issues will be addressed 	<p>Checklist for this stage:</p> <ul style="list-style-type: none"> ✓ Evidence to include: <ul style="list-style-type: none"> ○ Aims and objectives ○ Identification and mitigation of show-stoppers ○ Land-uses and proposals ○ Infrastructure needs ○ Phasing and delivery ○ Implementation route map and key milestones <p>NB: the level of detail required in relation to the above will depend on when the site is likely to come forward.</p>	

Further Sites Consultation (2014)

- 2.2.9 The Further Sites Consultation (FSC) ⁵ in summer 2014 was a focussed consultation presenting the outcomes and seeking views on the new proposals/changes to potential allocated sites as a result of the Preferred Options Consultation and evidence received through the Strategic Sites Delivery Framework.
- 2.2.10 Additional information analysed or received was published as part of an Addendum for committee purposes in September 2014 alongside the halted Local Plan Publication draft (2014); the outcomes of which feed into the overall site selection process within this document and the Strategic Housing Land Availability Assessment.

Preferred Sites Consultation (2016)

- 2.2.11 The Preferred Sites Consultation (PSC) ⁶ set out the updated housing and employment requirements and presented a preferred portfolio of sites to meet the demand. The allocations set out in the halted Local Plan Publication draft formed the starting point for the consideration of suitable sites given they had already been through the site selection methodology.
- 2.2.12 Further sites, evidence base and boundary amendments were received as part of the PSC consultation. These responses were analysed in line with the methodology and following further technical officer comments where necessary. Officers took the outcomes of this work together with the sites highlighted for release by the MOD, including officers suggestions for site allocations, to Members of Local Plan Working Group (10th July 2017) and Executive (13th July 2017). Outcomes of this are referenced in Annex 6 to this report.
- 2.2.13 The Executive resolution was to proceed to Pre-Publication Consultation with predominantly the site boundaries and quantum set out at the Preferred Sites Consultation stage (2016). However, Members also resolved to include the new MOD sites at Strensall and Fulford and minor changes to sites, where suggested. The minutes of this meeting outlining the decision made by Members⁷ is available online.

⁵ Further Sites Consultation documents:

https://www.york.gov.uk/downloads/download/1133/further_sites_consultation_report_2014_and_technical_appendices

⁶ Preferred Sites Consultation documents:

https://www.york.gov.uk/downloads/download/3333/local_plan_preferred_sites_consultation_documents

⁷ Executive 13th July 2017 (item 112):

<http://democracy.york.gov.uk/ieListDocuments.aspx?CIId=128&MIId=10364&Ver=4>

Pre-Publication Local Plan (Regulation 18) Consultation (2017)

- 2.2.14 The Pre-Publication Consultation commenced on 18 September to Monday 30 October 2017. This consultation presented the full plan, including the site allocations. As part of this consultation a SHLAA (Sept 2017) was published incorporating the outcomes of the July 2017 Executive for housing sites.
- 2.2.15 Comments and site submissions received through this consultation were processed and considered against previous submissions. The outcomes were taken to Member committees for consideration in January 2018 as part of the Publication draft Local Plan.

2.3 Determining Suitability and Reasonable Alternatives

- 2.3.1 In order to sieve out the potential sites most suitable for development, a two stage suitability process was undertaken, comprising:

- Stage 1: Sustainable Location Assessment
- Stage 2: Technical Officer Group

Site Threshold

- 2.3.2 The site threshold of 0.2ha was set in SHLAA Phase 1 (Strategic Land Availability Assessment Phase 1, CYC, April 2008) and used in SHLAA phase 2 (SHLAA Phase 2, CYC, September 2011). This is in line with SHLAA guidance⁸, which advises that authorities should recognise the potential of smaller sites. This threshold of 0.2ha is lower than the proposed threshold of 0.25ha proposed in the NPPG.
- 2.3.3 This lower threshold is used by the Council to recognise the high level of small sites historically developed in York and to proactively attempt to identify as many sites as possible. Sites submitted below this threshold or which were below 0.2ha after the criteria 1, 2 & 3 assessment were then removed from further assessment.

Stage 1: Sustainable Location Assessment

- 2.3.4 The emerging Spatial Strategy in the Local Plan sets out the key shapers for development to ensure development is focussed in the most suitable and sustainable locations in York whilst respecting the city's unique assets. The Site Selection Methodology uses the shapers set out in the emerging Spatial Strategy

⁸ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

to assess potential site suitability. This methodology was also informed by work on the Sustainability Appraisal (SA), which sets an appraisal methodology to assess whether the Local Plan fits with sustainability aspirations both nationally and locally.

2.3.5 Stage 1 was a desktop assessment using GIS based data to accurately determine the site's location relative to the criteria.

2.3.6 All of the sites have been tested against the site selection methodology which is designed around a 4 stage criteria based approach as follows:

Criteria 1- 3: Environmental Assets

2.3.7 The character and form of York provide an overarching narrative for the factors which shape growth and the choices we make in how we accommodate the growth. The following environmental criteria are therefore used to assess suitable locations for growth:

- Criteria 1: Environmental Assets, including:
 - Historic Character and Setting Areas identified important to York's character and setting;
 - European, national and locally designated Nature Conservation Sites;
 - Regional Green Corridors;
 - Ancient woodlands;
 - Functional Floodplain (flood zone 3b).
- Criteria 2: Retaining existing open space where needed;
- Criteria 3: Minimising greenfield development in areas of high flood risk (flood zone 3a).

2.3.8 Figure 2 shows the Criteria 1 Environmental Assets in combination to illustrate the combined area considered, which should be protected from future development. At each stage of the assessment sites were removed from the assessment process if they failed the criteria in their entirety or, if only part of the site was shown in an environmental asset, the site size was reduced to exclude the part of the site that fell within this asset.

Criteria 4a: Access to Services and Facilities

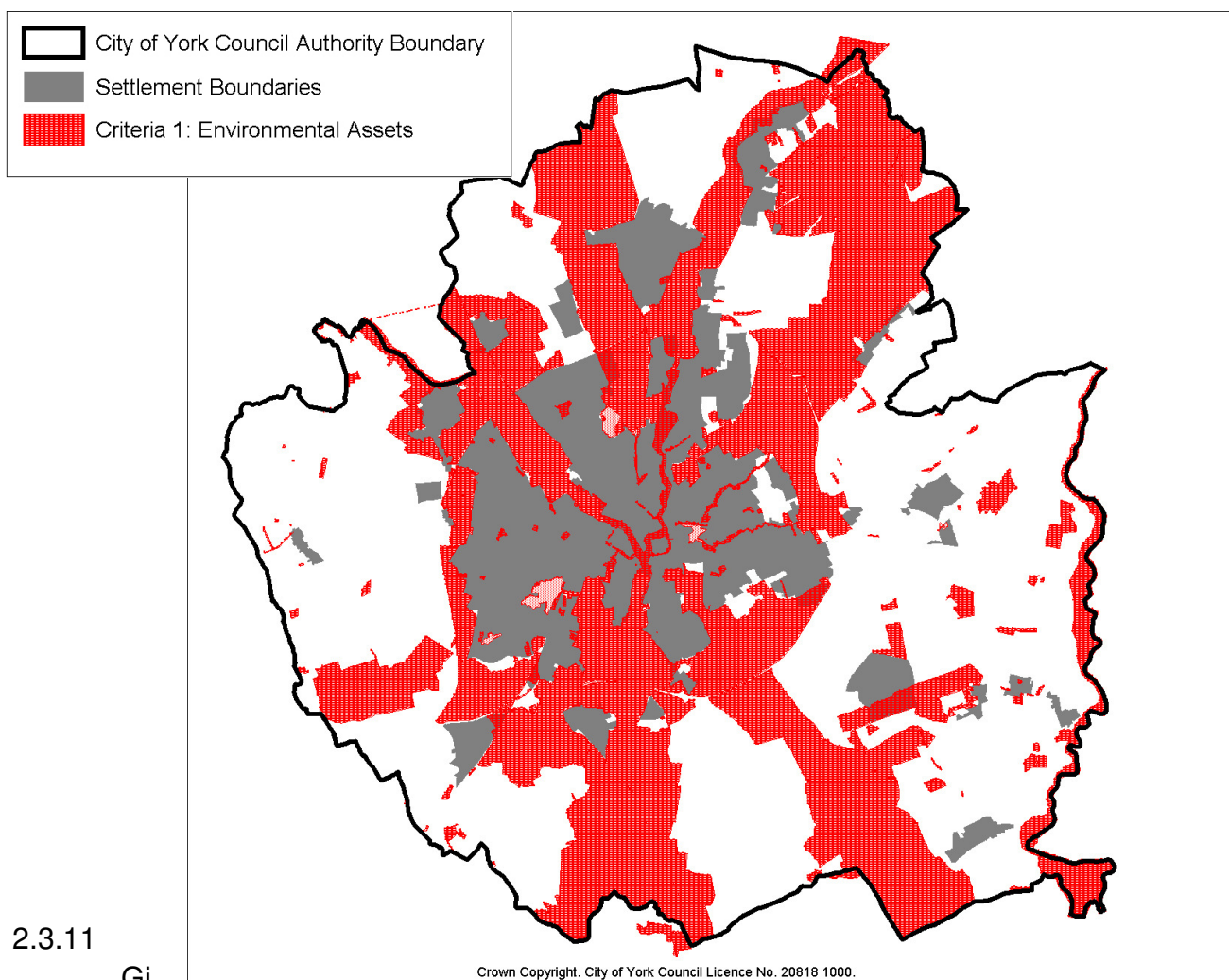
2.3.9 York is a compact city with a relatively extensive public transport system in relation to its size and good provision of community facilities. The location and design of development can play an important role in travel choice to and from destinations and maximising the opportunity to use non car modes of transport. Maximising this potential is essential to accommodate trip growth given the constraints of the local road network and is also an important aspect of creating

sustainable neighbourhoods and contributing to residents' quality of life. In addition ensuring the local provision of and sustainable access to shops, community facilities and open space promotes environmental sustainability as well as social inclusion and health and well-being.

2.3.10 In line with the Local Plan Spatial Strategy it was deemed appropriate that sites, which passed criteria 1-3 were subject to an assessment of proximity to services and to sustainable transport. The services and facilities included within the assessment were:

- Education: Access to a Nursery, Primary school, Secondary school, Higher and Further Education;
- Convenience provision: access to a neighbourhood parade containing a convenience store (incl. Butchers, greengrocers etc or supermarket), access to a supermarket, access to a doctors;
- Openspace: Number of openspaces within required distances (as defined in the Council's Open Space Study, 2014, updated 2017).

Figure 2: Criteria 1 (Environmental Assets) combined



2.3.11

Gi

ven the compact nature of York and its population, the majority of the built sport and leisure facilities are provided for citywide use and therefore there is an expectation that people would travel further to these facilities. Due to this, leisure facilities were not included in the assessment criteria. Other community facilities that serve day-to-day

Criteria 4b: Transport Accessibility

- 2.3.12 Similarly to criteria 4a, accessible sustainable transport is important to addressing York's travel challenges and has both social and environmental advantages. Furthermore, taking advantage of non car modes of transport also helps to capitalise on these benefits whilst maximising the opportunities for the economy through ensuring an accessible workforce and employment destinations. It was deemed appropriate to include an assessment of proximity to different modes of transport.
- 2.3.13 The transport accessibility includes the following assessment criteria:
- Access to buses (Park & Ride, frequent and non-frequent routes);
 - Access to the train Station (walking and cycling);
 - Access to cycle routes;
 - Access to an adopted highway (A, B, Minor or Local road).

Minimum Scoring for Site Selection

- 2.3.14 In order to sieve out the most sustainable site options a minimum site score threshold based on access to essential services and transport was applied. Sites over 35 hectares are anticipated to be capable of providing facilities and transport connections. Given this assumption, where these sites do not pass the site scoring, they were still taken forward for consideration by technical officers.
- 2.3.15 The full methodology, including more detail on the constraints, a flow diagram demonstrating the process and scoring mechanism, can be found in Annex 2 to this report.

Stage 2: Technical Officer Group

- 2.3.16 The sites which successfully passed stage 1 of the suitability assessment are considered as reasonable alternatives (for the purposes of Sustainability Appraisal). These sites were taken to a Technical Officer Group consisting of experts from around the Council to understand more site specific suitability and determine whether the site should progress as a potential development site. The Group included colleagues from:

- Conservation, Design and Sustainable Development;
- Transport and Highways;
- Environmental Protection; and
- Economic development.

Consideration of Supporting Evidence

2.3.17 Sites which were wholly or partly removed from the site selection process following the criteria 1-3 analysis were given the opportunity to respond to the assessment with supporting evidence. Any evidence submitted through consultations, which challenged the designation of the primary constraints or conclusions on a site were considered by the Technical Officer Group. The results of this were previously published as part of the Site Selection Paper (2013), Further Sites Consultation (2014), Site Selection Paper Addendum (2014) and Preferred Sites Consultation (PSC) (2016). In addition, consideration of technical evidence submitted through the PSC consultation and for the MOD sites was published for Executive in July 2017. This was consulted on as part of the SHLAA (2017) during the Pre Publication Local Plan (Regulation 18) consultation (2017).

2.4 Emerging guidance post assessment

2.4.1 Since developing the site selection process and criteria assessment in 2013 further guidance and best practice has emerged, which need to be taken into consideration.

Natural England - Impact Risk Zones for SSSIs

2.4.2 Natural England have defined zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. This is a GIS based tool/ dataset which is updated regularly in line with reviews of impacts on the SSSIs.

2.4.3 Local Planning Authorities have a duty to consult Natural England before granting planning permission on any development that is in or likely to affect a SSSI. The IRZs can be used by LPAs to consider whether a proposed development is likely to affect a SSSI and determine whether they will need to consult Natural England to seek advice on the nature of any potential SSSI impacts and how they might be avoided or mitigated.

2.4.4 In addition, the IRZS include effects on European designated sites where these objectives are different to the SSSI. The IRZs can therefore be used to inform Habitat Regulation Assessments to determine likely significant effect from

particular types of development on the interest features of a European designated site. The SSSI IRZs also cover "Compensation Sites" which have been secured as compensation for impacts on Natura 2000/Ramsar sites. Each Compensation Site has been given the same IRZs as the Natura 2000/Ramsar site(s) it is providing compensation for.

- 2.4.5 Given that this is a tool that could provide further information on the potential impacts on European nature conservation sites and SSSIs, all of the sites which have passed the criteria assessment have been re-evaluated against the IRZs to understand whether housing development would have a potential impact on the nature conservation designation. The outcomes of this work have fed into the overall assessment.

Flood risk

- 2.4.6 The environment agency periodically updates the flood risk data for which is used to underpin the York Strategic Flood Risk Assessment (SFRA) for York. This evidence base has fed into the overall site assessment to ensure that development is excluded from the most high risk zones.
- 2.4.7 The Environment Agency has updated their baseline data in York as a result of reviewing the River and Ouse and River Foss. This data will feed into an updated SFRA in due course. In the meantime sites have been tested against the new baseline data from the EA in conjunction with colleagues in Flood Risk Management to understand whether there would be any impact on the site selection process.

Agricultural Land Value

- 2.4.8 The National Planning Policy Framework paragraph 112 states:

“Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.”

- 2.4.9 Further consideration of Agricultural land was included in the consideration of potential sites for development at the Preferred Sites Consultation stage (2016) and is considered within the Sustainability Appraisal of the plan for reasonable alternative sites.

2.5 Determining Availability of a site

- 2.5.1 The majority of sites assessed were received through the Call for Sites process or subsequent Local Plan consultations. Through this process we asked that landowner details were provided to us to ensure that we could confirm availability and that the site had a willing landowner. We also asked for details of whether the site had been promoted commercially or by an agent as well as when the site would be become available for development. Since 2012, the availability of sites has been reconfirmed through consultation.
- 2.5.2 For the allocated sites set out in the Section 3.3, availability of the site has been confirmed and the timescales reflect our understanding of when the site will be brought forward in the plan period.

2.6 Determining Deliverability of a site

- 2.6.1 It is important to establish how much a proposed site for development could deliver within the timescale of the Local Plan. In order to understand this in relation to sites taken forward we have used the following assumptions to calculate housing numbers.
- 2.6.2 Paragraph 173 of the NPPF advises that cumulative effects of planning policy should not combine to render plans unviable and that sites that appear in the plan should be viable. Paragraph 174 of the NPPF also creates two concepts of ‘deliverability’ (which applies to sites which are expected in Years 0-5 of the plan) and “developability” (which applies to year 6 onwards of the plan).
- 2.6.3 It is important to define these terms.
- To be deliverable, *“sites should be available now, offer a suitable location for development now, and be achievable, with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.”*
 - to be developable, sites expected in Year 6 onwards should be able to demonstrate a *“reasonable prospect that the site is available and could be viably developed at the point envisaged”*.
- 2.6.4 The NPPF therefore advises that a more flexible approach may be taken to the sites coming forward in the period after the first five years. Sites coming forward after Year 6 might not be viable now – and might instead be only viable at that point in time. This recognises the impact of economic cycles and policy changes over time.

2.6.5 The approach to deliverability has taken into consideration the size of the potential development and the following assumptions. Evidence to support these assumptions is set out in more detail within Annex 5 to this report.

Density assumptions

2.6.2 The Local Plan Viability Study (draft 2014, updated 2018)⁹ set out an archetype approach to determining housing numbers on sites less than 5ha (Non-strategic sites).

2.6.3 The following archetypes have therefore been used to determine the scale of potential development on a site and to give an estimated yield on non-strategic sites:

Table 2: Archetypes used for density assumptions

Area	Site Type	Dwelling no	Gross Site Size	Gross:Net Ratio	Net Site Size	Density
City Centre/ City Centre Extension	Large	95	1ha	95%	0.95ha	100dph
	Medium	50	0.5ha	100%	0.5ha	100dph
	Small	20	0.2ha	100%	0.2ha	100dph
Urban	Large	45	1ha	95%	0.95ha	50dph
	Medium	25	0.5ha	100%	0.5ha	50dph
	Small	10	0.2ha	100%	0.2ha	50dph
Suburban	Large	140	4ha	70%	3.5ha	40dph
	Medium	38	1ha	95%	0.95ha	40dph
	Small	8	0.2ha	100%	0.2ha	40dph
Village/Rural	Village	122	5ha	70%	3.5ha	35dph
	Large	33	1ha	95%	0.95ha	35dph
	Medium	7	0.2ha	100%	0.2ha	35dph
	Small	1	0.05ha	100%	0.05ha	35dph

2.6.3 The archetypes use indicative dwellings mixes of potential development scenarios coming forward to assume that this is reflective of the nature of future development in York.

⁹ https://www.york.gov.uk/downloads/download/1231/further_published_evidence

2.6.4 For strategic sites (over 5ha) a predominantly bespoke approach is taken to reflect the site characteristics and detailed work undertaken (see Table 3).

Table 3: Archetypes used for Strategic Sites

Allocation Reference	Site Name	Site size (ha)	Estimated Yield	Archetype/Density
ST1	British Sugar/Manor School	46.3	1200	Yield and density assumptions taken from pending planning application: 15/00524/OUTM
ST2	Civil Service Sports Ground Millfield Lane	10.4	266	Yield and density assumptions taken from pending planning application: 14/02979/FULM
ST4	Land Adjacent to Hull Road	7.54	211	Yield and density assumptions taken from pending planning application: 15/00166/FULM & 15/00167/FULM
ST5	York Central	35	1700	Densities range between 95-125 dph across the residential area of the site for a scheme delivering 1,700 homes, with 1,500 units in the plan period and are based on emerging masterplanning. These are net densities excluding strategic open space.
ST7	Land East of Metcalfe Lane	34.5	845	Strategic Site – 70% net site area at 35dph
ST8	Land North of Monks Cross	39.5	968	Village/rural exceptional archetype (70% @ 35dph)
ST9	Land North of Haxby	35	735	Strategic Site – 60% net site area at 35 dph
ST14	Land West of Wigginton Road	55	1348	Strategic Site – 70% net site area at 35dph
ST15	Land West of Elvington Lane	159	3339	New Settlement (60% @ 35dph)
ST16	Terry's Extension Site – Terry's Clock Tower (Phase 1)	2.18	22	N/A - Dwelling number taken from approved application (16/01646/FULM)
ST16	Terry's Extension Site – Terry's Car Park (Phase 2)		33	Suburban medium archetype (95% @ 40 dph)
ST16	Terry's Extension Site – Land to rear of Terry's Factory (Phase 3)		56	Urban large archetype (95% @ 50 dph)
ST17	Nestle South (Phase 1)	2.35	263	Estimated yield is based on previously approved mixed use scheme (10/01960/FULM) which has recently expired.
ST17	Nestle South (Phase 2)	4.7	600	

ST31	Land at Tadcaster Road, Copmanthorpe	8.1	158	Village/rural exception archetype (60% @ 35dph)
ST32	Hungate (Phases 5+)	2.17	328	N/A – Site has existing consent for 720 dwellings and masterplan approved at planning committee for Phase 5+ which will provide up to 305 additional dwellings over and above the original extant scheme.
ST33	Station Yard, Wheldrake	6	147	Village/rural exception archetype (70% @ 35dph)
ST35	Queen Elizabeth Barracks, Strensall	28.8	500	Village/rural exception archetype (50% @ 35dph)
ST36	Imphal Barracks, Fulford Road	18	769	Dwelling numbers are based upon emerging masterplan through developer submission.

Lead-in times and build out rates

2.6.5 The approach to lead-in times has been influenced by the information and evidence received from land owners/agents involved with specific individual sites, information collated through our housing implementation survey, historic housing delivery rates achieved within the authority area and industry reports covering stock and flow relating to planning permissions and housing output. This is set out in more detail in Annex 5.

2.6.6 It is acknowledged that each individual housing site is unique in terms of size, capacity, topology and access. All of these factors can determine potential housing delivery rates and need to be taken into account when estimating lead in times, phasing and potential annual delivery rates that feed into the housing trajectory.

Build out rates

2.6.7 Based upon the evidence base set out in Annex 5 it is considered appropriate to standardise the build-out rates applied to site allocations to 35 dwellings per outlet per annum and apply this in multiples as the number of outlets are likely to increase. It is envisaged that the largest schemes may have up to 4 outlets after the initial infrastructure phase has been completed.

Lead-in times

2.6.8 The Housing Implementation Study results reveal that the majority of respondents identified that smaller –medium sites are more likely to come

forward within 12 months, where as, larger and exceptionally large sites are more likely to be 12-18 months at a minimum.

- 2.6.9 It, therefore, seems appropriate that larger schemes have a longer lead-in time, particularly if significant infrastructure is required on site

Viability

- 2.6.13 In respect of development costs, NPPG states that the assessments should be based on robust evidence, reflect local market conditions and include all costs of development including:

- build costs;
- known abnormal costs;
- infrastructure costs;
- the cumulative costs of policy requirements and standards;
- finance costs; and
- professional, project management, sales and legal costs.

- 2.6.14 Viability work for the Local Plan is presented for the site allocations in the Viability Assessment (2017) and Viability Assessment update (2018). This update report builds on the work undertaken for the Council by Peter Brett Associates (PBA), who undertook a viability assessment of the Pre-Publication Draft Regulation 18 Local Plan Consultation document (PPDRC 2017), along with an assessment of introducing Community Infrastructure Levy (CIL) charges within the City. This report updates the work undertaken by PBA to account for the proposed changes in the number of houses being planned following the consultation on the PPDRC 2017. In doing so, this report has revised the testing based on two main changes, which are:

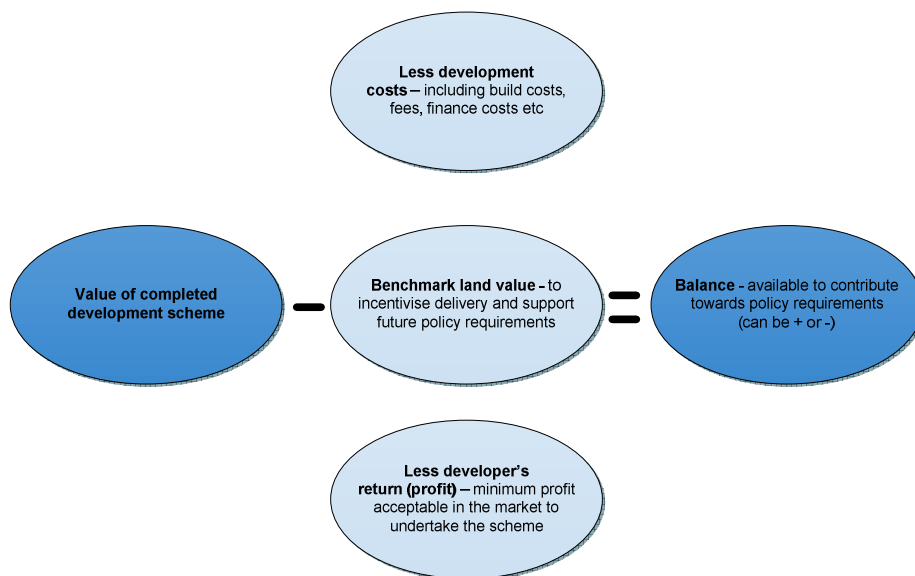
- a set of general sites typologies that better reflect likely sites to come forward as previously tested in a viability assessment undertaken in 2014.
- revisions to the strategic site areas and potential yields (residential units).

- 2.6.15 It should be noted that the approach, methodology and assumptions used in testing the findings in this report remain the same as those described and used in previous reports, where this remains relevant.

- 2.6.16 The viability testing and study results are based on establishing a residual land value for different land uses relevant to different parts of the Local Plan area. The approach takes the difference between development values and costs, and compares the 'residual value' (i.e. what is left over after the cost of building the site is deducted from the potential sales value of the completed site/buildings) with a benchmark/threshold land value (i.e. the value over and above the existing use value a landowner would accept to bring the site to market for

development) The costs include allowances for policy requirements as illustrated in Figure 3

Figure 3: Approach to residual land value assessment for whole plan viability



- 3.3.1 The Local Plan Viability Study (2018) testing results imply that the cumulative impact of the policies in the Publication draft Local Plan (2018) document do not put implementation of the emerging plan at serious risk.
- 3.3.2 It is concluded that in accordance with the National Planning Policy Framework (NPPF) paragraph 173, the Publication draft Local Plan (2018) would not unduly burden the delivery of residential and non-residential development in the City of York Housing Supply and Trajectory. Please see the main viability study for more detail available from www.york.gov.uk/localplan.

3 OUTCOMES OF ASSESSMENT

3.1 Suitability

3.1.1 A total of 860 parcels of land have been considered for their suitability for residential use. This number includes all boundaries, including superseded and alternative boundaries submitted. The outcomes of the criteria assessment are summarised below. See Annex 2 for the detailed site-by-site suitability assessment.

Total number of Housing Parcels assessed	860 parcels*
Under Threshold (when submitted)	231 parcels
Criteria 1-3: Environmental Assets assessment	194 parcels – Failed criteria 435 parcels –passed and went on to criteria 4
Criteria 4: Access to services and transport assessment	84 parcels – Failed criteria 228 parcels – passed stage 1 scoring 104 parcels - passed stage 2 scoring 18 parcels - over 35 ha (taken forward) 1 - site withdrawn
Total taken forward for Technical Officer Assessment (Passed criteria 1-4 and over 35 ha)	350 parcels
Parcels removed as undevelopable due to land leftover from application of constraints or superseded /duplicate records.	100 parcels
Parcels Assessed as ‘reasonable alternatives’	250 parcels These 250 parcels were deemed reasonable alternatives to be taken forward for Sustainability Appraisal. See Annex 6

* 1 parcel discounted as outside of authority boundary.

- 3.1.2 Out of the 860 parcels, 52 parcels were over 35 hectares. Given the size of these sites it is anticipated that they are capable of providing facilities and transport connections. Given this assumption, where these sites do not pass the site scoring, they were still taken forward for consideration by technical officers. Out of the 52 strategic size parcels:
- 22 parcels passed stage 1 scoring
 - 11 parcels passed stage 2 scoring
 - 18 parcels failed but were taken forward as sites over 5 ha.
 - 1 parcel was withdrawn

3.2 Availability

- 3.2.1 As set out in section 2.5, a key assumption of the site selection process has been whether a sites has a willing landowner. An indication of this is provided in Annex 2 relating to the source of the site.
- 3.2.2 More detailed availability information is set out in Annex 6. This sets out the sites which pass criteria 4 but eliminates sites taken forward for alternative uses and with superseded boundaries (deemed reasonable alternatives sites for the purposes of Sustainability Appraisal). Annex 6 sets out updated understanding regarding availability of the site as at 1st April 2017.
- 3.2.3 Annex 7 also presents the status of unimplemented planning permissions for residential use included in the trajectory (within section 4 of this report).

4 HOUSING SUPPLY AND TRAJECTORY

4.1 Sites with Existing Permissions

4.1.1 We monitor residential planning permissions and completions to ensure we understand how many have been granted consent or brought forward over time to feed into our housing trajectory.

4.1.2 The Housing Monitoring Update (2017) (See Annex 3) identifies the following:

Housing Completions

Between 1st April 2016 and 31st March 2017 there were a total of **977 net**

Completions comprising:

- 571 homes (58.4%) were completed on traditional (use Class C3) housing sites;
- 152 homes (15.6%) were a result of off campus privately managed student accommodation schemes;
- 252 homes (25.8%) were from sites benefitting from relaxed permitted development rights to allow conversion to residential use;
- Changes of use of existing buildings to residential use and conversions to existing residential properties accounted for 564 (57.7%) of all completions, by far the greatest total for at least 20 years; and
- Development sites including Former Terry's Factory site (174), Derwenthorpe (76), Our Lady's RC School (55) Former Grain Stores Water Lane (50), and Windy Ridge/Brecks Lane, Huntington (40) all contributed much needed new housing stock over the monitoring period.

Housing Consents

4.1.3 Net housing consents between 1st April 2016 and 31st March 2017 totalled **451 net additional homes**. This total represents a marked decrease in residential approvals compared to those experienced during the previous three full monitoring years. However, housing consents are still higher compared to those achieved during the recessionary period preceding 2013/14. As at the 1st April 2017 there were extant planning permissions for 3,578 homes which will contribute towards meeting the overall housing requirement in the Plan.

The main features of the consents approved during 2016/17 monitoring period were:

- 243 of all net homes consented (53.8%) were granted on traditional (Use Class C3) housing sites.
- 73 off campus privately managed student accommodation units (16%) were consented; and
- A further 177 net new homes (39.2%) were permitted as a result of relaxed permitted development rights.

4.2 Windfall Allowance

- 4.2.1 Windfalls sites, as defined in the NPPF (2012) are sites which have not been specifically identified as available in the Local Plan process – they normally comprise previously developed sites that have unexpectedly become available. In line with NPPF Local Planning authorities can make an allowance for windfalls if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.
- 4.2.2 In taking a proportionate approach to identifying land for development in the emerging Local Plan only sites above the site threshold 0.2ha have been identified as draft allocations. To ensure that we properly understand the potential for development on very small sites below this allocation threshold an assessment of the trends in the historic rate of windfall delivery along with changes of use and conversions has been carried out. This analysis is set out in Annex 4: City of York Local Plan Windfall Allowance Technical Paper (2017). The annual figure for windfalls is 169 dwellings per annum which is effectively a mean average for these two categories of windfalls calculated over a 10 year period. To avoid double counting and to allow time for sites to continue through the development process, windfalls will be included from year four of the trajectory. Garden infill sites have been removed.

4.3 Allocated Sites in the Publication draft Local Plan (2018)

- 4.3.1 Members of the Council's Executive at the meeting on 13 July 2017 resolved that on the basis of the housing analysis presented, the increased figure of 867 dwellings per annum, based on the latest revised sub national population and household projections published by the Office for National Statistics and the Department of Communities and Local Government, be accepted.
- 4.3.2 Table 4 below presents the sites agreed to meet that need following the consideration of the analysis through the site selection process as documented through this report and annexes. In addition, the housing trajectory associated with that need is summarised Sections 4.4 and 4.5.

Table 4: Housing Allocations in the Publication draft Local Plan (Regulation 19 Consultation)

Allocation Reference	Site Name	Site Size (ha)	Estimated Yield (Dwellings)	Estimated Phasing
H1	Former Gas Works, 24 Heworth Green (Phase 1)	2.87	271	Short to Medium Term (Years 1 - 10)
H1	Former Gas works, 24 Heworth Green (Phase 2)	0.67	65	Medium Term (Years 6-10)
H3**	Burnholme School	1.90	72	Short Term (Years 1 - 5)
H5**	Lowfield School	3.64	162	Short to Medium term (Years 1 - 10)
H6	Land R/O The Square Tadcaster Road	1.53	0*	Short to Medium Term (Years 1 - 10)
H7**	Bootham Crescent	1.72	86	Short to Medium Term (Years 1 - 10)
H8	Askham Bar Park & Ride	1.57	60	Short Term (Years 1 - 5)
H10	The Barbican	0.96	187	Short to Medium Term (Years 1 - 10)
H20	Former Oakhaven EPH	0.33	56	Short Term (Years 1 - 5)
H22	Former Heworth Lighthouse	0.29	15	Short Term (Years 1 - 5)
H23	Former Grove House EPH	0.25	11	Short Term (Years 1 - 5)
H29	Land at Moor Lane Copmanthorpe	2.65	88	Short Term (Years 1 - 5)
H31	Eastfield Lane Dunnington	2.51	76	Short Term (Years 1 - 5)
H38	Land RO Rufforth Primary School Rufforth	0.99	33	Short Term (Years 1 - 5)
H39	North of Church Lane Elvington	0.92	32	Short Term (Years 1 - 5)
H46**	Land to North of Willow Bank and East of Haxby Road, New Earswick	2.74	104	Short Term (Years 1 - 5)
H52	Willow House EPH, Long Close Lane	0.20	15	Short Term (Years 1 - 5)
H53	Land at Knapton Village	0.33	4	Short Term (Years 1 - 5)
H55	Land at Layerthorpe	0.20	20	Short Term (Years 1 - 5)
H56**	Land at Hull Road	4.00	70	Short Term (Years 1 - 5)
H58	Clifton Without Primary School	0.70	25	Short Term (Years 1 - 5)

Allocation Reference	Site Name	Site Size (ha)	Estimated Yield (Dwellings)	Estimated Phasing
H59**	Queen Elizabeth Barracks – Howard Road, Strensall	1.34	45	Medium to Long Term (Years 6 - 15)
ST1**	British Sugar/Manor School	46.3	1,200	Lifetime of the Plan (Years 1-16)
ST2	Civil Service Sports Ground Millfield Lane	10.40	266	Short to Medium Term (Years 1 - 10)
ST4	Land Adjacent to Hull Road	7.54	211	Short to Medium Term (Years 1 - 10)
ST5	York Central	35.0	1,700	Lifetime of the Plan and Post Plan period (Years 1-21)
ST7	Land East of Metcalfe Lane	34.5	845	Lifetime of the Plan (Years 1 - 16)
ST8	Land North of Monks Cross	39.5	968	Lifetime of the Plan (Years 1 - 16)
ST9	Land North of Haxby	35.0	735	Lifetime of the Plan (Years 1 - 16)
ST14	Land West of Wigginton Road	55.0	1,348	Lifetime of the Plan and Post Plan period (Years 1 - 21)
ST15	Land West of Elvington Lane	159.0	3,339	Lifetime of the Plan and Post Plan period (Years 1 - 21)
ST16	Terry's Extension Site – Terry's Clock Tower (Phase 1)	2.18	22	Short Term (Years 1-5)
ST16	Terry's Extension Site – Terry's Car Park (Phase 2)		33	Short to Medium Term (Years 1 – 10)
ST16	Terry's Extension Site – Land to rear of Terry's Factory (Phase 3)		56	Short to Medium Term (Years 1 – 10)
ST17	Nestle South (Phase 1)	2.35	263	Short to Medium Term (Years 1 - 10)
ST17	Nestle South (Phase 2)	4.70	600	Medium to Long Term (Years 6 – 15)
ST31	Land at Tadcaster Road, Copmanthorpe	8.10	158	Short to Medium Term (Years 1-10)
ST32	Hungate (Phases 5+)	2.17	328	Short to Medium Term (Years 1-10)
ST33	Station Yard, Wheldrake	6.0	147	Short to Medium Term (Years 1-10)
ST35**	Queen Elizabeth Barracks, Strensall	28.8	500	Medium to Long Term (Years 6-15)
ST36**	Imphal Barracks, Fulford Road	18.0	769	Post Plan period (Years 16-21)

Figure 4: Housing Trajectory summary (shown in Publication draft Local Plan) 2018

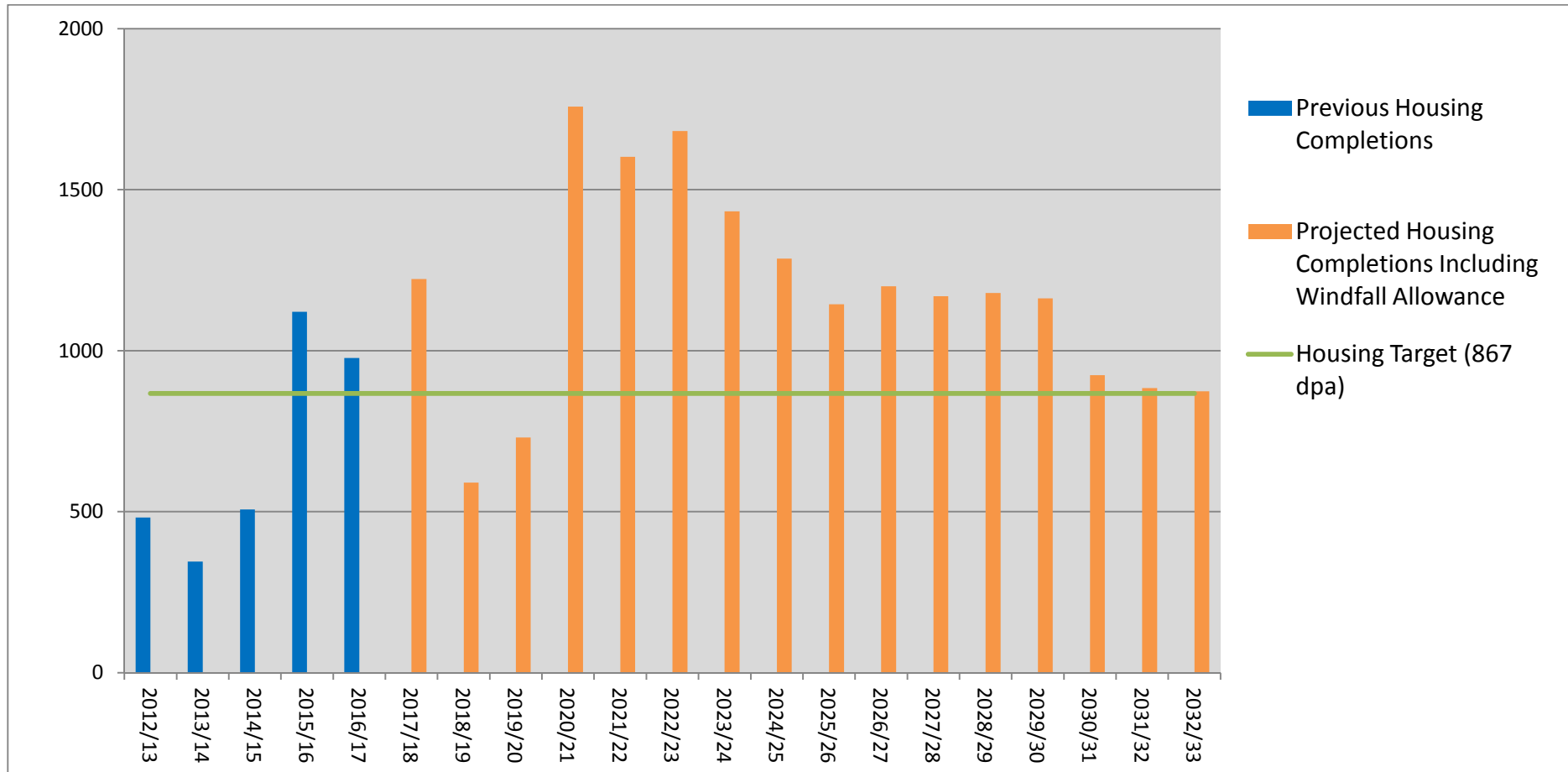


Figure 5: Housing Trajectory Supply (Start date 1st April 2017, end date 31st March 2033) (shown in the Publication draft Local Plan (2018))

	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Year	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33
Projected Housing Completions Including Windfall Allowance (From 2020/21)	1222	590	730	1758	1602	1682	1433	1286	1144	1200	1169	1179	1162	924	884	874
Annual Housing Target	867	867	867	867	867	867	867	867	867	867	867	867	867	867	867	867
Inherited Shortfall (2012 - 2017) Annualised over Plan Period	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56
Annual Target (Inclusive of shortfall)	923	923	923	923	923	923	923	923	923	923	923	923	923	923	923	923
Over/Under Supply of Housing against cumulative annual target	299	-34	-227	608	1287	2046	2556	2919	3140	3417	3663	3919	4158	4159	4120	4071

4.4 Detailed Housing Trajectory Assumptions

4.4.1 The detailed housing trajectory incorporates the following assumptions to ensure that the housing supply projection is as accurate as possible whilst there is an element of flexibility built in as set out in the NPPF.

Non-Implementation rate

4.4.2 Although there are a number of extant planning applications, it is reasonable to assume that a proportion of them will not go on to be developed. It is apparent that when considering the application of a non-implementation rate, a balance is required to ensure the most appropriate figure is applied, where demonstrated necessary.

4.4.3 The local evidence base collated (see Annex 5) demonstrates that it seems reasonable to apply a non-implementation rate in York. Whilst analysis of the planning consents identified a lapse rate of 7%, it is reasonable to allow some flexibility for the larger sites wherein there is limited evidence of delivery. Furthermore, responses received through the housing implementation survey generally suggest that it seems reasonable to apply a rate of 10%. A figure of 10% also aligns with similar rates used in inspectors decisions used nationally and examples from other Local Authorities.

4.4.4 For this reason, York considers it justified to **apply a 10% non-implementation rate** to extant planning permissions and site allocations identified for housing development.

Inherited Shortfall at 1st April 2017

4.4.5 Consideration is required to address historic housing shortfall. The Liverpool and Sedgefield approaches have both been highlighted as acceptable methods for calculating historic under supply in their (now abolished) regional spatial strategies.

4.4.6 There are two different approaches to how the 'backlog' of housing delivery has been approached in setting the future housing requirement; as follows:

- The 'Sedgefield approach' seeks to meet the backlog by loading the 'unmet provision from proceeding years' within the first five years of the plan;
- The 'Liverpool approach' or 'residual approach' seeks to meet the backlog over the whole plan period.

4.4.7 The NPPG (Reference ID: 3-035-20140306) provides advice on past under supply. This advice recognises that local circumstances will vary, that it is a matter of judgement and that there can be no universally applicable test. The NPPG also advises that Local Authorities should aim to deal with any past under supply in the first five years of a Plan.

- 4.4.8 It is the Council's view that it is not realistic, given the local circumstances, to deal with past under supply in the first five years of the Plan. Setting out in the Plan to deal with the past under supply in the first five years would not meet the NPPF test of an aspirational but also realistic Plan (NPPF para 154).
- 4.4.9 To make this shortfall up in the first five years of the Plan would mean such a significant step change in delivery rates that such rates would not be realistically deliverable. The average delivery rate over the past five years is 686 dwellings.
- 4.4.10 City of York Council therefore uses the Liverpool method in dealing with inherited shortfall to enable a stepped increase in supply that the market can accommodate and allows time for the large allocations that the Local Plan will rely upon in generating sufficient homes over the plan period. It is considered that this will allow the appropriate lead in times and delivery rates to generate the necessary housing supply to meet the required targets.
- 4.4.11 A target of 867 dwellings per annum results in a requirement to deliver 4,335 dwellings between 2012/13 – 2016/16. During the 5 years prior to 1st April 2017 (from 1st April 2012 to 31st March 2017) City of York experienced a total of 3,432 net housing completions (see Table 5 below).

Table 5: Historic Housing Completions (2012/13 to 2016/17)

Year	Completions	New Build	Net Conversions	Net Change of Use	Demolitions	Net Dwelling Gain
2012-2013	540	441	9	61	29	482
2013-2014	374	302	3	54	14	345
2014-2015	523	378	7	132	10	507
2015-2016	1171	908	1	218	6	1121
2016-2017	996	420	21	543	7	977
2012-2017	3604	2449	41	1008	66	3432

- 4.4.12 City of York is required to consider delivery of additional 903 homes across the plan period. Spreading the shortfall over the remaining Plan period (16 years) results in the need for an **additional 56 homes per annum** (i.e. $903 \div 16 = 56$ (rounded)).

Flexibility Buffer

- 4.4.13 As part of the detailed five year housing supply, paragraph 49 of the NPPF requires that a 5% buffer be added to ensure choice and competition in the market for land with the objective of bringing sites forward from later in the plan period. Where there has been a persistent record of under delivery of housing this buffer should increase to 20% to help boost the chances of achieving the necessary housing requirement.
- 4.4.14 Determining 'persistent under delivery' is not an exact science. Neither the NPPF nor the NPPG define the time period over which one must assess 'persistent

under-delivery'. The Council believes that calculations of persistent under delivery should be based on an analysis of completions against previous Plan requirements using data representative of the whole housing market cycle, which here in York is a ten year period.

- 4.4.15 As a result of analysing past delivery rates over a full cycle of the housing market in York, it is considered that 'persistent under delivery' applies to York. As a consequence, the Local Plan housing trajectory includes a **20% buffer** bought forward from the total requirement in the first five years (i.e. 6 years' worth of supply rather than 5 years) i.e. an extra 923 dwellings.

4.5 Detailed Housing Trajectory

- 4.5.1 Figure 6 sets out the detailed housing trajectory. The trajectory sets out the projected housing delivery including:

- Housing target (867 dwellings);
- Shortfall (56 dwellings pa between 2017/18-2032/33)
- Delivery of anticipated strategic and general housing site allocations incorporating the assumptions (including 10% non implementation rate);
- The anticipated delivery of extant planning permissions (including a 10% non-implementation rate);
- Windfall assumptions from year 4 of the plan period;
- 20% buffer applied for flexibility.

- 4.5.2 See Appendix 7 for a detailed breakdown of planning permissions included within the trajectory.

Figure 6: Detailed Housing Trajectory

	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38
1. Housing Allocations Below 5 ha (H Sites)																					
H1a	Former Gas Works, 24 Heworth Green (National Grid Properties)			35	35	70	70	61													
H1b	Former Gas Works, 24 Heworth Green (Northern Gas Networks)						35	30													
H3	Burnholme School			35	37																
H5	Lowfield School		35	35	35	35	22														
H6	Land R/O The Square																				
H7	Bootham Crescent				35	35	16														
H8	Askham Bar Park & Ride			35	25																
H10	The Barbican					70	70	47													
H20	Former Oakhaven EPH		35	21																	
H22	Former Heworth Lighthouse, Sixth Avenue (extension to Glen Lodge)	15																			
H23	Former Grove House EPH			5	6																
H29	Land at Moor Lane Copmanthorpe			35	35	18															
H31	Eastfield Lane Dunnington			35	35	6															
H38	Land RO Rufforth Primary School Rufforth			18	15																
H39	North of Church Lane Elvington			17	15																
H46	Land to North of Willow Bank and East of Haxby Road, New Earswick		35	35	34																
H52	Willow House EPH, 34 Long Close Lane				15																
H53	Land at Knapton Village		4																		
H55	Land at Layerthorpe				20																
H56	Land at Hull Road		30	40																	
H58	Clifton Without Primary school		15	10																	
H59	Queen Elizabeth Barracks - Howard Road Strensall					15	15	15													
2. Housing Allocations Above 5 ha (ST Sites)																					
ST1a	British Sugar/Manor School				35	140	140	140	140	140	140	140	85								
ST1b	Manor School				35	65															
ST2	Former Civil Service Sports Ground Millfield Lane		35	35	35	35	35	35	35	21											
ST4	Land Adj. Hull Road and Grimston Bar		35	35	35	35	35	36													
ST5	York Central - Uplift to 1700 with Improved Delivery Rate			100	100	100	100	100	100	100	100	100	150	150	150	150	200				
ST7	Land East of Metcalfe Lane			35	35	70	70	70	70	70	70	70	70	70	70	70	5				
ST8	Land North of Monks Cross - Improved Delivery Rate		35	70	70	70	105	105	105	105	105	105	93								
ST9	Land North of Haxby			35	35	35	70	70	70	70	70	70	70	70	70						
ST14	Land to West of Wigginton Road			35	70	105	105	105	105	105	105	105	105	105	105	105	88				
ST15	Land to West of Elvington Lane - Uplift to 3339			35	70	105	105	105	140	210	210	280	280	280	280	280	280	280	280	280	119
ST16	Terrys Extension Site - Terrys Clock Tower (Phase 1)	22																			
ST16	Terrys Extension Site - Terrys Car park (Phase 2)			17	16																
ST16	Terrys Extension Site - Land to rear of Terrys Factory (Phase 3)			18	17	21															
ST17	Nestle South (Phase 1)		50	70	70	73															
ST17	Nestle South (Phase 2)						70	70	70	70	70	70	70	70	40						
ST31	Land to the South of Tadcaster Road, Copmanthorpe			35	35	35	35	18													
ST32	Hungate (Phases 5+) (Block D / H)			186		142															
ST33	Station Yard Wheldarke			35	35	35	35	7													
ST35	Queen Elizabeth Barracks, Strensall					35	35	70	70	70	70	70	70	10							
ST36	Imphal Barracks, Fulford Road															100	100	100	100	100	100
3. Projected Completions from all Unimplemented Consents																					
Total	1207	568	386	492	363	163	105	94	70	70	60	0	0	0	0	0	0	0	0	0	0
Supply Trajectory																					
Projected Completions (all sites)	1222	590	730	1589	1433	1513	1264	1117	975	1031	1000	1010	993	755	715	705	673	380	380	219	100
windfall	0	0	0	169	169	169	169	169	169	169	169	169	169	169	169	169	169	169	169	169	169
Projected Housing Completions Including Windfall Allowance	1222	590	730	1758	1602	1682	1433	1286	1144	1200	1169	1179	1162	924	884	874	842	549	549	388	269
Cumulative Completions (Including Windfalls)	1222	1812	2542	4300	5902	7584	9017	10303	11447	12647	13816	14995	16157	17081	17965	18839	19681	20230	20779	21167	21436
Target (867pa plus 56pa undersupply) 923pa	923	923	923	923	923	923	923	923	923	923	923	923	923	923	923	923	867	867	867	867	867
Cumulative Target	923	1846	2769	3692	4615	5538	6461	7384	8307	9230	10153	11076	11999	12922	13845	14768	15635	16502	17369	18236	19103
Over/Under Supply	299	-34	-227	608	1287	2046	2556	2919	3140	3417	3663	3919	4158	4159	4120	4071	4046	3728	3410	2931	2333
Detailed Trajectory (including 10% Non-Implementation Rate)																					
Projected Completions (all sites)	1222	590	730	1589	1433	1513	1264	1117	975	1031	1000	1010	993	755	715	705	673	380	380	219	100
Projected Completions (all sites) - 10% Non-implementation Rate Applied	1100	531	657	1430	1290	1362	1138	1005	878	928	900	909	894	680	644	635	606	342	342	197	90
Windfall Allowance				169	169	169	169	169	169	169	169	169	169	169	169	169	169	169	169	169	169
Total Projected Completions (with 10% Non implementation rate applied and	1100	531	657	1599	1459	1531	1307	1174	1047	1097	1069	1078	1063	849	813	804	775	511	511	366	259
Cumulative Completions (with 10% non implementation rate applied and	1100	1631	2288	3887	5346	6877	8183	9357	10404	11501	12570	13648	14711	15559	16372	17175	17950	18461	18972	19338	19597
Annual Housing Target	867	867	867	867	867	867	867	867	867	867	867	867	867	867	867	867	867	867	867	867	867
Inherited Shortfall (2012 - 2017) Annualised over Plan Period	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56					
Annual Target (Inclusive of Shortfall)	923	923	923	923	923	923	923	923	923	923	923	923	923	923	923	923	867	867	867	867	867
Cumulative Annual Target (Inclusive of Shortfall)	923	1846	2769	3692	4615	5538	6461	7384	8307	9230	10153	11076	11999	12922	13845	14768	15635	16502	17369	18236	19103
Over/Under Supply of Housing (calc = Cumulative completions - cumulative annua	177	-215	-481	195	731	1339	1722	1973	2097	2271	2417	2572	2712	2637	2527	2407	2315	1959	1603	1102	494

4.6 Five Year Housing Supply

- 4.6.1 Table 6 below provides details of the elements of supply that have been considered when assessing our five year housing land supply. This uses the same information set out in section 4.5 and Figure 6 but truncated to the first 6 years of the plan.
- 4.6.2 Table 6 sets out City of York Council's assessment of the housing land supply position at 1st April 2017 and has projected forward a five year housing supply for the years 2018/19 to 2022/23. This period reflects the supply position as consulted on within the Local Plan Publication Draft (February 2018).

Table 6: Five Year Housing Land Supply

Five Year Housing Land Supply Calculations		Dwelling Number
A	Annual housing target across the Plan period	867
B	Cumulative Housing target (2017/18 -2022/23) (Calculation = Row A x 6)	5202
C	Inherited shortfall (2017/18 to 2022/23) (Calculation = 56 x 6)	336
D	Cumulative Housing Target plus Shortfall (Calculation = Row B + Row C)	5538
E	Total dwellings estimated to be complete within 5 years (2017/18- 2022/23) (Calculation = all site allocations and unimplemented consents with 10% non implementation rate applied+ windfalls)	6877
F	Under/over supply of housing (Calculation = Row E - D)	1339
G	20% Buffer required for flexibility (1 year supply)	923
H	Remaining oversupply (Calculation = Row F-G)	414
CYC Housing Land Supply for period 2017/18- 2022/23		6.38 years

- 4.6.3 Table 6 and Figure 7 shows that City of York Council can demonstrate 6.38 years of housing supply over the years 2017/18-2022/23. It demonstrates that a 20% buffer for flexibility can be achieved plus an additional over supply of 414 net new homes (Row H) presenting an additional 0.38 years.
- 4.6.4 The housing supply has also incorporated a non-implementation rate of 10% that reduces down the potential projected delivery on all assessed deliverable sites and extant planning permissions. Together with a 20% buffer added to the five year requirements, we believe the projected over supply provides the necessary flexibility within our calculations to be confident of achieving the overall five year housing requirements.

FIGURE 7

Detailed Five Year Supply

		0	1	2	3	4	5
		2017/18	2018/19	2019/20	2020/21	2021/22	2022/23
1. Draft Housing Allocations Below 5 ha (H Sites)							
H1a	Former Gas Works, 24 Heworth Green (National Grid Properties)			35	35	70	70
H1b	Former Gas Works, 24 Heworth Green (Northern Gas Networks)						
H3	Burnholme School				35	37	
H5	Lowfield School			35	35	35	35
H6	Land R/O The Square						
H7	Bootham Crescent					35	35
H8	Askham Bar Park & Ride				35	25	
H10	The Barbican						70
H20	Former Oakhaven EPH			35	21		
H22	Former Heworth Lighthouse, Sixth Avenue (extension to Glen Lodge)	15					
H23	Former Grove House EPH				5	6	
H29	Land at Moor Lane Copmanthorpe				35	35	18
H31	Eastfield Lane Dunnington				35	35	6
H38	Land RO Rufforth Primary School Rufforth				18	15	
H39	North of Church Lane Elvington				17	15	
H46	Land to North of Willow Bank and East of Haxby Road, New Earswick			35	35	34	
H52	Willow House EPH, 34 Long Close Lane					15	
H53	Land at Knapton Village			4			
H55	Land at Layerthorpe					20	
H56	Land at Hull Road			30	40		
H58	Clifton Without Primary school			15	10		
H59	Queen Elizabeth Barracks - Howard Road Strensall						15
	Total	15	0	189	356	377	249
2. Draft Housing Allocations Above 3 ha (ST Sites)							
ST1a	British Sugar/Manor School					35	140
ST1b	Manor School					35	65
ST2	Former Civil Service Sports Ground Millfield Lane			35	35	35	35
ST4	Land Adj. Hull Road and Grimston Bar			35	35	35	35
ST5	York Central - Uplift to 1700 with Improved Delivery Rate				100	100	100
ST7	Land East of Metcalfe Lane				35	35	70
ST8	Land North of Monks Cross - Improved Delivery Rate			35	70	70	70
ST9	Land North of Haxby				35	35	35
ST14	Land to West of Wigginton Road				35	70	105
ST15	Land to West of Elvington Lane - Uplift to 3339				35	70	105
ST16	Terrys Extension Site - Terrys Clock Tower (Phase 1)		22				
ST16	Terrys Extension Site - Terrys Car park (Phase 2)				17	16	
ST16	Terrys Extension Site - Land to rear of Terrys Factory (Phase 3)				18	17	21
ST17	Nestle South (Phase 1)			50	70	70	73
ST17	Nestle South (Phase 2)						
ST31	Land to the South of Tadcaster Road, Copmanthorpe				35	35	35
ST32	Hungate (Phases 5+) (Block D / H)				186		142
ST33	Station Yard Wheldarke				35	35	35
ST35	Queen Elizabeth Barracks, Strensall						35
ST36	Imphal Barracks, Fulford Road						
	Total	0	22	155	741	693	1101
3. Projected Completions from all Unimplemented Consents							
	Total	1207	568	386	492	363	163
Row in Table 6	Projected Completions (all site allocations + unimplemented consents)	1222	590	730	1589	1433	1513
	Projected Completions (all site allocations + unimplemented consents) - 10% Non-implementation Rate Applied	1100	531	657	1430	1290	1362
	Windfall Allowance				169	169	169
	Total Projected Completions (all site allocations with 10% Non implementation rate applied + windfalls)	1100	531	657	1599	1459	1531
ROW E	Cumulative Completions (with 10% non implementation rate applied and	1100	1631	2288	3887	5346	6877
ROW A & B	Annual Housing Target	867	867	867	867	867	867
ROW C	Inherited Shortfall (2012 - 2017) (Annualised over Plan Period)	56	56	56	56	56	56
	Annual Target (Inclusive of Shortfall)	923	923	923	923	923	923
ROW D	Cumulative Annual Target (Inclusive of Shortfall)	923	1846	2769	3692	4615	5538
ROW F	Over/Under Supply of Housing	177	-215	-481	195	731	1339
ROW G	20% Buffer (923 dwellings split across 5 years)		185	185	185	185	185
ROW H	Over/Under Supply of Housing (with non-inp rate applied) Compared to cur	177	-400	-851	-360	-9	414