

City of York Council
Examination of the City of York Local Plan
2017 – 2033

Phase 2 Hearings

Matter 5

Housing Land Supply

SUBMISSION ON BEHALF OF:

Galtres Garden Village Development Company

RESPONSE ON 5 YEAR LAND SUPPLY

May 2022



Chartered Town Planning Consultants

CONTENTS

Response to Council's 5-year land supply

REF: 220227.gvdc.exam2

MATTER 5 – Housing Land Supply

This note provides a response to the Council's 5-year land supply calculation set out in the Council's response to the Inspector's questions on Matter 5

This note does not present new evidence. It draws together evidence already submitted in various documents that we will be referenced in the discussion on matter 5.

Notes

- 1 The Council's estimate of the backlog for the period 2012/13 to 2017/18 appears to be incorrect. Total completions in that period were 3,432 - as set out first bullet on paragraph 5.7.2 of the Council's response on matter 2. The requirement for that period is 3950 (790 x 5). The deficit (backlog) is therefore 518 (3,950 - 3,432). The annual backlog figure for the 12 years remaining of the plan period is therefore 43 (518 ÷ 12), not 32.
- 2 The Council's calculation of total completions does not match the data in Table 7 of the Council's *Half Year Housing Monitoring Update for Monitoring Year 2021/22*. In that document the completion figures for 2017-2020/21 are 2,927 units, not 3,113 as stated in 5.7.2 of the Council's response on matter 5.
- 3 The Council put the base date of the 5 year calculation table as 01.04.22. However, the completion data and assumed future completion data in the table has a base date of 31.03.21 and 01.04.21 respectively.
- 4 Some of the tables on the following pages are derived from evidence already submitted.
Table 1 is sourced from our response to Matter 2
Table 2 is a variation of the amended calculation of the Housing Delivery Trajectory appended to our response on Matter 5. The table has been amended to correlate with Appendix 1 of the Council's response on Matter 5 but includes our amendments to the trajectory. We have

been conservative with our amendments to the trajectory to reduce areas of disagreement with the Council. We believe that some of our estimates of completions on some strategic sites could be pushed further into the plan period to give a more realistic position on delivery. (We do not question principle of any of the allocations, merely the timing of delivery).

- Table 2A is a variation of table 2 but with student completions excluded from completions, hence resulting in a larger backlog to be accommodated.
- Table 3 is our variation of the Council's 5-year supply calculation based on our Table 2 – i.e. Council's estimate of backlog corrected and housing completion figures incorporating our revised trajectory.
- Table 3A is our variation of the 5-year supply calculation based on our Table 2A – i.e. student accommodation excluded from completions and housing completion figures incorporating our revised trajectory.
- Table 4 reproduces Table 5 from our representations on the 2021 Modifications to the Local Plan.

Table 1 - Backlog assuming OAN of 790

A	B	C	D	E	F	G	H
Year	Net Dwellings Added (Council Figures)	Less student units	Net C3 Dwelling units	Local PLAn Mod OAN	Backlog/ Surplus incl students	Backlog/ Surplus excl students	Housing delivery test indicator excl students
2012/13	482	0	482	790	-308	-308	61.00%
2013/14	345	0	345	790	-445	-445	43.70%
2014/15	507	0	507	790	-283	-283	64.20%
2015/16	1121	579	542	790	331	-248	68.60%
2016/17	977	152	825	790	187	35	104.40%
2012/17	3432	731	2701	3950	-518	-1249	
2017/18	1296	637	659	790	506	-131	83.40%
2018/19	449	40	409	790	-341	-381	51.80%
2019/20	560	39	521	790	-230	-269	65.90%
2020/21	622	19	603	790	-168	-187	76.30%
2017/21	2927	735	2192	3160	-233	-968	
Total	6,359	1,466	4,893	7,110	-751	-2,217	68.80%

Source: Council Housing Monitoring Updates

Table 2 Five Year Housing Land Supply Sites (Base date 01/04/21) Trajectory & Backlog changes

	(Dark Green highlights indicate changes made to Council calculation)	TOTAL	21/22	22/23	23/24	24/25	25/26
Housing Allocations Below 5 ha (H Sites)							
H1a & b	Former Gas Works, 24 Heworth Green (National Grid Properties)	607				215	
H3	Burnholme School	72		35	37		
H5	Lowfield School	165	85	71	6		
H7	Bootham Crescent	93		15	35	35	8
H8	Askham Bar Park & Ride	60					35
H10	The Barbican	187					
H20	Former Oakhaven EPH ?	56			35	21	
H29	Land at Moor Lane Copmanthorpe	88			35	35	18
H31	Eastfield Lane Dunnington	76		35	35	6	
H38	Land RO Rufforth Primary School Rufforth	33			18	15	
H39	North of Church Lane Elvington	32			17	15	
H46	Land to North of Willow Bank and East of Haxby Road, New Earswick	104			35	35	34
H52	Willow House EPH, 34 Long Close Lane	15			15		
H53	Land at Knapton Village	4			4		
H55	Land at Layerthorpe	20				20	
H56	Land at Hull Road	69	69				
H58	Clifton Without Primary school	25			15	10	
Annualised Projected Completions H Sites (Hide)			154	156	287	407	95
Housing allocations above 5ha (ST Sites)							
ST1a	British Sugar/Manor School	1100					
ST1b	Manor School	100					
ST2	Former Civil Service Sports Ground Millfield Lane	266		48	48	48	48
ST4	Land Adj. Hull Road and Grimston Bar	211				35	35
ST5	York Central	2500				45	107
ST7	Land East of Metcalfe Lane	845				35	35
ST8	Land North of Monks Cross	968				35	70
ST9	Land North of Haxby	735					35
ST14	Land to West of Wigginton Road	1348					35
ST15	Land to West of Elvington Lane	3339				35	35
ST16	Terrys Extension Site - Terrys Clock Tower (Phase 1)	22	10	12			
ST16	Terrys Extension Site - Terrys Car park (Phase 2)	33			17	16	
ST16	Terrys Extension Site - Land to rear of Terrys Factory (Phase 3)	0					
ST17	Nestle South (Phase 1)	279			35	244	
ST17	Nestle South (Phase 2)	425				50	50
ST31	Land to the South of Tadcaster Road, Copmanthorpe	158			35	35	35
ST32	Hungate (Phases 5+) (Blocks D & H)	375					196
ST33	Station Yard Wheldarke	147			35	35	35
ST36	Imphal Barracks, Fulford Road	769					
Annualised projected Completions for ST Sites			10	60	170	613	716
Projected Housing Completions From Non Allocated Unimplemented Consents							
Total		1853	298	459	543	112	223
Projected completions from communal establishments and student accommodation							
Total		720	183	469	62	0	6
Detailed Trajectory (incl 10% Non-implementation Rate)							
A	Annual Housing requirement		790	790	790	790	790
B	Cululative Housing requirement (Row A x 50)		790	1580	2370	3160	3950
C	Inherited Shortfall over plan period (2012-2017)		43	43	43	43	43
D	Additional shortfall Taking account of completions from 2017/18 to 2020/21		19	19	19	19	19
E	Residual shortfall (2012/2021) (Row B + C)		62	62	62	62	62
F	Annual Requirement inclusive of shortfall (Row A + E)		852	852	852	852	852
G	Cumulative annual requirement inclusive of shortfall (Row F + previous year Row G)		852	1704	2556	3408	4260
H	Projected Completions (all Sites annual totals)		645	1144	1062	1132	1040
I	Projected completions all sites 10% non implementation rate applied (Row H x 0.9)		581	1030	956	1019	936
J	Windfall Allowance (Councils figure)					196	196
K	Total Projected Completions (with 10% Non implementation rate applied and windfalls) + Actual completions 2017-2020 (Row I + Row J)		581	1030	956	1215	1132
L	Cumulative Completions (with 10% non implementation rate applied and windfalls) Row K + previous year cumulative completion Row L)		581	1610	2566	3781	4913
M	Over/Under Supply of Housing (Cumulative completions - cumulative annual target) (Row K - Row G)		-272	-94	10	373	653
N	20% Buffer (Row F x 0.2)		167	167	167	167	167
O	Cumulative Target (Row G + cumulative 167)		1019	2039	3058	4078	5097
P	Surplus (in that year) (Row O - Row L)		-439	-429	-492	-297	-184

Table 2A Five Year Housing Land Supply Sites (Base date 1st April 2021) Trajectory changes; & backlog excl students

	(Dark Green highlights indicate changes made to Council calculation)	TOTAL	21/22	22/23	23/24	24/25	25/26
Housing Allocations Below 5 ha (H Sites)							
H1a & b	Former Gas Works, 24 Heworth Green (National Grid Properties)	607				215	
H3	Burnholme School	72		35	37		
H5	Lowfield School	165	85	71	6		
H7	Bootham Crescent	93		15	35	35	8
H8	Askham Bar Park & Ride	60					35
H10	The Barbican	187					
H20	Former Oakhaven EPH ?	56			35	21	
H29	Land at Moor Lane Copmanthorpe	88			35	35	18
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H38	Land RO Rufforth Primary School Rufforth	33			18	15	
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H46	Land to North of Willow Bank and East of Haxby Road, New Earswick	104			35	35	34
H52	Willow House EPH, 34 Long Close Lane	15			15		
H53	Land at Knapton Village	4			4		
H55	Land at Layerthorpe	20				20	
H56	Land at Hull Road	69	69				
H58	Clifton Without Primary school	25			15	10	
Annualised Projected Completions H Sites (Hide)			154	156	287	407	95
Housing allocations above 5ha (ST Sites)							
ST1a	British Sugar/Manor School	1100					
ST1b	Manor School	100					
ST2	Former Civil Service Sports Ground Millfield Lane	266		48	48	48	48
ST4	Land Adj. Hull Road and Grimston Bar	211				35	35
ST5	York Central	2500				45	107
ST7	Land East of Metcalfe Lane	845				35	35
ST8	Land North of Monks Cross	968				35	70
ST9	Land North of Haxby	735					35
ST14	Land to West of Wigginton Road	1348					35
ST15	Land to West of Elvington Lane	3339				35	35
ST16	Terrys Extension Site - Terrys Clock Tower (Phase 1)	22	10	12			
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ST17	Nestle South (Phase 1)	279			35	244	
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Annualised projected Completions for ST Sites			10	60	170	613	716
Projected Housing Completions From Non Allocated Unimplemented Consents							
Total		1853	298	459	543	112	223
Projected completions from communal establishments and student accommodation							
Total		720	183	469	62	0	6
Detailed Trajectory (incl 10% Non-implementation Rate)							
Annual Housing requirement		790		790	790	790	790
Cululative Housing requirement (Row A x 50)		790		1580	2370	3160	3950
Inherited Shortfall over plan period (2012-2017)		104		104	104	104	104
Additional shortfall Taking account of completions from 2017/18 to 2020/21		81		81	81	81	81
Residual shortfall (2012/2021) (Row B + C)		185		185	185	185	185
Annual Requirement inclusive of shortfall (Row A + E)		975		975	975	975	975
Cumulative annual requirement inclusive of shortfall (Row F + previous year Row G)		975		1950	2925	3900	4875
Projected Completions (all Sites annual totals)		645		1144	1062	1132	1040
Projected completions all sites 10% non implementation rate applied (Row H x 0.9)		581		1030	956	1019	936
Windfall Allowance (Councils figure)						196	196
Total Projected Completions (with 10% Non implementation rate applied and windfalls) + Actual completions 2017-2020 (Row I + Row J)		581		1030	956	1215	1132
Cumulative Completions (with 10% non implementation rate applied and windfalls) Row K + previous year cumulative completion Row L)		581		1610	2566	3781	4913
Over/Under Supply of Housing (Cumulative completions - cumulative annual target) (Row K - Row G)		-395		-340	-359	-119	38
20% Buffer (Row F x 0.2)		167		167	167	167	167
Cumulative Target (Row G + cumulative 167)		1142		2285	3427	4570	5712
Surplus (in that year) (Row O - Row L)		-562		-675	-861	-789	-799

Table 3 5-year supply calculation with corrected residual and dwelling completions based on amended trajectory in Table 2 above

Five year Housing land Supply Calculations (Base 01.04.21)			Notes
A	Annual housing requirement across plan period	790	
B	Cumulative housing requirement (2021/22 to 2025/26)	3950	
C	Residual Shortfall 2012/13 to 2020/21 (Including Student completions)	313	Table 1. Total from column F $((751 \div 12) \times 5)$
D	Cumulative housing requirement plus shortfall	4263	
E	Total dwellings estimated to be completed (all site allocations plus 10% non implementation rate applied)	4913	Table 2
F	Under over supply of housing RowE-D	650	
G	20% Buffer for flexibility	837	
H	Remaining supply of housing	-187	
	CYC land supply for period 2021/22 to 2021/26	4.82	

Table 3A 5-year supply calculation with corrected residual Shortfall excluding student completions and dwelling completions based on amended trajectory in Table 2A above

Five year Housing land Supply Calculations (Base 01.04.21)			Notes
A	Annual housing requirement across plan period	790	
B	Cumulative housing requirement (2021/22 to 2025/26)	3950	
C	Residual Shortfall 2012/13 to 2020/21 (Including Student completions)	924	Table 1. Total from column G $((2217 \div 12) \times 5)$
D	Cumulative housing requirement plus shortfall	4874	
E	Total dwellings estimated to be completed (all site allocations plus 10% non implementation rate applied)	4913	
F	Under over supply of housing RowE-D	39	
G	20% Buffer for flexibility	837	
H	Remaining supply of housing	-798	
	CYC land supply for period 2021/22 to 2021/26	4.30	

**Table 4 –
Actual Affordable housing delivery and net change in affordable stock 2013-2019**

Year	Net Housing Completions*	All affordable Housing Completions (resulting from planning consent)	% of All AH Completions Compared to All Net Housing Completions	Right to buy sales	Net change in affordable housing stock
2013/14	345	43	12.46%	53	-10
2014/15	507	129	25.44%	52	77
2015/16	1121	109	9.72%	68	41
2016/17	977	90	9.21%	79	11
2017/18	1296	45	3.47%	72	-27
2018/19	449	45	10.02%	60	-15
Totals 2013-18	4695	461	9.82%	384	77

* Councils figures include student housing

Source: Table 12 from Councils Affordable Housing Note EX/CYC/36 and Council's Housing Monitoring data.