



Evidence Base

City of York

LDF Local
Development
Framework

Strategic Housing Land Availability Assessment Methodology

Consultation Draft
February 2007

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1 INTRODUCTION AND THE ROLE OF THE HOUSING LAND AVAILABILITY ASSESSMENT

- 1.1 The Housing Land Availability Assessment (HLAA) was introduced in draft PPS3¹ in December 2005. At the same time, draft guidance² on the production of HLAA's was also published which builds upon the previous release of "Tapping the Potential"³ (2000). The main change to the process taken between the two documents has been a new focus on a sub-regional approach co-ordinated by the regional bodies. The other main change is that previous urban capacity studies identified sites just within main urban areas and there is now a recognition that smaller settlements could contribute to the overall supply of land. The HLA assessment draft guidance (2005) therefore has been revised to advise that all smaller and rural areas are included within the study to gain a better estimate of housing potential. The revised draft guidance also considers that timescales should now be applied to the sites that are identified by the study so that the release of land can be managed more effectively
- 1.2 The South East England Regional Assembly enlisted Baker Associates to write their regional guidance which was called "Assessing Urban Housing Potential – A Good Practice Guide". This guidance reworks the methodology of 'Tapping the Potential' and splits the approach into logical steps for the identification, planning and monitoring the potential for housing land. Whilst this document is concerned primarily with the urban focus, it also offers good insight into broadening the approach to include the whole area now required by the government through redefining the boundaries and settlements used within previous studies. The Yorkshire and Humber Assembly released guidance in 2002, which was appraised for progress by Baker Associates in 2004 and concludes that a range of approaches can be taken so the guidance should be used to inform judgements of how each authority tackles the study.
- 1.3 The HLAA provides information on the opportunities that exist to meet future housing need within the identified area. The information from the HLAA will be used to inform the Core Strategy Development Plan Document (DPD). The Core Strategy will set out the key elements of the planning framework for City of York including the spatial vision for the authority's area and the strategic policies required to deliver that vision.
- 1.4 A HLAA is not intended to do the job of a Development Plan Document. Whilst it will identify land it will not make a judgement about whether a site is developable or not. The role of the housing land availability assessment is to identify potential sites and their constraints and for the plan making process to assess these constraints and to make a judgement as to the extent to which they are developable. Equally, the assessment will not make any judgements about whether a site offers the most sustainable location for development – again this is a matter for the plan making process which will have to weigh the merits of different sites according to economic, social and environmental costs and benefits. The HLAA simply forms part of the evidence base for the Plan.

¹ Draft Planning Policy Statement 3 Annex B (December 2005), ODPM

² Housing Land Availability Assessments: Identifying appropriate land for housing development – draft practice guidance (December 2005), ODPM

³ Tapping the Potential (December 2000), DETR

1.5 City of York produced an 'Urban Capacity Study' in 2003. The study identified future sites for development and assessed their best possible use by using criteria based on the applicable government guidance. The level of detail produced in this report was hindered by time and resource constraints but the report did produce useful sites for consideration in the Local Plan. It was decided that sites identified through this process would have more detailed analysis at the design stage if and when the sites came forward for development. This 2003 Urban Capacity Study fed into the site allocation process for the City of York Local Plan, of which now many sites have been developed out. The Urban Capacity Study was based upon guidance contained in tapping the potential. This guidance will be superseded once the HLAA guidance is finalised.

1.6 The key aims of an HLAA are to:

- assess the level of unimplemented permissions and their likelihood of being brought forward to completion in the plan period;
- assess land availability by identifying sites that have development potential for housing and assess the level of potential;
- evaluate past trends in windfall sites⁴ coming forward for development and estimate the likely future implementation rate;
- assess developability by identifying constraints that may make the site unavailable or unviable for development;
- identify sustainability issues and physical constraints that may make the site unsuitable for development; and
- identify interventions that could be made to overcome constraints on particular sites.

1.7 The new planning system introduced by the Government in 2004 requires all authorities to replace their existing plans with LDFs over the next few years whilst keeping any adopted or approved documents for interim planning decisions. The requirement of City of York Council to put together the LDF means that the council will produce a suite of documents that cover a range of planning issues with a view that each document can be reviewed and updated on a more frequent and flexible basis to reflect current trends and emerging patterns. The LDF is based heavily on evidence and research, which will be used to inform development plan documents and help make robust policies brought forward through the LDF process as well as monitor their progress in the future.

1.8 Planning Policy Statement 3 (PPS3)⁵ sets out a new approach for planning for housing, including the identification of sufficient land for the plan period of 15 years, ensuring that the first 5 years are allocated and developable and that the 5-year supply is maintained as sites are developed out. The new Planning Policy Statement 3 (housing) states that guidance on strategic housing land availability assessments is being produced in association with the Local Government Association and the Home Builders Federation and the

⁴ Windfall sites are those, which have not been specifically identified as available in the local plan process. They comprise previously developed sites that have unexpectedly become available. These could include, for example, large sites resulting from, for example, a factory closure or small sites such as a residential conversion or a new flat over a shop.

⁵ Planning Policy Statement 3 (PPS3): Housing, November 2006, Communities and Local Government: London.

aim is to publish the guidance early in 2007. Advice sought from both Communities and Local Government and the Government Office for Yorkshire and the Humber suggests that the published guidance will not differ greatly from the consultation draft and that Local Authorities should base their studies as close as possible to the draft guidance.

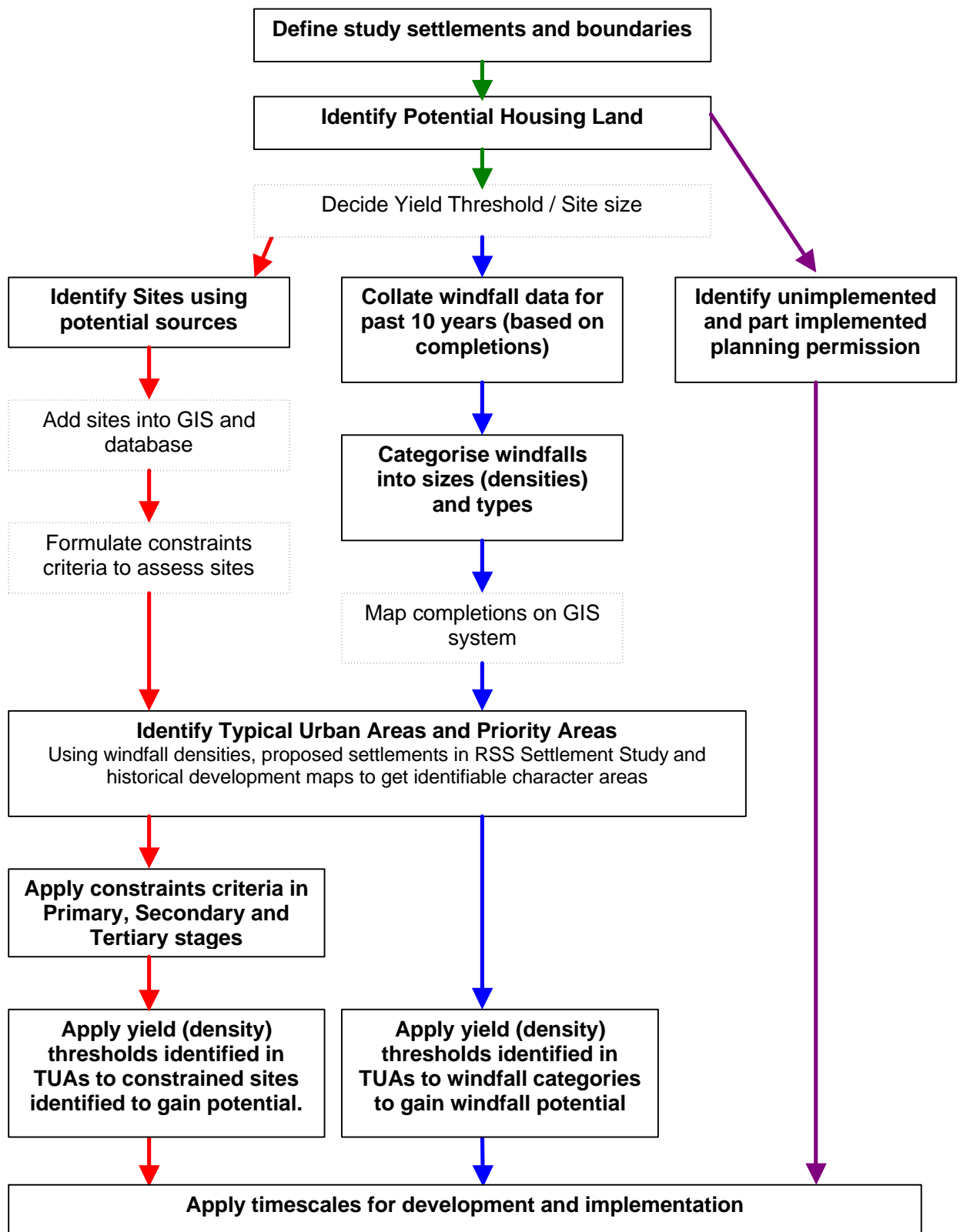
- 1.9 The HLA assessment is seen as a key study for the LDF evidence base as it is the responsibility of this document to identify potential housing sites for development. Primarily the study will be used to inform the City of York LDF Allocations Development Plan Document⁶ which will identify and allocate sites for development to meet communities' needs for homes, jobs and services whilst protecting any valued environmental areas.
- 1.10 The emerging Regional Spatial Strategy has already acknowledged York's housing growth up until 2016 and included yearly targets for development. Likewise the 2003 based population and household projections⁷ suggest that York will need to accommodate a substantial growth in both population and households for the projected future. The LDF will therefore be used as a key mechanism for the delivery and distribution of homes across the authority, which will be supported by this assessment of housing potential within the authority.
- 1.11 It has been 4 years since much of the work was undertaken for the previous study and the release of new guidance for undertaking the HLA assessment. Changing expectations in the new guidance as to what should be included have been taken into consideration by CYC and given that many of the previously identified site allocations have been developed out, it has been decided that a new comprehensive study be carried out for housing land potential rather than an update to the previous study.
- 1.12 The particular methodical approach taken by City of York Council is based upon:
1. The advice in the national and regional best practice documents;
 2. The experience of other authorities;
 3. The emerging Regional Spatial Strategy;
 4. Time and resource availability constraints.

⁶ To be published in Autumn 2007.

⁷ Released in April 2006 by the Office of National Statistics.

2 METHODOLOGY

2.1 Summary Flow Diagram



2.2 Phasing of the Housing Land Availability Assessment

- 2.2.1 The HLA assessment will take place in two phases. This document represents the first phase whereby the Council will identify sites based upon sources known to them within the urban area and the Local Service Centres⁸ and use these sources to estimate future potential capacity.
- 2.2.2 The second phase will be a call for sites, which will take place in conjunction with the production of the allocations document for the LDF. New sites brought forward as part of this process will be assessed by same methodology as in phase 1 to inform the allocations process.

2.3 Establishing the process with partners

- 2.3.1 Local authorities are expected to establish links with partners (statutory bodies, local organisations e.t.c) in order to agree the methodology of the assessment. Consultees⁹ will be asked to comment on the methodology, in particular, the thresholds for identifying sites, the proposed stages of the assessment, the windfall thresholds and discounts and the constraints criteria. The consultation on this draft methodology is to allow partners to raise any issues with the methodology proposed.
- 2.3.2 The proposal is to have a second round of consultation on a much wider scale later on in 2007. This is will involve a call for sites which will take place in conjunction with the production of the Allocations Development Plan Document. At this stage we will contact a wide range of landowners and agents in order to help identify sites that may become available for development up to 2029. This will assist us in the identification of sites, as it will utilize the knowledge of the landowners and agents on the availability of sites and any issues regarding their development. New sites that are identified as part of this consultation will be assessed using the same methodology as in phase 1.

2.4 Identifying the geographical area

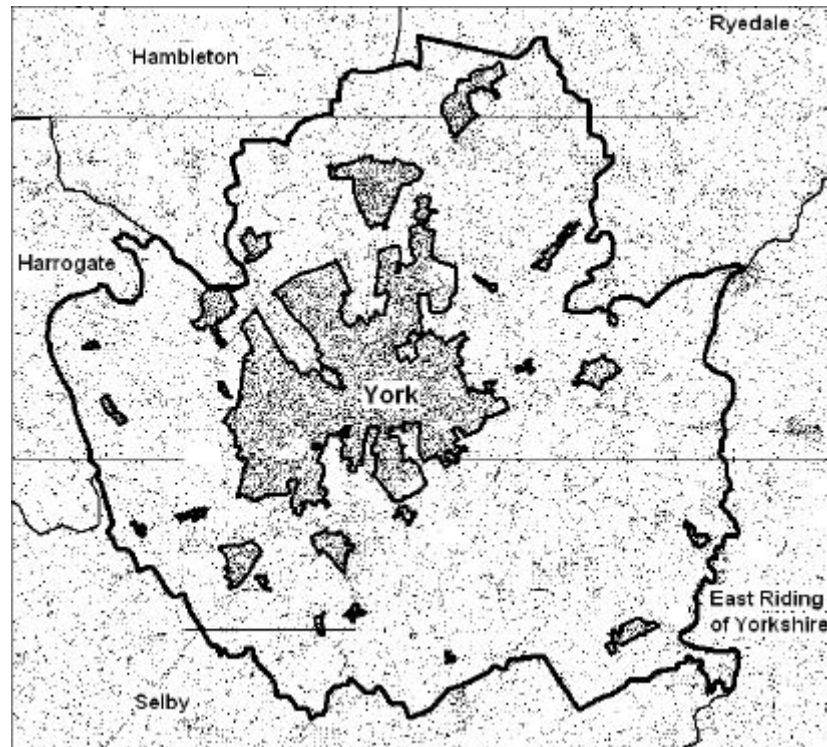
- 2.4.1 The Housing Land Availability Guidance (2005) has changed the scope of assessments to cover all potential housing supply sources. This has also changed the geographical scope of the document to include rural as well as urban areas as potential sources of supply and has stated that ideally the study should be undertaken at a sub-regional level.
- 2.4.2 Having taken these elements on board City of York Council contacted some surrounding Local Authorities and found that the majority has already undertaken housing supply assessments more recently than City of York and used the results to feed in to the LDF documents. Also it has been considered that the RSS covers housing potential and distribution effectively in the emerging strategy with the recognition of the York sub-regional area having it's own chapter and themes.
- 2.4.3 In light of the change in policy requirements and the need to undertake a HLA assessment, City of York Council will be using it's own authority boundary to

⁸ Local Service Centres as per the settlement study for the Draft Yorkshire and Humber Regional Spatial Strategy, June 2004.

⁹ Please see appendix for full list of consultees.

define the study area. Figure 2.1 outlines the boundary and settlements that will be included.

Figure 2.1:
Boundary of area studied



- 2.4.4 Where the HLAA is undertaken for a local authority area it *“should identify all settlements where housing could be provided, not just the main urban areas. The intention here is not to make a judgement about whether a place would be appropriate for housing or not. This is the role of the plan making process and Sustainability Appraisal. It is important to take a wide and objective look at all potential sources of housing”*
- 2.4.5 The areas that will be assessed in this HLAA is the main urban area of York and the local service centres as identified in the settlement study undertaken for the Draft Yorkshire and Humber Regional Spatial Strategy, June 2004. These local service centres are Strensall and Towthorpe, Haxby and Wigginton, Upper and Nether Poppleton, Bishopthorpe, Copmanthorpe and Dunnington. Section 2.6 of this methodology gives further information about how the different areas will be assessed.
- 2.4.6 It is proposed that at this stage we will not assess the capacity for additional development outside of the existing built up area of the city and local service centres. This will be addressed after the completion of the HLAA if additional capacity over and above that identified within the main urban area and local service centres is required. This hierarchy for development is in line with the emerging Regional Spatial Strategy for Yorkshire and the Humber. The approach taken in the draft RSS regarding the location of development is that in distributing land for development local planning authorities will concentrate the majority of new development and redevelopment on the Regional and Sub Regional Centres and allow limited development to take place in Local service Centres with a focus on meeting local needs for affordable housing and economic diversification.

2.5 Considering the sources of supply

- 2.5.1 The next step in the assessment is to identify all potential sources of housing supply within the areas of search. Both national and regional guidance list a range of sources from which to use to identify sources of potential housing land and recommends that as many sources are included as possible. The guidance suggests twelve sources are surveyed for their potential (see figure 2.2). It should be noted that primarily the focus is upon developing previously developed land (brownfield sites) in line with PPG3.
- 2.5.2 These sources of supply will not all be capable of inclusion in the site allocations DPD. Some of these sources are better suited for identification as broad areas for future development (in the core strategy) or to contribute to determining a realistic windfall allowance. The output of the assessment will provide the evidence base for the following elements of the housing policies:
- Allocation of first 5 years of supply in a site allocation development plan document
 - Allocation/broad identification of a further 10 years of supply for future development
 - Determination of a realistic windfall allowance, where appropriate.

Figure 2.2: Sources of supply recommended by HLA guidance (2005)

- Previously developed vacant and derelict land and buildings
- The subdivision of existing housing
- Flats over shops
- Empty homes
- Intensification of existing areas
- Redevelopment of existing housing
- Previously developed vacant and derelict land and buildings (non housing)
- Redevelopment of Car parks
- Conversion of commercial buildings
- Unimplemented/ Outstanding planning permissions
- Review of existing housing allocations in plan
- Review of their existing allocations in plan
- Land not previously developed including greenfield sites.

- 2.5.3 To keep in line with the guidance City of York Council will cover each of the categories above except empty homes. It is the aim of this housing land availability assessment to estimate the contribution of housing land which will help to meet regionally derived housing targets. The Regional guide states that including the empty homes source would result in double counting since the requirement set out in the RSS is already discounted based on an assumed reduction in empty homes.

2.6 How do we identify opportunities for each source?

- 2.6.1 In undertaking the survey work there is firstly an issue of what site threshold to use. It is important that the threshold chosen does not rule out any significant sources of supply and whilst the guidance does not offer

suggested sites sizes, it does note that local flexibility of the size criterion is necessary.

2.6.2 The previous urban capacity study uses a threshold of 0.2 hectares (ha) as a threshold for site identification. The Development Control Local Plan has used a threshold of 0.4 ha for allocating certain sites which corresponds to some other Local Authorities HLA assessments. However, Bradford Council have acknowledged that a threshold of 0.4 ha would result in a significant amount of potential in their authority going unrecorded. This argument can also be used for York where small sites can often offer large potential. The draft HLAA guidance advises that authorities should be wary of setting too high a site threshold as this may make it difficult to allocate land for the longer term in the plan-making process. Suitable sites that are not allocated in the plan may emerge as windfalls. However, smaller sites are also worth considering for allocation because a range of small development sites provides greater choice for home buyers and developers and also encourages competition between developers building on different sites.

2.6.3 Taking these arguments into account, City of York Council are proposing to use a site threshold of 0.2 hectares to identify sites. Sites below this threshold will be identified using windfall completions (very small windfalls), which will then be projected forward to obtain a gross potential yield.

2.6.4 To keep in line with guidance and other authorities work City of York Council are proposing to cover each category in figure 2.2 in the following way:

	Site Size Threshold	Sources covered from figure 2.5
1. Site identification and survey	0.2 ha and above	<ul style="list-style-type: none"> • Intensification of existing areas; • Redevelopment of existing housing; • Redevelopment of car parks; • Conversions of commercial buildings; • Review of existing housing allocations; • Review of other allocations in Plan • Land not previously developed including greenfield sites.
2. Windfalls (i): Very Small (0.2ha and below) Small (0.2 –0.4 ha) Medium (0.4-1ha) Changes of use Conversions	1 ha and below	<ul style="list-style-type: none"> • Subdivision of existing housing; • Flats above shops; • Intensification of existing areas; • Redevelopment of existing housing; • Redevelopment of car parks; • Conversions of commercial buildings.
3. Windfalls (ii) Large (1ha and above)	Above 1 ha	<ul style="list-style-type: none"> • As above
4. Unimplemented Planning permissions	N/a	<ul style="list-style-type: none"> • Unimplemented/outstanding planning applications

Each of these main categories have a different methodology which will be discussed separately.

2.7 Site Identification

2.7.1 A variety of sources have been used to compile a list of sites for surveying. These sources are listed below:

- 1) Local Plan allocations: Identify outstanding sites allocated in the local plan for housing. Sites allocated in the Local Plan for employment will also be identified to determine if they would be more suitably reallocated for residential or mixed use redevelopment;
- 2) Desk-based site identification: Maps to be analysed in built up areas at 1:2500 and other areas at 1:5000 using MapInfo. All areas that appear to have potential for development or that warrant further investigation to be identified for survey,
- 3) The National Land Use Database (NLUD)
- 4) City of York Council Community Services
- 5) City of York Council Property Services
- 6) Alternative housing sites suggested at Local Plan Changes 3
- 7) New brownfield sites coming forward, e.g. Terrys Factory, British Sugar, Nestle.
- 8) Sites suggested at the 2006 Housing Inquiries for Metcalfe Lane and Germany Beck.
- 9) Employment Land Review
- 10) Sites identified internally by City Development Officers.

2.7.2 As outlined in section 2.2 a call for potential housing sites will also take place as part of Phase 2 of this document to be completed in Autumn 2007.

2.7.3 The sites identified for survey will be put on to our GIS software MapInfo. Each site will have basic information such as location, site size and grid co-ordinates etc stored on a database and an associated site boundary produced on the map layer.

2.7.4 A site visit will be made to all identified sites to assess their suitability for housing development, taking account of the housing market, alternative possible land uses, the characteristics of each site and the constraints to development.

2.8 Carrying out the survey

2.8.1 This methodology proposes a comprehensive survey of the whole defined area. This type of survey will provide a great deal of useful information to inform both housing allocations in the Allocations DPD and for the wider identification of areas for future development and the likely windfall arising. This approach is also well suited to the ongoing monitoring of sites through compiling a database of all potential sites that can then be tracked. This will be well linked to the comprehensive housing and employment monitoring systems that we already have in place.

2.8.2 The comprehensive survey will be a mapping and recording exercise of the potential sources of housing supply. We are proposing to use a combination of aerial photographs and map analysis to identify sites. Site visits will then take place to look at the sites identified through the desk-top mapping exercise along with the other sites identified from the sources listed above in section 2.7.

2.9 Quantifying the Supply

Identified Sites: Applying constraints

- 2.9.1 The next stage of the assessment (although in practice information will be gathered simultaneously) is to consider and identify whether sites are genuinely available for development and are realistically developable in the short, medium or long term.
- 2.9.2 There may be good reasons why a proportion of the supply identified initially will not come forward for development, or may not be capable of development immediately. The survey will identify an 'unconstrained' supply figure. The unconstrained housing supply is the theoretical total number of dwellings that could be accommodated if all of the potential sources were developed optimally. The assessment of constraints is inherently judgmental and therefore it is important that this takes place after the unconstrained capacity has been identified. If this is not done then it becomes difficult to keep track of the assumptions made and to be able to explore different options in the plan making process under which sources of supply may be realized more effectively.
- 2.9.3 PPS3 requires sites for potential allocation to be both developable and deliverable and advises that this information should be drawn from the HLAA. To be considered developable a site should be in a suitable location for housing development and available at the appropriate time. To be considered deliverable a site should, at the point of adoption of the Local Development Document, be:
- **Available** – the site is available now
 - **Suitable** – the site offers a suitable location for development and would contribute to the creation of sustainable, mixed communities
 - **Achievable** – there is a reasonable prospect that housing will be delivered on the site within five years
- 2.9.4 Whether a site is developable or not is a matter to be considered as part of the plan making process through the Allocations DPD. The HLAA will identify the potential sites and their constraints and then the LDF process through the Allocations DPD will assess the constraints and make a judgment about the extent to which they are developable.
- 2.9.5 The guidance advises that the following constraints or factors should be taken into account for each site or source of potential housing supply. The information gathered at this stage can then be used during the preparation of the plan to determine which sites should be allocated in the first five years and the likely timing of these and further sites coming forward. This will be used to inform phasing and the rolling forward of the five year supply.
- 2.9.6 When identifying and considering issues it is important to distinguish advantages and disadvantages of the site under consideration, whether the

¹⁰ This included Copmanthorpe, Bishopthorpe, Nether/Upper Poppleton, Dunnington, Strensall/Towthorpe and Haxby/Wigginton.

issues are directly or indirectly related to the site and whether the issues are short, medium or long term.

2.9.7 When considering availability the guidance suggests that issues such as access, ground conditions, infrastructure, ownership and the existing land use should be assessed. In terms of the suitability of the site the guidance suggests that economic issues should be assessed, social issues such as accessibility and the needs of the community and environmental issues such as designations, air quality, pollution and flood risk should be assessed.

2.9.8 Taking the guidance into account we are proposing to use the constraints framework outlined in table 2.1 to assess the identified sites. Proformas will be completed for each site in conjunction with a specific site boundary/location map and be assessed against each of the criteria. If sites fails one of the primary constraints then the sites will not go forward to the secondary stage as these issues are considered too important to overlook for development. Those sites which fail to meet secondary constraints will be put as lower priority than those sites which do meet the criteria. The tertiary constraints are additional constraints to inform the process of selection at the allocations stage of the LDF and will not determine if a site reaches the final constrained potential in this assessment.

Table 2.1 – Constraints Framework

City Centre and other urban areas		
Primary Constraints	Secondary Constraints	Tertiary Constraints
Designations: <ul style="list-style-type: none"> • Openspace • National nature designations, Local nature designations, habitats of legally protected species • Conservation Area • Listed buildings • Scheduled Ancient Monuments 	<ul style="list-style-type: none"> • Flood risk assessed using Strategic Flood Risk Assessment • Accessibility to health, education, shops, leisure and community facilities (within 500-700m) • Access to very frequent public transport (up to every 15 minutes) within 500m 	<ul style="list-style-type: none"> • Brownfield/Greenfield site • Archaeological sites • Air quality Management Zone • Existing land use • Ownership issues • Contamination • Local services available • Routes and physical connectivity • Views and visual connectivity • Landscape quality/condition • Highway capacity • Education capacity
Local Service Centres		
Primary Constraints	Secondary Constraints	Tertiary Constraints
Designations: <ul style="list-style-type: none"> • Openspace • National nature designations, Local nature designations, habitats of legally protected species • Conservation Area • Listed buildings • Scheduled Ancient Monuments 	<ul style="list-style-type: none"> • Flood risk assessed using Strategic Flood Risk Assessment • Accessibility to health, education, shops, leisure and community facilities (within 600-800m) • Access to frequent public transport (up to every 30 minutes) within 800m 	<ul style="list-style-type: none"> • Brownfield/Greenfield site • Archaeological sites • Air quality Management Zone • Existing land use • Ownership • Contamination • Local services available • Routes and physical connectivity • Views and visual connectivity • Landscape quality/condition • Highway capacity • Education capacity

Considering Viability

2.9.9 There are a number of ways of assessing whether a development is viable. The most common form of assessment involves a development appraisal using the residual valuation method. This assumes that land values are determined 'residually' in the market place by developers. When negotiating with land owners, developers determine the price they are willing to pay for land based on the residual value after subtracting the estimated total costs of providing the intended development from its estimated revenues (i.e. the sale of the development). The landowner is likely to sell land to a developer if the residual value (i.e. the price the developer is willing to pay) of development is greater than its existing or alternative use. Market viability can be affected by a range of factors including national and local planning policy.

2.9.10 The options for assessing viability include:

- Categorising sites into levels of demand – sites attractive to the market, those likely to come forward with a little help and those unlikely to be developed in the longer term.
- Undertaking market analysis of case study areas comparing the cost of development with the values of the completed units.
- Undertaking independent financial appraisal of key sites.

2.9.11 It is proposed that at this stage (stage 1) of the HLAA we will not be considering the viability of identified sites. It is proposed that this assessment will be carried out after the second stage of the assessment (i.e. the call for sites) is complete. At this time we will also have the results of the Strategic Housing Market Assessment for York which is currently being undertaken on behalf of the council by Fordham Research. This report should be completed in June 2007. The aim of the assessment is to provide the authority with detailed information regarding how the market in York currently operates and forecasts for the future, including the modelling and analysis of different growth scenarios. The results of the assessment will help to set targets and thresholds for both market and affordable housing.

2.10 Estimating the yield from site-specific sources

2.10.1 Having identified the opportunities for additional housing the next stage is to assess the number of units that can be accommodated on each of the sites. Two methods for exploring the level of supply a site might yield are density multipliers or a design based approach:

1. density multipliers – using standard densities and multiplying them with the area of each site to obtain yields;
2. design-based approaches – designing layouts on a varying sample of the sites and applying the results to the remaining sites

2.10.2 There is the potential for a large number of sites to be identified in this study and therefore a design-based approach is likely to be extremely resource

intensive. We are proposing to use a design multiplier method for quantifying the supply based on an analysis of the city split up into typical urban areas. This method will allow us to vary the net density depending on the size of the site and the characteristics of the area, using a banding approach and to vary the density ranges depending on the location of the site (city centre, other urban area, local service centre).

Use of Typical Urban Areas

- 2.10.3 Typical Urban Area (TUA) studies involve dividing the urban area into 'homogeneous character' case study areas. These are determined on the basis of land use, character, housing density and age. TUA residential types are based on a combination of the age of the area, dwelling type, and density with separate TUA's identified for commercial and industrial areas, town centres etc.
- 2.10.4 City of York Council has chosen to use this method for dividing up the local authority, especially the urban area for analytical purposes. This technique is well suited to identifying the scope for intensification, for understanding the likely level of windfalls that will arise over the plan period and for looking at appropriate densities for development.
- 2.10.5 For the Draft RSS a settlement study was carried out for the Yorkshire and Humber Region, which identified York as a Sub-regional centre. Several of the larger outlying villages¹¹ were also named Local Services Centres due to the facilities they had and the role they play as a settlement. We have used this study to delineate the Local Authority of York into 2 subsections, each of which are subdivided again in homogenous zones. The subsections derived from the RSS are as follows:
- York Urban Area (sub-regional centre)
 - Local Services Centres
- 2.10.6 In order to create the different character areas we have undertaken a desktop exercise to identify the areas and followed this by a survey to confirm the right locations of the boundaries. The sources used for the desktop exercise are:
- Historical map data relating to the sequential development of York;
 - York Central Historic Core – Conservation Area Appraisal (Draft Report, October 2005)
 - Conservation Areas taken from the Development Control Local Plan (April 2005);
 - Vector maps of York;
 - Aerial Photography;
 - Officer's knowledge of the City.

The identified zones and a brief explanation of each zone type are presented in Appendix 2 of this report.

¹¹ This included Copmanthorpe, Bishopthorpe, Nether/Upper Poppleton, Dunnington, Strensall/Towthorpe and Haxby/Wigginton.

- 2.10.7 For each of the typical urban area zones identified an analysis will be undertaken of the last ten years worth of housing windfall completions across the city. This includes all sites that have been granted planning permission for residential development from 1st April 1996 to 31st March 2006 that were not previously allocated.
- 2.10.8 This information will allow us to calculate an average housing density for each zone based on the last ten years and also a density range based on the average. This range will allow various yield options to be put forward for each potential site to allow greater flexibility in looking at future policy approaches to housing density.
- 2.10.9 The density analysis will also include different examples of densities achieved across the city in order to better assess what different housing densities actually look like on the ground.

2.11 Determining the likely level of windfall

- 2.11.1 Windfall sites are previously developed sites (brownfield) that have not been specifically identified as available in the plan process. They could include, for example, large sites such as might result from a factory closure or very small changes to the built environment, such as a residential subdivision or a new flat over a shop.
- 2.11.2 Although the contribution to housing supply from individual windfalls cannot be quantified in advance (by definition), it is reasonable to expect that windfalls in general will emerge over the course of the plan period.
- 2.11.3 PPS3 advises that local authorities should by drawing on information from the Strategic Housing Land Availability Assessment and or other relevant evidence; identify sufficient specific deliverable sites to deliver housing in the first five years. To be considered deliverable, sites should, at the point of adoption of the relevant Local Development Document (Allocations DPD) be available, be suitable and be achievable. Local Authorities should also identify a further supply of specific, developable sites for years 6-10 and, where possible, for years 11-15, broad locations for future growth should be indicated.
- 2.11.4 Once identified, the supply of land should be managed in a way that ensures that a continuous five year supply of deliverable sites is maintained i.e. at least enough sites to deliver the housing requirements over the next five years of the housing trajectory.
- 2.11.5 In determining how much land is required, PPS3 advises that local planning authorities should not include sites for which they have granted planning permission unless they can demonstrate, based upon robust evidence, that the sites are developable and are likely to contribute to housing delivery at the point envisaged. As part of this study information will be collated to illustrate what proportion of sites that have been granted planning permission for housing have come forward and been completed within a five year timescale. This will help to build up an evidence base of the likelihood of sites to come forward within a specific time frame.

- 2.11.6 The new PPS3 also advises that allowances for windfalls should not be included in the first ten years of supply unless robust evidence of genuine local circumstances that prevent specific sites being identified can be provided. In these circumstances, an allowance can be included but should be realistic having regard to the Housing Land Availability Assessment, historic windfall delivery rates and expected future trends. The guidance recognizes that in some cases local authorities will not be able to identify all sites in advance and so will therefore need to make a realistic allowance for windfall in their development plan documents.
- 2.11.7 The guidance on completing Strategic Housing Land Availability Assessments advises that allowances for windfalls should be made on the basis of examining past trends in windfalls coming forward for development and on the likely future implementation rate. What this means for Housing Land Availability Assessments is quite straightforward – if a site is identifiable and it is allocated in the site allocation development plan document, then it is not a windfall. But if the assessment shows potential for sites within a particular category to become available in the future, an informed estimate can then be made as to the rate at which these sites are likely to appear.
- 2.11.8 The City of York has experienced consistently high, and often unanticipated, levels of windfalls (residential subdivisions through to the redevelopment of large commercial sites) over the past ten years. The actual number of windfall completions over the last ten years has been a lot higher than that accounted for in the Local Plan. Therefore as part of this Housing Land Availability Assessment we are proposing to carry out a detailed analysis of past windfall completions and to reassess the current methodology to take into account more recent trends.
- 2.11.9 In the current draft Development Control Local Plan (April 2005) an allowance for windfalls is made based on a ten year trend (1991-2001) projected forward with discount rates applied. Table 2.2 shows the current windfall categories used in the Draft Local Plan and the discount rates. The discount rates were previously agreed between City of York Council and the Home Builders Federation (HBF).

Table 2.2: City of York Housing Requirements 1998-2011 (extracted from table 7.1 of the City of York Development Control Local Plan, April 2005)

Windfall Type	Number of Dwellings based on 10 year trend projected forward over ten years (2001-2011)	Number of Dwellings with discounts applied
Small windfall sites (less than 0.4 ha)	230	207 (10% discount)
Larger windfall sites (0.4-1ha)	420	294 (with 30% discount)
Large sites (over 1ha)	1350	675 (with 50% discount)
Allowance for conversions	280	252 (with 10% discount)

- 2.11.10 For this Housing Land Availability Assessment an analysis of the past ten years of housing windfall completions data will be completed (1996-2006). This will include providing 10-year trend data for each of the proposed windfall categories (see table 2.2), for each of the typical urban areas (please

refer to section 2.10 for details). This will allow us to assess how many windfalls have come forward in different areas of the city and of what size and will give a more robust evidence base with which to make future assumptions about the likely rate of future windfalls.

Table 2.3: Proposed new windfall categories for the Housing Land Availability Assessment

Windfall Type	Size Threshold
Very Small Windfall	Sites under 0.2ha
Small Windfall	Sites between 0.2 and 0.4ha
Medium Windfalls	Sites between 0.4 and 1ha
Large Windfalls	Sites over 1ha
Conversions	N/A
Change of Use	N/A

- 2.11.11 We are proposing in this study to make the windfall categories more detailed to allow us to reflect the difference in rates of completion for each of the different types of windfalls. We are proposing to include a new category of very small windfalls for sites under 0.2ha, as these will not be picked up by the assessment of sites (which only looks at sites over 0.2ha). A preliminary analysis of the past ten years of completions data suggests that there have been a significant number of completions under this size threshold and therefore some allowance will need to be made.
- 2.11.12 Following the advice given in PPS3 we are proposing to only include an allowance for very small windfalls (under 0.2ha), in the first five years of supply, along with an allowance for conversions and changes of use. This is to reflect the fact that this size of site will not be picked up during the assessment and also the historical trend evidence, which shows that a significant number of these sites have come forward in the past ten years and that this is likely to continue.
- 2.11.13 The housing supply for years 1 to 5 will therefore consist of allocations (a realistic assessment of how many dwellings will be achieved in years 1-5); an allowance for existing planning permissions in the system at the time; an allowance for conversions (based on 10 year trend); an allowance for changes of use (based on 10 year trend) and an allowance for very small windfalls (based on ten year trend).
- 2.11.14 The relatively high level of small site completion reflects that a large amount of development comes from infill and intensification of existing built area. It is likely that the recent higher completion levels are due to the effects of PPG3 encouraging developers to source sites from within urban areas, and the result of such a concentration has unearthed many small sites. The development of small sites at a high rate may continue for the foreseeable future, but it is not an infinite resource and environmental capacity constraints such as wanting to build at lower densities in the city centre and urban area in order to protect the historic core of York may mean more opposition to this type of high density development on very small sites. For this study it is proposed to use an average of the last ten years for very small sites, conversions and changes of use. However, this projected average yield will need to be closely monitored to check its validity and trend in future completions.

- 2.11.15 As an element of double counting may occur between the very small sites included within the existing planning permissions and the allowance made for very small windfalls it is proposed that further analysis will be carried out as part of this study. If this analysis shows that a significant proportion of the very small windfall allowance will be already counted for in the existing planning permissions then a higher discount will be applied to take account of the potential for double counting.
- 2.11.16 We are proposing at this stage to include a non-implementation allowance of 5% to each category to make an allowance for planning permissions for housing that are not implemented and for allocations that might not materialize into completions in the plan period. Whilst there is no generally agreed method for arriving at a non-implementation allowance figure it is considered that it should be low.
- 2.11.17 One reason for this is that the purpose of Housing Land Availability Assessments and a main aim of PPS3 is to maximize the use and yield of urban land for the provision of housing, partly in order to minimize the release of undeveloped land beyond the defined urban boundaries. Plan, Monitor and Manage is an essential component of PPS3 and a necessary ingredient of any Plan. It would be perverse to allocate sites only to artificially reduce their yield when national guidance encourages their maximization. In addition, there will be sources of housing that come forward in the plan period that could not have been foreseen, which will have the effect of countering any allocations which are not implemented.
- 2.11.18 The Housing Land Availability Assessment will be conducted on the basis that sites will only be identified where there is confidence in the site yielding residential units in the timeframe of the plan, recognizing that others which cannot be identified at the present time and counted as numerical yield in the assessment may come forward. The City of York authority area has a strong housing market, and house builders are actively pursuing land acquisition opportunities. It is likely that the majority of sites identified as sources in the assessment will be attractive to the house building industry despite some physical constraints such as ownership and access. The results of the Housing Market Assessment which will feed into this study will give more information of the current housing market in York and the demands for particular types of housing.
- 2.11.19 In City of York data is also collected on the completions on small sites and medium sites. These sites are defined as those on sites between 0.2 to 0.4ha and 0.4 to 1ha respectively. Again as with small sites there is a great deal of fluctuation in the completion data. Therefore an average over the past ten years may be the most appropriate approach to take in including the likely windfall from these sites based on past trends.
- 2.11.20 The identification of this type of site due to the larger site size will be easier for the Housing Land Availability Assessment to identify during survey. Therefore in order to avoid double-counting of sites, it is proposed to apply the trend based averages for small and medium sites only after the first five years. It is proposed that a trend based allowance should be included for small sites and medium sites in year 6 onwards with a 10% discount applied to account for a degree of uncertainty surrounding sites coming forward for development and to reduce the risk of double counting as some of these sites

will be identified through the assessment. This approach also follows guidance given in PPS3 that advises that local authorities should not include an allowance for windfalls in years one to five.

2.11.21 As far as large sites are concerned (sites over 1ha), the identified study sites are intended to replace what was previously regarded as large site windfalls. The development process will continually bring forward sites not able to be considered now because they are in alternative uses, such as car parks, and sites currently in employment use. These potential sources will have the ability to add to housing potential in the City of York area and the assessment will need to consider whether to make an adjustment to the yield for large sites. However, in making an additional allowance for large windfalls there is the risk of double counting. It is likely that many of the sites that would have been large windfalls will be identified as opportunity sites in the assessment. The aim of the assessment is to identify these sites rather than to include them as a large site windfall allowance. However, if no allowance is made then it is likely that this source of housing potential will be under estimated in future years.

2.11.22 At this stage we are proposing to only include an allowance for large windfalls from year 6 onwards and to discount by 50% to take account of the fact that the majority of these sites should have been identified as part of the assessment. It is recommended that the completion rate on these sites is carefully monitored, and that if there is any firmly quantifiable evidence showing completions coming forward on large sites then adjustment can be made to the figures.

2.11.23 The strategic Housing Land Availability Assessment will need to be carried out on a regular basis, at least every five years, so that adjustments can be made based on newly identified sites and more recent trends in housing completions. These completion rates will continue to be carefully monitored and Plans need to be flexible enough to respond to these circumstances.

2.12 Implications for the Local Development Framework and Monitoring

2.12.1 We are currently in the process of completing a new Local Development Framework (LDF) for York. This early stage of the Plan review process is therefore a highly opportune time at which to complete the Strategic Housing Land Availability Assessment. PPS3 advises that such studies, along with a Housing Market Assessment, should be undertaken to provide the necessary evidence base to support the Development Plan Documents (DPD), in particular the Allocations DPD.

2.12.3 Development plans are now expected to be more dynamic in their provision of housing, replacing the setting of long term targets with the continuous management of the provision according to the objectives set out in the plan and informed by frequent monitoring of the provision taking place. The LDF will need to demonstrate how it meets the 'plan, monitor and manage' approach.

- 2.12.4 The information that we decide to monitor in the future will be determined by the requirements of the way that housing provision is to be made and managed. If phasing policies are to be included in the plan, the implementation of these will require that detailed information be collected on the take-up of the categories of provision identified in the policies. Data will continue to be collected on permissions and completions in order to be as well informed as possible about the way in which different areas and different possible sources are performing in terms of new housing being created. We will continue to maintain records on the 'take-up' of sites, including the new sites identified in the assessment, using our housing monitoring system and GIS. This will be completed on an annual basis so that a close track can be maintained on the assumptions underlying both the assessment and the allocations arising from it.
- 2.12.5 Monitoring of housing land supply and implementation of policy is an essential process. Its purpose is to ensure that housing requirements are being met in line with the sequential approach, and if not, what action needs to be put in place to rectify the situation. It is also essential to analyse past permissions and resultant completions, without which it is impossible to predict with any confidence the level of future 'windfall' development rates.
- 2.12.6 In the context of the assessment, monitoring will enable the tracking of the development time period for each site. Each study site will need to be monitored for the submission of applications, rather than just awaiting a permission. In this way we will be in a better position to predict what is coming through the system, and how close it is to the predicted position. We will need to develop regular contact with the development industry to help inform effective monitoring. This will enable a better understanding of variable development rates on large allocations and how these can affect a continuous supply.
- 2.12.7 Where it is evident that completions are not coming forward at a sufficient rate to meet requirements, it will be necessary to address the reasons for this, and if appropriate, adjust the Plan's approach, including the phasing of sites. For instance, if sites allocated in phase 1 have not come forward as anticipated it may be necessary to immediately bring forward an alternative site from phase 2, and similarly towards the end of phase 2 going into phase 3, because of the long lead in time for infrastructure and associated development covered by legal agreement.
- 2.12.8 The monitoring process will also enable the tracking of new sites, which would have been included in the HLAA if they had been available at the survey time. Any large site or a combination of a number of sites coming forward could be sufficient to require a review of the plan, or revisions made to the phasing of sites.

2.13 Responding to this consultation

In order for your comments to be registered you must include:

- your name
- your contact address
- your comments.

Where possible, please refer to paragraph numbers. Please also provide a justification and evidence to support your comments where possible.

Please note that the closing date for this consultation is 9th March 2007.

Any comments on the study methodology or enquiries should be addressed to:

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This report can also be viewed on the City of York Council website at:
www.york.gov.uk/environment/planning/local_development_framework/ldf_evidence_base/hlaa

ANNEX 1: LIST OF CONSULTEES

Statutory Consultees

Government Office for Yorkshire and Humber
North Yorkshire County Council
Natural England – NE Yorkshire Team
Environment Agency
Highways Agency
English Heritage
Home Builders Federation
York Property Forum
York Environment Forum
CABE
York Civic Trust
Conservation Area Advisory Panel
Housing Corporation
CPRE
Home Housing Association
York Housing Corporation
Joseph Rowntree Housing Trust
Yorkshire Housing
Tees Valley Housing Group

Internal Consultees

Housing
Property Services
Design, Conservation and Sustainable Development
Development Control
Transport Planning Unit
Community Services
Economic Development Unit
Inward Investment Board
Archeology
Environmental Protection Unit

ANNEX 2: CHARACTER ZONES IN THE HOUSING LAND AVAILABILITY ASSESSMENT:HOW WE HAVE IDENTIFIED THE DIFFERENT ZONES

City Centre Character Areas.

The centre of York has been characterised according to the York Historic Core: Draft Conservation Area Appraisal (October 2005).

The area within York's ancient walls was designated as a conservation area in 1968 and extended in 1975 to include the bar walls themselves and the approaches and surroundings which contain Georgian, Regency and Victorian buildings.

The purpose of the Conservation Area Appraisal is to describe, define and analyse the special character and appearance of the conservation area and its immediate surrounds as well as assess the area's current condition.

For the Housing Land Availability Assessment we have used the area names and boundaries as defined in the Conservation Area Appraisal as they each distinguish a different character in the City Centre.

Urban Area Character Areas

In order to create the different character areas for the rest of the urban areas we have undertaken a desktop exercise to identify the areas and followed this by a survey to confirm the right locations of the boundaries. The sources used for the desktop exercise are:

- Historical map data relating to the sequential development of York;
- Conservation Areas taken from the Development Control Local Plan (April 2005);
- Vector maps of York;
- Aerial Photography;
- Existing land use e.g. Educational establishments
- Officers knowledge of the City.

The 13 zones are characterised as below:

Zone 1: City Centre

See City Centre Character Areas as above

Zone 2: Terraced Housing

The main character of terraced housing is streets of adjacent properties, through terraces or forecourted terraced properties, that have small front gardens and back yards. The potential in these areas for further housing development is limited due to the characteristics of the properties and therefore is represented in a separate zone.

Zone 3: Conservation Areas

York has 33 conservation areas in total (as outlined in Appendix B in the Draft Local Plan (April 2005)), which are located in the main urban area and the villages surrounding York. Due to a rich variety of townscapes which they cover, the conservations areas have been categorised separately due to their individual

character as we recognise that they will have different development potential to other parts of the city.

Zone 4: Development pre 1960

Based upon historical data of the sequential development of the city and existing vector maps, areas have been identified that were typically built up until approximately the 1960s. This has been determined through road layout and via the type of housing surveyed when the boundaries for each zone were checked. Officer knowledge has also played a key part in identifying this zone.

Zone 5: Development between 1960s and 1980s

Based upon historical data of the sequential development of the city and existing maps, areas have been identified that were typically built up between the 1960s and 1980s. This has been determined through road layout / design and via the type of housing surveyed when the boundaries for each zone were checked. Officer knowledge has also played a key part in identifying this zone.

Zone 6: City Centre Extension area

This zone has been proposed due to the nature of development that has occurred on the eastern side of the City Centre along Lawrence Street and Heworth Green. The development tends to be high density, flatted development in this area, which is in keeping with the higher density ratios that are experienced in City Centre sites.

Zone 7: Post 1980s Development

Based upon historical data of the sequential development of the city and existing vector, areas have been identified that were typically built up between post 1980. This has been determined through road layout / design and via the type of housing surveyed when the boundaries for each zone were checked. Officer knowledge has also played a key part in identifying this zone.

Zone 8: Employment Areas

The employment areas are existing employment sites / industrial estates / business parks located around the city. It is an important category to note as some employment sites are developed for housing if they are no longer required for employment use.

Zone 9: Educational Establishments

This category includes all primary and secondary schools in the York area.

Zone 10: University of York

The University of York is a major educational establishment within the city. It is categorised separately as it is envisaged that this land will not come forward for development.

Zone 11: MOD Land

The MOD have barracks located along Fulford road and in Strensall. The Fulford road site is a housing allocation in the Draft Local Plan (April 2005). Due to the specific current use of this land the MOD land has a separate category.

Zone 12: Recreation and Leisure use

Some land in York is exclusively for recreation and leisure use, e.g parks. Where these uses are located within the urban area we have included them within this category.

Zone 13: Hospitals

This zone characterises the Hospitals in York as one category.

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