

Matter 5 - Housing Land Supply

Made on behalf of York Housing Association, Karbon Homes Ltd, & Karbon Developments

The Housing Land Supply Overall

Question 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?

- 1.1 We have concerns that Policy SS1 does not provide a robust framework for the delivery of housing because the Councils' ambitions for jobs growth is not reflected in the housing requirement and that the housing requirement does not take into account market signals and the affordable housing shortage in York.
- 1.2 Our concerns can largely be addressed by increasing the housing requirement and by identifying a range and choice of housing sites, in particular the allocation of a plentiful supply of small-to-medium-sized sites.
- 1.3 This would help ease the reliance on the 'Garden Village' sites which, are more complex to deliver in a timely fashion.

Question 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?

- 1.4 The Windfall Allowance Technical Paper produced in 2016 sets out that a figure of 152 dwellings per annum provides an appropriate level reflecting the past development trends. However, the Council later confirm in the TP1 Addendum 2021 that a windfall allowance of 169 dwellings per annum should be applied, based on the past ten-year trend for delivery of windfall sites.
- 1.5 It is our view that the Council have overestimated the likely number of windfall dwellings that will realistically be built out, if and when, the Plan is adopted. Given that no adopted local plan has been in place for such a long time, it follows that an artificially high number of windfall sites will have been delivered throughout this period. It is unlikely that such a rate can be sustained following adoption of the Plan. Upon adoption of the Plan, it is likely that developers will gravitate towards the allocated sites, where development is easier to achieve. In any event, it is not unreasonable to assume that majority of windfall opportunities in York have already been realised or are identified as part of the Plan process. Whilst we accept that windfall can be

included in the housing requirement, some local authorities see the base housing requirement as a minimum starting figure and regard windfall development as boosting housing delivery.

1.6 In paragraph 7.13 of the TP1 Addendum 2021, it is stated that:

‘The inclusion of a qualified allowance for windfalls within the Local Plan’s housing supply trajectory serves to minimise the need for new Local Plan allocations within the general extent of York’s green belt’

1.7 We understand that the Council are seeking to minimise the need for new allocations in the Green Belt through including a windfall allowance in the Plan’s housing supply as they explicitly state within the TP1 Addendum. However, this approach runs the risk that the Council will struggle to meet the housing requirement should the projected windfall allowance fail to materialise as we suggest it will. We are of the view that the windfall allowance, if realised, should be treated as boosting the housing requirement.

Question 5.5

Are the suggested rates of planned housing development realistic and achievable when considered in the context of the past completion rates? Where is the evidence to support the approach adopted?

1.8 The Council are seeking to delivery 822 dwellings per annum at a minimum.

1.9 A review of the past delivery rates over the last 10 years has identified a large fluctuation in the number of dwellings completed. The table below shows the completion rate over for City of York Council for the past 10 years.

Year	Total Completions	Net Dwelling Gain
2011-2012	354	321
2012-2013	540	482
2013-2014	374	345
2014-2015	523	507
2015-2016	1,171	1,121
2016-2017	996	977
2017-2018	1,336	1,296
2018-2019	481	449
2019-2020	596	560
2020/2021	643	622
Average	702 (rounded up)	668

Table 1 – Past Housing Completions 2011-2021

- 1.10 As evidenced in **Table 1**, the lowest total completion figure was 354 which was in 2011/2012 whilst the largest number of annual completions equated to 1,336 in 2017/2018.
- 1.11 The overall 5-year average completions between 2016/2017 and 2020/2021 was 811.
- 1.12 Whilst historic delivery is, on average, lower than proposed by the Council we note that this is in the context of there being no local plan and therefore no allocations. We note that when land has been available high levels of completions have been achieved. This is a factor of the significant demand for additional housing in York.
- 1.13 It is quite clear that over 1,000 dwellings can be delivered in York if land is released for development and there is the right proportion of small and medium sized sites as well as larger sites which can continue developing throughout the plan period.

Question 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?

- 1.14 The Council have identified a number of large strategic sites (both greenfield and brownfield) within the latest iteration of the Plan and these will provide 80+% of the total housing requirement over the Plan period. Although it is acknowledged that there is a need to allocate the Garden Villages and the other large sites it is nevertheless clear that delivery from them needs to be realistic. We consider that the trajectory produced by York City Council is somewhat ambitious.
- 1.15 The housing delivery from strategic allocations ST4, ST5, ST8 and ST14 and ST15 is ambitious given their current planning status. The table below highlights the year these sites are expected to deliver the first dwellings according to the Housing Trajectory Update ([EX/CYC/69](#)), alongside the current planning status of these allocations.

Site	First Dwellings to be brought forward	Current Planning Status
ST4 – Land adjacent Hull Road and Grimston Bar	2023/2024	<p>There are two applications currently pending consideration on this site. The first is for full planning permission for the erection of 175 dwellings and associated works valid under 15/00166/FULM, and the second is for the erection of 52 dwellings and associated works on the adjacent parcel of land that form ST4 which is valid under 15/00167/FULM and is running in tandem to the other application.</p> <p>At the time of writing, there were a number of technical consultee comments that still needed to be addressed including Forward Planning and Drainage. The application is yet to be decided and therefore at the time of writing, this</p>

Site	First Dwellings to be brought forward	Current Planning Status
		site does not benefit from planning permission.
ST5 – York Central	2022/2023	<p>Outline permission for up to 2,500 homes was approved under 18/01884/OUTM on 24.12.2019. Reserved matters were submitted and approved in November 2020 (20/00710/REMM) for the layout, scale, appearance, landscaping and access of the primary vehicle route and associated roads, infrastructure, landscaping and alterations to the existing road network. Reserved Matters for the erection of a new events hall relating to the National Railway Museum was submitted in December 2021 and is pending consideration.</p> <p>A reserved matters application for the approval of the layout, scale, appearance, landscaping and access of the dwellings has not yet been submitted.</p>
ST8 – Land at Monks Cross	2022/2023	An outline application was submitted on this site in January 2018 under reference 18/00017/OUTM. The Council have failed to issue a decision in the required timeframe and therefore the Applicants lodged an Appeal against York City Council for the non-determination of the application which was heard at an Inquiry in January 2022. The application is yet to be decided and therefore at the time of writing, this site does not benefit from outline permission.
ST14 – Land West of Wigginton Road	2023/2024	No application has been submitted to date.
ST15 – Land West of Elvington Lane	2024/2025	No application has been submitted to date.
ST31 – Tadcaster Road, Copmanthorpe	2023/2024	Outline planning permission for 160 dwellings was submitted in March 2018 under reference 18/00680/OUTM and is currently pending consideration. Correspondence on the public access file suggests that the application is likely to be determined shortly, however at the time of writing, this site does not benefit from outline planning permission.

Table 2 - Planning Status of Sites ST4, ST5, ST8, ST14, ST15 and ST31.

- 1.16 The table above provides a snapshot of the Council's trajectory, the majority of the allocations do not have either outline or full planning permissions and therefore delivery is likely to take place several years from now.
- 1.17 It is well recognised that larger sites present more complex issues and generally take longer to bring forward than smaller sites. The planning applications generally take longer to determine. [Lichfield's research](#)¹ on the matter shows that the average timeframe from validation of the first completion for sites between 100-499 dwellings is a total of 4 years and increasing to an average of 5 years for sites between 500-999 dwellings. Schemes of 1,000-1,499 are on average 6.9 years from validation of the first application to completion of the first dwelling.
- 1.18 Further, even if there was a pending application concerning the site, the research by Lichfields also shows that the average lead-in time from the granting of planning permission to the completion of the first dwelling is 2.9 years for sites with over 2,000 dwellings. It is this period during which pre-commencement conditions have to be discharged, as well as other technical approvals and associated commercial agreements put in place which can bring further delays to the process.
- 1.19 In the context of the above we have the following comments on the projected delivery of the allocations. We have reserved our comments to simply the start date on site.

ST5

- 1.20 ST5 is a large brownfield site with a yield of 2,500, 1,807 of which are shown to be delivered in the plan period according to the latest Housing Trajectory Update.
- 1.21 We note that delivery from ST5 increased from 410 units in the Preferred Options Local Plan (2013), to 1,250 over the plan period in the Preferred Sites Consultation (2016). It is now expected to deliver 1,700 houses in the plan period as set out in the Publication Draft Local Plan (2018). We note that the Housing Trajectory Update for ST5 differs from the Plan. This is not explained.
- 1.22 The trajectory shows the first dwellings to be brought forward in 2023/2024. The site benefits from outline consent and a reserved matters submission has been made and approved for the remediation and infrastructure works. However, a reserved matters submission for the approval of the layout, scale, appearance, landscaping and access of the dwellings has not yet been submitted.
- 1.23 Extensive initial ground works and pre-commencement works are required to be undertake on this sensitive site. For the reasons presented above, it is our view that the first dwelling on ST5 will not come forward in 2023/2024. This is supported by evidence given by Chris Jones of Avison Young, who acting as Expert Witness on behalf of Homes England, Network Rail and the National Railway Museum, at the York Central Stopping Up Enquiry where he confirms that the

¹ Start to Finish: What factors affect the build-out rates of large-scale housing sites? - Lichfields, (2020)

construction of the development plots at York Central are expected to commence from 2024 with the first uses coming forward in 2025.

- 1.24 Further, the trajectory shows continuous delivery from ST5 throughout the plan period, even rising from 107 dwellings being delivered per annum between 2024/2025 to 2027/2028, to 143 dwellings being delivered per annum from 2032/2033 to the end of the plan period. However, the dwellings on ST5 will largely take the form of apartments. Apartments can only be considered to be delivered once the entire block is complete and would therefore impact on the delivery rate. This means that the delivery rate from this site may be higher in certain years and lower in others.
- 1.25 Based on this evidence, it is our view that the trajectory for ST5 is somewhat unrealistic and is unlikely to provide any residential completions until 2026/27 at the earliest.

ST8 – Land at Monks Cross

- 1.26 At the time of writing, the site does not have planning permission albeit it is noted that there is an appeal underway relating to the outline application. Again, even if the appeal was to be allowed there will be pre-commencement conditions and a reserved matters application for the approval of the layout, scale, appearance, landscaping and access. These would then have to be submitted before any works could begin on this site. It is on this basis that we consider that the Council's trajectory for ST8 is somewhat unrealistic.

ST14 and ST15

- 1.27 As already noted, ST14 has a projected capacity of 1,348 dwellings and ST15 of 3,339 dwellings and that no planning application has been made on either of these sites yet. Based on the Lichfields' report on housing delivery, it is highly likely that delivery from these sites will occur until 2026/27.
- 1.28 Based on the evidence set out above, we have produced a revised housing trajectory table contained at **Appendix 1** of this response.
- 1.29 In conclusion it is worth noting that the Lichfield report states that:

“Large sites can deliver more homes per year over a longer time period, with this seeming to ramp up beyond year five of the development on sites of 2,000+ units. However, on average these longer-term sites also have longer lead-in times. Therefore, short term boosts in supply, where needed, are likely to also require a good mix of smaller sites.”

- 1.30 It is plain that in York there is a significant problem with regard to affordability and a significant shortfall in the delivery of both market and affordable housing. As such, the Council needs to provide a step-change in their housing supply as soon as possible. This is not remedied by the Plan. Therefore, the provision of more small and medium sized sites, alongside the larger sites, would provide the short-term boost in supply the Council so desperately needs, whilst the larger strategic sites would significantly boost the housing supply in the longer term.

Five-year Housing Land Supply

Question 5.8

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

- 1.31 We have produced a revised trajectory table which reflects our comments to question 5.6 and, in our opinion, now demonstrates a more realistic housing trajectory. The revised housing trajectory table can be found at **Appendix 1**.
- 1.32 We have deducted the following number of dwellings from the 5-year housing land supply calculation.

Site	Council's Yield	DPP's Yield	Deduction in Dwellings from 5-year supply
ST4 – Land adjacent Hull Road and Grimston Bar	105	35	-70
ST5 – York Central	366	0	-366
ST8 – Land North of Monks Cross	245	35	-210
ST14 – Land West of Wigginton Road	210	0	-210
ST14 – Land West of Elvington Lane	105	0	-105
ST17 – Nestle South (Phase 2)	150	100	-50
ST31 – Tadcaster Road, Copmanthorpe	105	0	-105
Total	1,286	170	-1,116

Table 3 - Deduction of Dwellings from 5-year Supply Calculation based on revised Trajectory at Appendix 1

- 1.33 The table below shows the calculation of the 5-year supply against the current target of 822dpa. It is our view that it would fall at 4.84 years as shown in the table below.

Five Year Housing Land Supply Calculation		DPP Position
A	Annual Housing Requirement	822
B	Cumulative 5-Year Housing Requirement – no adjustment (A x 5)	4,110
C	20% buffer added (B x 1.2)	4,932
D	Annual target for next 5 years (C ÷ 5)	986
E	Current Expected Deliverable Supply (Including site allocations and unimplemented consents with 10% non-implementation rate applied + windfalls)	4,774
F	Under/Over Supply (C – E)	-158
City of York Council Housing Land Supply (E ÷ D)		4.84 years

Table 4 - 5-year Supply Calculation against 822dpa using revised Trajectory at Appendix 1

- 1.34 Notwithstanding this, we have demonstrated throughout our response that the housing requirement should be significantly increased to around 1,000 dwelling per annum to take account of market signals and the Council's planned economic growth, any additional provision for under delivery and the need to provide additional affordable accommodation. As such, we have undertaken a further exercise to calculate the 5-year housing land supply position with the higher housing requirement of 1,000 dwellings per annum. Our calculations are set out below.

Five Year Housing Land Supply Calculation		DPP Position
A	Annual Housing Requirement	1,000
B	Cumulative 5-Year Housing Requirement – no adjustment (A x 5)	5,000
C	20% buffer added (B x 1.2)	6,000
D	Annual target for next 5 years (C ÷ 5)	1,200
E	Current Expected Deliverable Supply (Including site allocations and unimplemented consents with 10% non-implementation rate applied + windfalls)	4,774
F	Under/Over Supply (C – E)	-1,226
City of York Council Housing Land Supply (E ÷ D)		3.98 years

Table 5 - 5-year Supply Calculation against 1000dpa using revised Trajectory at Appendix 1

- 1.35 As demonstrated in the table above, against a housing requirement of around 1,000 dwellings the Plan would not have a 5-year housing land supply and instead would stand at 3.98 years therefore highlighting the need to allocate more land for housing..

Conclusion

- 1.36 Whilst delivery has varied over the years it is clear that the Plan’s housing requirement and indeed a greater annual requirement is capable of being delivered in York. We have concerns that the windfall rate as proposed in the Trajectory is not evidenced and the Trajectory is overly ambitious and includes clear errors. As a result, we consider that the Plan is not justified and will not be effective, it has not been positively prepared and is not consistent with national guidance.

Modification

- 1.37 To make the Plan sound we consider that the windfall rate needs to be reduced at last to tie in with the evidence base, the housing trajectory needs to be made realistic, and above all the Plan needs to identify more land for housing to meet the needs of the district and that there is a need to provide more smaller and medium sized sites to contribute to meet the short-term housing needs that York so desperately requires.

Suggested Amendments to Housing Trajectory

Site	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	Post 2038
ST4 - Land adjacent Hull Road and Grimston Bar	0	0	0	0	35	35	35	35	35	36	0	0	0	0	0	0	0	0
ST5 – York Central	0	0	0	0	0	45	214	0	214	0	119	119	119	143	143	143	143	979
ST8 – Land North of Monks Cross	0	0	0	0	35	70	70	70	105	105	105	105	105	105	93	0	0	0
ST14 – Land West of Wigginton Road	0	0	0	0	0	35	70	105	105	105	105	105	105	105	105	105	105	193
ST15 – Land West of Elvington Lane	0	0	0	0	0	35	70	105	105	105	140	210	210	280	280	280	280	1,239
ST17 – Nestle South (Phase 2)	0	0	0	100	0	100	50	50	50	50	25	0	0	0	0	0	0	0
ST31 – Tadcaster Road, Copmanthorpe	0	0	0	0	0	35	35	35	35	18	0	0	0	0	0	0	0	0