

Matter 5 – Housing Land Supply

The housing land supply overall

5.1 Does Policy SS1, and the Plan as a whole, provide an appropriate policy framework for the delivery of housing over the Plan period? If not, how is this to be addressed?

1. Policy SS1 looks for the plan to deliver the housing requirement of 967 dwellings per annum (dpa). It also provides five spatial principles to guide the location of development. The HBF is keen that the Council produces a plan which can deliver against its housing requirement and as part of that provides a sufficient supply of land.
2. Policy SS1 states that where viable and deliverable, the re-use of previously developed land will be phased first. It is not clear how this will work in practice. The NPPF¹ refers to encouraging rather than prioritising the effective use of previously developed land. This encouragement could be through incentives such as lower planning obligations or different funding mechanisms or the use of brownfield registers. It is therefore recommended that the policy text be amended to refer to sustainable sites, or if reference to previously developed land is to be retained that 'will be phased first' is replaced with 'be encouraged'.

5.2 We understand through the latest housing trajectory update [EX/CYC/69] that the sources of housing land supply underpinning the Plan are as follows:

- **8,642 dwellings on allocated new strategic housing sites (ST)**
- **1,703 dwellings on allocated housing sites (H)**
- **1,853 dwellings (commitments – unimplemented permissions as at 1 April 2021)**
- **3,113 dwellings (cumulative completions between 2017-2021)**
- **planning permission or resolution to grant planning permission as at 1 April 2021)**
- **720 dwellings in communal establishments /student accommodation**
- **1,764 dwellings on windfall sites (from 2024/25 – 2032/33 @196 per annum)**

This provides a total housing supply of a minimum of 17,795 dwellings during the Plan period. Is this correct?

3. The HBF is keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period.
4. The HBF supports the Council in ensuring there is a supply of housing land over the housing requirement to provide a buffer. This buffer should be sufficient to deal with

¹ NPPF 2012 paragraph 111

Home Builders Federation (HBF) response to the
Examination of the City of York Local Plan 2017 – 2033
Matters, Issues and Questions for the Examination

any under-delivery which is likely to occur from some sites and to deal flexibly with any unforeseen circumstances. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible.

5. The HBF does not comment on the merits or otherwise of individual sites therefore our representations are submitted without prejudice to any comments made by other parties on the deliverability of specific sites included in the overall HLS, 5 YHLS and housing trajectories.
 6. The housing supply makes an allowance for windfall sites of 196 dwellings per annum from 2024/25. It is not clear what the evidence is to support this figure. The HBF considers that the use of historic windfall in an area where there has been no adopted Plan may not provide the most appropriate basis for windfall development going forward, and recommends that this should be removed from the supply and instead used to provide flexibility.
- 5.3 We note that the windfall allowance per annum has been increased from 169 dwellings per annum in previous housing trajectories (e.g. [EX/CYC/17]) to 196 dwellings per annum in the 2021 Housing Trajectory [CYC/EX/69]. Is this correct? If so, what is the basis and justification for this change in the windfall allowance?**
7. The HBF is not aware of any robust evidence that support this increase in windfall allowance. The HBF does not consider that the use of historic windfall as a form of evidence is appropriate in York where there has not been adopted Plan. The HBF consider that any windfall should be used to create flexibility in addition to the identified supply, rather than contributing to the supply.
- 5.4 Is the estimate of windfall numbers identified by the Plan appropriate and realistic? Is the approach consistent with the Framework? Given the time that has passed since the Plan was submitted, is the identified windfall allowance in the Plan (169 dwellings per annum) still appropriate, realistic and justified?**
8. The NPPF 2012 makes reference to the use of a windfall allowance in relation to the five-year supply and requires the Council to have compelling evidence that such sites have consistently become available in the local areas and will continue to provide a reliable source of supply. The HBF does not consider that the Council have compelling evidence to support this windfall allowance and to show that these sites will continue to provide a reliable source of supply.
- 5.5 Are the suggested rates of planned housing development realistic and achievable when considered in the context of the past completion rates? What actions are being taken to accelerate housing delivery? Where is the evidence to support the approach adopted?**
9. Table 1 below shows the net additional dwellings provided in York for the last five years, this shows that an average of 661 dwellings have been provided each year, with a peak of 1,296 in 2017/18.

Home Builders Federation (HBF) response to the
Examination of the City of York Local Plan 2017 – 2033
Matters, Issues and Questions for the Examination

Table1: DLUHC Net additional dwellings for York					
2016-17	2017-18	2018-19	2019-20R	2020-21	Average
378	1,296	449	560	622	661

10. The Update Housing Trajectory (EXCYC69) shows projected completions ranging from 645 in 2021/22 to 1,809 in 2023/24. The HBF considers that it will be particularly important that the Council is working closely with the housebuilding industry to ensure that the delivery of the trajectory is possible. It will also be important for the Council to take action quickly if it becomes evident that there are sites that are not coming forward as expected.
11. The Council would expect the Council to have evidence of any engagement it has had with the homebuilding industry to support the delivery of each of the sites in line with the trajectory provided.

5.6 Is the housing trajectory update [EX/CYC/69] realistic? In the context of footnote 11 of the NPPF, does it form an appropriate basis for assessing whether sites are deliverable?

12. The HBF does not wish to comment on the deliverability of individual sites. However, the HBF recommends that the Council's assumptions on sites in relation to delivery, potential capacity, lead in times and build out rates should be realistic and based on evidence supported by the parties responsible for housing delivery; engagement with the relevant landowner, promoter or developer; other stakeholders involved, and sense checked by the Council based on local knowledge and historical empirical data. The HBF considers that this close working with the home building industry and those involved in the delivery of the site should ensure an appropriate basis for assessing whether sites are deliverable in line with footnote 11 of the NPPF 2012. It would be beneficial if further information from in relation to the assumptions and this engagement had been included within the supporting information for the trajectory to assist others in considering the deliverability of the sites.

Five-year housing land supply

5.7 What is the five-year housing supply requirement upon adoption of the Plan?

13. Based on the Council's proposed housing requirement of 822dpa, the persistent under-delivery of housing (supported by the housing delivery test (HDT) score of 65% for 2021) which means that the Council has to apply the 20% buffer, and the shortfall in housing delivery. The HBF considers the five-year housing supply requirement can be calculated as follows:

Table 2: Five Year Housing Supply Requirement Calculation		
A	Housing Requirement (2017 to 2032/33, 16 yrs)	13,152
B	Annual Housing Requirement (A / Plan Period)	822 (13,152 / 16)
C	Five Year Housing Requirement	4,110

Home Builders Federation (HBF) response to the
Examination of the City of York Local Plan 2017 – 2033
Matters, Issues and Questions for the Examination

	(B X 5)	(822 x 5)
D	Completions (Taken from Housing Trajectory EXCYC69) (2017/18, 2018/19, 2019/20, 2020/21 4 yrs)	3,113 (1,351+451+627+704)
E	Expected Completions based on Housing Requirement (B X 4)	3,288 (822 x 4)
F	Surplus / Shortfall in housing delivery (D – E)	-175
G	Five Year Requirement (incorporating any shortfall i.e., F is negative) (C – F)	4,285 (4,110-(-175))
H	Buffer (20%) (G X 20%)	857 (4,285 x 20%)
I	Five Year Requirement (Incorporating any shortfall and the buffer) (G+H)	5,142 (4,285+857)
J	Annualised Five Year Requirement (I / 5)	1,028.4 (5,142 / 5)

The Council is asked to clearly set out the calculation for the five-year housing supply requirement.

5.8 Will the Council be able to demonstrate a five-year housing land supply upon adoption of the Plan?

14. The Council's Housing Trajectory (EXCYC69) suggests that the Council will be able to demonstrate a five-year housing land supply upon adoption of the Plan. However, as mentioned previously, the housing trajectory provides limited information as to the deliverability of these sites. Without further information, it is not possible for the HBF to comment on whether the Council is able to demonstrate a five-year housing land supply.

5.9 The five-year housing supply, as set out in the latest housing trajectory update [EX/CYC/69], includes an allowance for windfall sites – the aforementioned 196 per annum:

a) What is the compelling evidence that such sites have consistently become available in the local area and that they will continue to provide a reliable source of supply?

15. As set out previously the HBF does not consider that the Council has provided compelling evidence to support the inclusion of windfall development within the five-year supply.

b) Is the allowance made realistic, having regard to paragraph 48 of the Framework?

16. Without appropriate evidence to support the windfall provision the HBF is not able to comment as to whether this allowance is realistic.

5.10 Does the five-year housing land supply position, as set out in the updated Housing Trajectory 2021 [EX/CYC/69], present the most up-to-date position? Is it consistent with all other remaining up-to-date housing evidence? If not, how is this to be addressed?

17. The HBF considers that this is a question for the Council.

5.11 Paragraph 5.9 of the submitted Plan identifies that the Council accepts that there has been a persistent under delivery of housing as defined by the NPPF. As such, does the submitted Plan, and any subsequent submitted evidence on meeting housing need and supply, take into account the requirement for a 20% buffer to be applied to the housing supply? Has this buffer been applied to any subsequent update of evidence or proposed modification to the Plan identified?

18. The HBF considers that the 20% buffer should be taken into account, as the Council still has continued to persistently under deliver homes.

5.12 Overall, is there a supply of specific deliverable sites sufficient to provide five years' worth of housing, with an appropriate buffer (moved forward from later in the Plan) to ensure choice and competition in the market for land?

19. The Council's Housing Trajectory (EXCYC69) suggests that the Council will be able to demonstrate a five-year housing land supply upon adoption of the Plan. However, as mentioned previously, the housing trajectory provides limited information as to the deliverability of these sites. Without further information, it is not possible for the HBF to comment on whether the Council is able to demonstrate a five-year housing land supply.

We ask the Council to clearly set out how the five-year supply requirement has been calculated and, as part of this, to identify the specific deliverable sites against which that five-year requirement will be met. Please ensure that this tallies with the delivery of housing shown in the Infrastructure Requirements Gantt Chart (January 2022) [EX/CYC/70].