



City of York Council
Local Plan Examination

Matter 5 Housing Land Supply

March 2022



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MATTER 5: HOUSING LAND SUPPLY

The housing land supply overall

Q5.1 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?

Q5.2 We understand through the latest housing trajectory update [EX/CYC/69] that the sources of housing land supply underpinning the Plan are as follows: ... This provides a total housing supply of a minimum of 17,795 dwellings during the Plan period. Is this correct?

1.1.1 Gladman consider that Policy SS1 provides an appropriate framework for the delivery of housing over the plan period with a significant supply buffer above the proposed housing requirement of 822 dpa.

1.1.2 It is considered that the contributions to housing land supply set out in Question 5.2 are correct and provide a minimum housing land supply of 17,795 over the plan period (prior to the 10% non-implementation discount being applied).

Q5.3 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?

Q5.4 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?

1.1.3 As highlighted, the updated Housing Trajectory (EX/CYC/69) states that from the monitoring year 2024/25 an annual windfall allowance of 196 dwellings has been included.

1.1.4 The 2021 SHLAA update (EX/CYC/56) sets out a robust and justified approach to establishing a windfall allowance figure (Annex 4) which considers historic delivery trends,

types of windfall sites and developments alongside accounting for potential double counting. Notwithstanding this, the report concluded that 182 dwellings per annum reflected an appropriate level for windfall allowance. Indeed, this figure was then acknowledged in the January 2021 Annex 7 – Housing Supply Update (EX/CYC/59i) and trajectories included in the 2021 SHLAA update.

1.1.5 It may be that the confirmed housing completion data from the 2020/21 monitoring year has adjusted the average windfall delivery rates and the uplift to the annual windfall allowance now included in the trajectory is justified. Gladman propose that the Council provide clarity as to the updated windfall allowance figure.

1.1.6 Notwithstanding this, the Council can demonstrate a healthy supply buffer against the housing requirement (822 dpa) over the plan period when including either the 196 dpa (29% buffer) or 182 dpa (26% buffer) windfall allowance figure (These supply buffers include a 10% non-implementation discount).

	Windfall allowance 1,638 (182 x 9 years)	Windfall allowance 1,764 (196 x 9 years)
Projected Completions (excl windfall)	17,669	17795
10% Non-Implementation Discount Applied	16,066	16,503
Housing requirement (822 x 15)	12,330	12,330
Supply Buffer	26%	29%

Q5.5 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?

Q5.6 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?

1.1.7 It is considered that the housing trajectory update (EX/CYC/69) provides realistic and achievable delivery rates which corresponds to guidance within Paragraph 48 of the Framework and to information set out in the Housing Implementation Study within the 2018 SHLAA (SD049b Annex 5). This study considers local delivery evidence, stakeholder engagement and independent commentary on housing delivery rates.

1.1.8 Nonetheless, the study is based on a survey conducted in 2015, a report published in 2017 and delivery data up to 2016/17. Therefore, it might be prudent to update the information to account for significant housing delivery completions which have taken place since and may indicate a changing situation. Indeed, between 2016/17 4,090 dwellings have been completed equating to an annual average delivery rate of 818 dwellings.

1.1.9 Gladman consider that the trajectory forms an appropriate basis for assessing whether sites are deliverable in the context of footnote 11. The sites have been considered to be located in a suitable location for development during the local plan process, while the updated 2021 SHLAA provides additional site-specific information justifying the delivery timescales, rates and availability of sites to be developed.

The housing land supply overall

Q5.7 What is the five-year housing supply requirement upon adoption of the Plan?

1.1.10 Gladman consider that the five-year housing land supply requirement upon adoption (assuming that the plan is adopted during the 2022/23 monitoring year) will be 5,160 dwellings.

1.1.11 The following table sets out Gladman's considerations:

a)	Annual housing requirement	822
b)	Base Five year requirement (= a x 5)	4,110
c)	Delivery shortfall (-417)	-417
d)	Liverpool Method to address shortfall ($417 / 11$ (remaining plan period years) x 5) (= c / 11) X 5	190
e)	Base Five year requirement + shortfall (= b + d)	4,300
f)	20% Buffer (= 20% of e)	860
g)	Five-year housing land supply requirement at 01 April 2022 (= e+f)	5,160

Q5.8 Will the Council be able to demonstrate a rolling five-year housing land supply upon adoption of the Plan?

1.1.12 It is considered that on adoption of the Local Plan (assuming adoption within the 2022/23 monitoring year) the Council will be able to demonstrate a housing land supply of 6.5 years. This addresses the accumulated delivery shortfall (-417) over the remaining plan period (11 years) while applying a 20% buffer to the housing requirement.

1.1.13 When employing a 20% buffer to the housing requirement it is considered that the Council will be able to maintain a rolling five-year housing land supply until the 2031/32 monitoring

year. However, the Council's projected delivery rates within the latest trajectory are significantly above the annual housing requirement and therefore they would not be subject to a 20% buffer as calculated through the Housing Delivery Test.

- 1.1.14 Applying a 5% buffer to the housing requirement would enable the Council to demonstrate a rolling five year housing land supply across the whole plan period.

Q5.9 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?
- b) Is the allowance made realistic, having regard to paragraph 48 of the Framework?

- 1.1.15 Gladman refer to the answers set out in response to Questions 5.5 and 5.6 above.

Q5.10 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?

- 1.1.16 This is for the Council to answer, Gladman reserve the right to comment following any additional information provided by the Council.

Q5.11 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?

- 1.1.17 As highlighted through the updated detailed trajectory (EX/CYC/69) the Council have applied a 20% buffer to the annual housing requirement of 822 dpa to address persistent under delivery in housing.

Q5.12 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?

1.1.18 Gladman consider that there is a sufficient deliverable supply included in the Plan trajectory to provide for a five year supply of housing. The housing land supply position for the current monitoring years provides a significant buffer above 5 years to ensure choice and competition alongside address the historic under delivery of housing.

1.1.19 It is important to recognise that a number of the allocated sites have already received planning permission, are being taken to planning committee or are subject to planning applications.

