



Annex A:

Strategic Housing Land Availability
Assessment Consultation Draft

February 2009

Strategic Housing Land Availability Assessment: City of York

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Note:

The inclusion of sites within this study should not be taken to imply that the Council would consider planning applications favourably. Although it will inform housing allocations, it will not determine the allocation of land for housing development. It will also not prevent sites being brought forward or allocated for purposes other than residential development. All future planning applications will be considered individually and will be assessed through policies in the most up to date development plan.

INTRODUCTION

PPS3¹ sets out the requirement for Local Authorities to demonstrate a 5-year deliverable and 6-15 year developable supply of housing.

- 1.1 Local Authorities are required to demonstrate that they have a sufficient supply of potential sites suitable for residential development to meet the annual housing requirements set out in Regional Spatial Strategies. It notes how a robust shared evidence base of land availability through a Strategic Housing Land Availability Assessment (SHLAA) should inform Local Development Document and Regional Spatial Strategy policies and highlights the SHLAA as the main mechanism through which to identify a deliverable and developable supply of sites.
- 1.2 The key function of Strategic Housing Land Availability Assessments is to:
 - Identify sites with potential for housing;
 - Assess their housing potential; and
 - Assess when they are likely to be developed.²
- 1.3 The purpose of the SHLAA is to identify sites with housing potential, make an assessment of how many dwellings could come forward and when. This enables a calculation to be made of any shortfall in supply required to meet housing targets so that measures can be taken to allocate additional land. The SHLAA goes further than the previous Urban Capacity Studies in that it considers potential extensions to the urban areas and development in rural settlements – in settlements that are not necessarily considered suitable under current development plan policy.
- 1.4 This is one of a number of reports that will provide baseline evidence to be used by the Council in the preparation of the documents that form the Local Development Framework (LDF). The assessment itself does not represent a statement of Council policy; it is for the Core Strategy and Allocations DPD's to decide which sites are deliverable and should come

¹ Planning Policy Statement 3: Housing (Communities and Local Government, 2006)

² Paragraph 6, Strategic Housing Land Availability Assessments: Practice Guidance (Communities and Local Government, 2007)

forward for residential development and in what timescale. The inclusion of sites in the SHLAA should not be taken to imply that they will be allocated for development, or that the Council will consider planning applications favourably.

- 1.5 The role of the SHLAA is only as a pool of *potential* housing sites against which other policy considerations will need to be balanced. The SHLAA is to be used to support decision-making and does not pre-judge the strategic approach that the Core Strategy will take.
- 1.6 The following report outlines the planning context, details the chosen methodology and demonstrates the Council's potential housing supply.

OBJECTIVES

- 1.7 The main aim of the SHLAA is to demonstrate a deliverable and developable supply of land for housing. This will demonstrate whether the Council is in a position to meet the RSS target of 850 dwellings per year and will form a key part of the evidence base for the Local Development Framework (LDF). The key objectives of the SHLAA are to:

- Assess land availability by identifying buildings or areas of land (including previously developed land and Greenfield) that have development potential for housing;
- Assess the potential level of housing that can be provided on identified land;
- Identify constraints that might make a particular site unavailable and/or unviable for development;
- Assess which sites are likely to be deliverable and which are likely to be developable.³

- 1.8 Strategic Housing Land Availability Assessments provide a robust methodology by which all potential housing sites within a defined area of search can be identified. Sites are then assessed on the basis of when and whether they are likely to be developed, meaning that, in principle, a continuous five-year supply of housing and a forward trajectory of housing supply can be identified, as required by PPS3. A robust SHLAA is therefore a critical part of the evidence base necessary to support the production and adoption of Development Plan Documents.
- 1.9 The results from this SHLAA will be used to inform the LDF allocation process, although the identification of sites in this report will not determine allocations for housing development.

³ Annex 3, Planning Policy Statement 3: Housing (Communities and Local Government, 2006).

POLICY FRAMEWORK

NATIONAL POLICY

- 1.10 Planning Policy Statement 3 highlights the Government's objective for everybody to have access to a decent home. It notes how there is a need to provide a greater choice in housing to ensure that the needs of all in the community are met. In order to achieve these aims the Government has emphasised the importance of a "flexible, responsive supply of land which is managed in a way that makes efficient and effective use of land, including the re-use of previously-developed land, where appropriate"⁴
- 1.11 The Strategic Housing Land Availability Assessments Practice Guidance⁵ (referred to as the Guidance for the remainder of the report) details the requirements of Local Authorities to:
- Identify specific, deliverable sites for the first five years of a plan that are ready for development;
 - Identify specific, developable sites for years 6-10 and ideally 11-15;
 - Where it is not possible to identify specific sites for years 11-15 of the plan, indicate broad locations for future growth; and
 - Not include an allowance for windfalls in the first 10 years of the plan unless there are justifiable local circumstances that prevent specific sites being identified.⁶
- 1.12 According to PPS3 and the SHLAA Guidance each local authority should demonstrate a deliverable five-year supply. To be considered **deliverable**, sites should, at the point of adoption of the relevant Local Development Document be:
- **Available** – the site is available now;
 - **Suitable** – the site offers a suitable location for housing development now and;
 - **Achievable** – there is a reasonable prospect that housing will be delivered on the site within five years from the date of adoption of the plan.
- 1.13 To be considered **developable**, a site should be in a suitable location for housing development and there should be a reasonable prospect that it will be available for and could be developed at a specific point in time, but may not be achievable within the next five years.

⁴ Paragraph 10, Planning Policy Statement 3: Housing (Communities and Local Government, 2006).

⁵ Strategic Housing Land Availability Assessments: Practice Guidance (Communities and Local Government, 2007).

⁶ Paragraph 5 Strategic Housing Land Availability Assessments: Practice Guidance (Communities and Local Government, 2007).

- 1.14 A site will be considered not currently developable where it is unknown when the site could be developed because constraints are so severe it is not known when they may be overcome⁷.

REGIONAL POLICY

- 1.15 The Regional Spatial Strategy (RSS) 2008 sets out the required levels of growth in terms of future housing provision for York. It indicates that:
- Over the period 2004-08, 640 new homes should be built each year; and
 - Over the period 2008-2026, 850 new homes should be built each year.
- 1.16 Beyond the end date of the current RSS (2026), an annual rate of 850 homes per year has been projected forward until the end date of the plan (2030). This is to ensure that it can be guaranteed the City can meet its housing need without encroaching on proposed Green Belt Land. The Yorkshire and Humber Assembly are currently working on an update of the Housing topic in the Regional Spatial Strategy. As a result of the early feedback from the Spatial Options consultation the assembly have decided to do some further work on housing delivery in the form of a short enquiry which will consider written evidence and further oral evidence from some participants.
- 1.17 The Yorkshire and Humber Plan⁸ sets out the need for local authorities to use the results of up to date Strategic Housing Land Availability Assessments to inform the allocation of and development control decisions upon specific sites.

LOCAL CONTEXT

- 1.18 It is crucial that the SHLAA is approached as a technical exercise, which forms one component of the overall evidence base. The SHLAA should be seen as a document, which identifies potential supply and *does not* seek to make policy decisions on which sites should be developed, nor should it begin to formulate development plan policy in its own right.
- 1.19 The SHLAA's role is within the wider evidence base and it should be used in conjunction and alongside other evidence, for example, the Employment Land Review, Strategic Flood Risk Assessment and Strategic Housing Market Assessment. The SHLAA's role is as a pool of *potential* housing sites against which other policy considerations will need to be balanced. It should be made clear that the SHLAA is to be used to support decision-making and does not pre-judge the strategic approach that the Development Plan will take.

⁷ Paragraph 33 and 34, Strategic Housing Land Availability Assessments: Practice Guidance (CLG, 2007)

⁸ The Yorkshire and Humber Plan: Regional Spatial Strategy to 2026, Government Office for Yorkshire and the Humber, May 2008.

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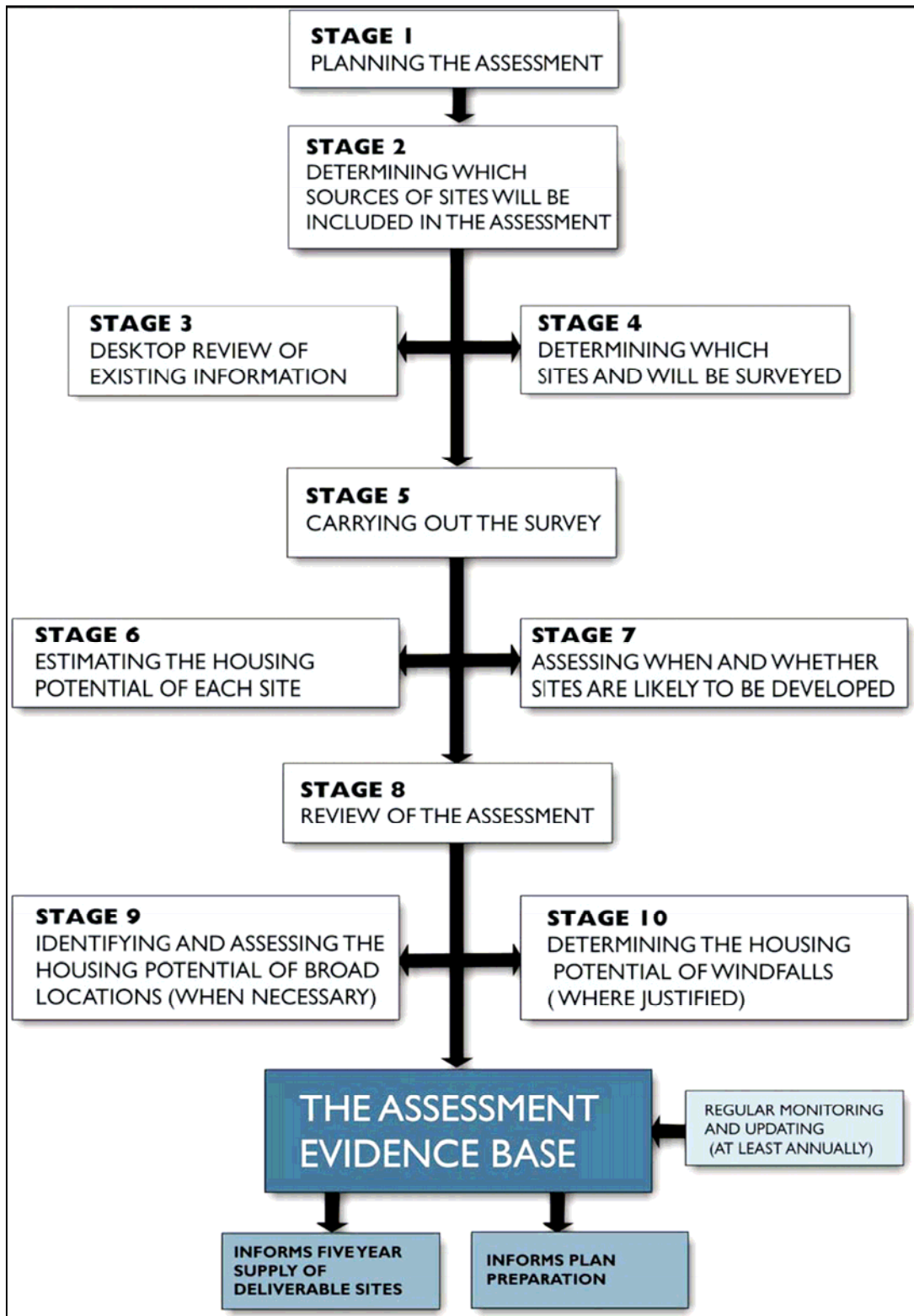
- 1.20 The SHLAA does not make a judgement as to what the policy approach in the Core Strategy should be but provides evidence on the availability of land in York for housing. The Core Strategy will need to consider whether a change in policy approach, from current Local Plan policies, will have to take place in order to deliver York's housing target.



METHODOLOGY

2.1 Figure 1 outlines the key stages involved in a SHLAA. This process is detailed in the SHLAA Guidance and constitutes the methodology used in the production of this SHLAA.

Figure 1: Key Stages of the SHLAA



- 2.2 Figure 2 simplifies the basic elements of the SHLAA; i.e. a database of sites and associated information against which an assessment is run

Figure 2: The Strategic Housing Land Availability Assessment



- 2.3 A useful way to understand how the SHLAA fits into the overall housing supply picture is to illustrate the housing supply as a 'Conveyor Belt' as set out in figure 3.
- 2.4 This helps to provide an understanding of why it is unnecessary to consider windfalls and very small sites as part of the SHLAA process. As set out later in this report, doing so is likely to result in the basis of the SHLAA being challenged.

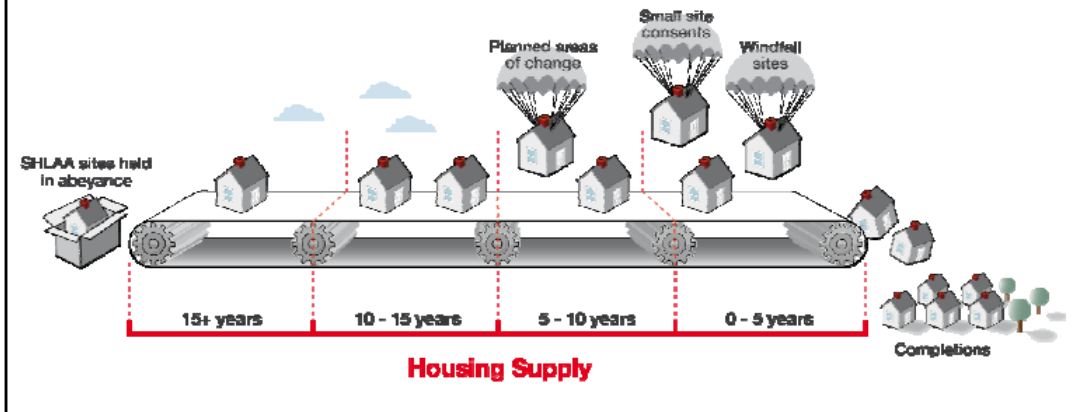
Figure 3: Housing Supply as a Conveyor Belt

The Strategic Housing Land Availability Assessment is an important part of identifying the continuous 5-year supply of housing and land-supply beyond that. A useful way of conceptualising this is to see housing supply as a conveyor belt.

The conveyor belt produces housing supply (in the form of completions). At the very front of the conveyor are the housing sites under construction. Beyond those, and next in line, are those sites with planning consent which are considered likely to be delivered within the 5-year supply timeframe. This will include windfall sites and small sites, which have not been planned for as part of the supply, but are nonetheless forming part of the supply. In effect, they have 'dropped-in' to the supply identified in the Strategic Housing Land Availability Assessment, pushing everything else back.

Beyond this is the current phase of allocated housing land. Beyond that are later phases, or sites with planning consent which are likely to be delivered in the medium term. And so the picture builds with later phases of allocated housing land and then unallocated sites identified in the Strategic Housing Land Availability Assessment forming the start of the conveyor. Planned areas of change and regeneration are likely to appear on the conveyor as part of the medium-term supply, where these are being pro-actively planned for.

This principle is useful in demonstrating how windfalls and small sites are still considered as part of the supply, but which 'fall-in' near the end of the conveyor, effectively 'pushing-back' the rest of the supply.



STAGE 1: PLANNING THE ASSESSMENT

ESTABLISHING A PARTNERSHIP

- 3.1 The Guidance advocates the use of sub-regional housing market areas as the level of aggregation for the SHLAA. After consideration of the considerable regional and local research into sub-regional housing market areas it was decided that the York SHLAA should use the City of York administrative boundary as its housing market area as used in the York Strategic Housing Market Assessment. This also accords with the findings of the DTZ study⁹ commissioned by Yorkshire and Humber Assembly to inform the Regional Spatial Strategy for Yorkshire and the Humber which concluded that York provides a satisfactory focus on which to base a sub area. The methodology of this assessment has followed the practice guidance and will therefore be capable of aggregation to a wider housing market area level if required at a later date. Further details of the DTZ report are included in the City of York Strategic Housing Land Availability Assessment Phase 1 Report¹⁰.

STAKEHOLDER CONSULTATION

- 3.2 The Guidance advocates that local authorities should involve key stakeholders including house builders, social landlords, local property agents and local communities during the survey and assessment stages to provide useful and pragmatic advice. The methodology for undertaking the SHLAA was sent out to numerous stakeholders in April 2007 including the House Builders Federation, English Heritage and Natural England and placed on the Council's website. Following the consultation amendments were made to the methodology. Phase 1 of the City of York SHLAA was taken to the Local Development Framework Working Group in December 2007 and following further amendments was published in April 2008.
- 3.3 The Phase 1 SHLAA was based on an initial assessment of sites within the urban area and larger villages and an initial estimate of future potential capacity was made based on an initial assessment of constraints and a density assessment. Phase 1 of the SHLAA only covered stages 1 to 6 of the methodology (Figure 1) and did not include an assessment of the suitability, availability and achievability of sites identified.

⁹ Yorkshire and Humber Assembly Report: Identifying the Sub-Regional Housing Markets of Yorkshire and Humber

¹⁰ City of York Strategic Housing Land Availability Assessment Phase 1, City of York Council, April 2008
http://www.york.gov.uk/environment/Planning/Local_development_framework/LDF_Evidence_base/HLAA/

- 3.4 This second phase of the SHLAA started with a 'Call for Sites' as part of the Issues and Options consultation process for the Allocations DPD. This process invited members of the public, developers, land agents e.t.c to suggest sites to the Council for possible future development (this included sites for all land use types, not just housing). The sites put forward as part of this process for housing or for mixed-use development have now been added to the sites identified in the Phase 1 assessment. These sites have now been collated on one SHLAA database and this report details the results of the assessment following all the stages of the methodology outlined in figure 1.
- 3.5 As part of the assessment of suitability, availability and achievability further consultation has taken place with all those people who submitted sites as part of the Call for Sites and in addition other key stakeholders identified from the LDF consultation database. A full list of consultees is included in Appendix 1 to the main report. A letter and questionnaire was sent to each stakeholder asking whether they would like to take part in further consultation on the SHLAA to give their views on the draft SHLAA report and for all those people who submitted sites views were sought on site suitability and possible constraints to development, site ownership and availability and likely timescales for the site to become available. A copy of the letter and questionnaire sent to stakeholders is included in Appendix 1 to the main report. Completed questionnaires were received for 65% of the sites.
- 3.6 The SHLAA was carried out internally as it was felt that sufficient expertise existed within the Council to assess potential housing sites through existing databases and local knowledge. The results of the draft SHLAA have also utilised the expertise and knowledge of the stakeholders that have responded to the invitation to submit sites. For example, house builders and landowners have been able to give their views on the availability and deliverability of the site/s put forward.
- 3.7 Further views are now being sought on this consultation draft report, which will be assessed and actioned prior to the publication of the final report. This further consultation exercise on the draft findings of the SHLAA will help to ensure that the SHLAA is of sufficient quality to form an essential part of the evidence base for the LDF, which can be built on annually.
- 3.8 The results of the SHLAA are held within an Access database connected to the Council's GIS (MapInfo). The intention is to continuously review the information within the SHLAA database as part of the housing monitoring system already in place and to formally update it on an annual basis, with a base date of 1st April through to 31st March. This annual review will determine if there have been any changes in the sites identified (e.g. if site has been granted planning permission or if a site has started development). The results will be included in the Annual Monitoring Report (AMR) for the LDF, which will include details on the housing trajectory taken from the SHLAA.

STAGE 2: DETERMINING SOURCES OF SUPPLY

- 4.1 In line with the CLG guidance, the findings of the York SHLAA includes an assessment of the following sources of sites that have potential for housing that are currently in the planning process. Please note that the following sources relate to the position at the 1st April 2008.

Sites with extant permissions at 31st March 2008

- 4.2 Sites with current planning permissions (either full or outline) for residential development (or mixed-use with a residential element) were included in the SHLAA if the site area was above the SHLAA site threshold of 0.2ha. This includes sites that are currently under construction in addition to sites that are not under construction.
- 4.3 All sites with permission under the threshold are included as consents but have not been considered individually as part of the SHLAA process.

Existing Local Plan Allocations

- 4.4 Policy H1 in the 2005 City of York Development Control Local Plan allocated a total of 30 sites for residential development. All sites that have since been completed have been omitted from the list of SHLAA sites and the sites with remaining capacity have been included.

Sites with existing Development Briefs or emerging Area Action Plans

- 4.5 Sites and/or areas that have existing development briefs or an emerging Area Action Plan that include or have the potential to include an element of residential development have been included within the assessment. Specifically these are York Northwest (Including the York Central and British Sugar site), Terry's factory, Nestle South and Castle Piccadilly.

Sites that are allocated (or have planning permission) for employment which are no longer required for that use

- 4.6 The findings of the Employment Land Review (ELR) has helped to identify sites that are potentially no longer suitable for employment use or may have longer –term redevelopment opportunities, which may involve an element of residential use. Sites which have been short listed in the ELR as being the most suitable sites for employment use have been included in the assessment if they were submitted as part of the Call for Sites exercise but the findings of the ELR have been used to make a judgement on the sites suitability for housing development.

- 4.7 In addition, the results of the SHLAA include an assessment of other sites that are not within the planning system but where they may be potential for residential development. These include:

National Land Use Database

- 4.8 The National Land Use Database (NLUD) identifies and monitors previously developed land and buildings in England that may be available for development, whether derelict, vacant or still in active use¹¹. The NLUD is updated by Local Authorities on an annual basis, and sites identified as being suitable for residential development in the 2007 update were included in the SHLAA. City of York completed the NLUD update in December 2007.

“Call for sites” Exercise

- 4.9 The Council undertook a ‘Call for Sites’ exercise through which members of the public and key stakeholders were invited to submit sites with the potential for development. This process was carried out as part of the public consultation on the Issues and Options for the Allocations DPD. A press release was issued and the exercise was advertised on the Council’s website in accordance with the consultation process outlined in the Council’s Statement of Community Involvement¹². Consultation on the Allocations DPD Issues and Options Report including the Call for Sites exercise took place between March and May 2008 and a total of 226 sites were mapped and assessed as part of the SHLAA. This included all sites put forward as suitable for residential development or for mixed-use development with an element of residential.

¹¹ www.nlud.org.uk

¹²

http://www.york.gov.uk/content/45053/64877/64880/Local_development_framework/Statement_of_community/AdoptedSCI.pdf

STAGE 3: DESKTOP REVIEW OF EXISTING INFORMATION

- 5.1 The process and method used in the production of the SHLAA was drawn from the SHLAA guidance and was supplemented with the advice contained in PPS3, the Yorkshire and Humber Assembly Regional Practice Guide¹³ and the Planning and Advisory Service (PAS) guidance on Strategic Housing Land Availability and Development Plan Document Preparation¹⁴.
- 5.2 The Council already has access to a considerable amount of information relating to potential housing sites within the York area. This includes a range of databases and GIS datasets that contain important information that has helped to assess the deliverability and developability of sites, including site constraints. The following sources of information were used as part of the desktop review of existing information:

Figure 4: Sources of Information

Sites in the Planning process	Purpose
Site allocations not yet the subject of planning permission	To identify sites
Planning permissions/sites under construction	To identify sites
Site specific development briefs	To identify sites and any constraints to development
Planning application refusals	To identify sites – particularly those applications rejected on grounds of prematurity but also viability, deliverability or known constraints to development
Dwelling starts and completion records	To identify the current development progress on sites with planning permission
Other sources of information used to identify sites	
City of York Council Urban Capacity Study	To identify buildings and land, and any constraints to delivery
Empty Property Register	There are generally low levels of void within York. Analysis of the Empty Homes Register did not identify any pockets where voids were a particular problem or identify any potential for clearance programmes/redevelopment opportunities. This will be reviewed on an annual basis in the updates of the SHLAA.
National Land Use Database	Much of the information that is contained within the NLUD database derives from other datasets that the Council holds, including the Housing Monitoring Database and Employment Land Availability Assessments for example.
Register of Surplus Public Sector Land	To identify buildings and land
Draft Employment Land Review 2008	This work was undertaken within the same timeframe

¹³ Understanding Yorkshire and Humber's Strategic Housing Land Availability: Regional Practice Guide, April 2008

¹⁴ Strategic Housing Land Availability Assessment and DPD Preparation. Planning Advisory Service, January 2008.

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	as the SHLAA by consultants ENTEC and is an assessment of all employment sites within the York area. The findings of the ELR have helped to identify potential surplus employment land that could have the potential to accommodate residential development. It should be noted however that planning applications for residential use on employment sites would still need to be assessed against planning policy that seeks to protect existing employment land.
Desk-based site identification – maps 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 have been surveyed	To identify land
Sites identified by City of York Council Officers (Community Services, Property Services)	The Planning Team have worked closely with other Council services, including Property Services to help identify potential sites within the SHLAA.
Alternative housing sites suggested at Local Plan Changes 3 (February 2003) and Changes 4 (April 2005)	All sites that were suggested at either Changes 3 or 4 to the City of York Local Plan have been included in the assessment. This includes the sites proposed for reserved land (2011-2021) in consultation on the proposed Third Set of Changes to the Local Plan in 2003 and the sites put forward for consultation in the Fourth Set of Changes to the Local Plan.
New brownfield sites coming forward e.g. Terry's, York Northwest and Nestle South;	To identify buildings and land, and any constraints to delivery
Sites suggested at the 2006 housing inquiries for Metcalfe Lane and Germany Beck	To identify buildings and land

STAGE 4: DETERMINING WHICH SITES AND AREAS TO SURVEY

- 6.1 The SHLAA guidance recommends that the SHLAA should identify all settlements where housing could be provided, not just the main urban areas. The Council has surveyed all sites identified through the SHLAA to help determine the sites that have the potential for future housing and to identify possible constraints to development.
- 6.2 The Council has included all sites put forward for residential development through the 'Call for Sites' in the assessment in addition to those identified through other sources highlighted in figure 4. As determined in SHLAA Phase 1 a site threshold of 0.2ha has been used.
- 6.3 In total 226 sites were assessed as part of the SHLAA. As the assessment covers all sites identified within the City of York boundary it does include Greenfield sites, including some that are within the current draft York greenbelt. The SHLAA is intended to inform evidence in the long term and for this reason the guidance suggests that there would need to be a robust reason to exclude Green Belt sites from the assessment. The issues that including Green Belt sites might raise will be resolved through the policy-making process and the Green Belt Status of sites has been included in the assessment criteria as recommended in the Regional Practice Guidance.
- 6.4 The guidance states that '*sufficient sites outside existing settlement boundaries should be included to enable the authority to be as confident as possible that enough developable sites will be identified to meet the housing target, and to provide for the genuine consideration of alternatives, as part of the plan-making process*'.
- 6.5 Greenfield sites are included within the assessment to provide a rounded assessment of all potential sources of supply, with consistent information on deliverability and developability. Strategic choices are more complex than simply filling up urban areas and then looking outside. There is a need to allow for other types of land use, which will often be better, located within existing settlement limits. The best solution may involve bringing forward some greenfield land, e.g. to offer a better range of sites or secure more affordable housing. The objective of maximising brownfield development still continues but is stands alongside the objective of fully meeting housing requirements – both of which are very important. The ambition of sustainable development may also dictate that some brownfield sites are reserved for other uses.
- 6.6 The purpose of the SHLAA in relation to the Core Strategy is to provide evidence that sufficient housing land can be provided within the locations indicated by the strategy. Without such evidence it would be difficult to fully demonstrate the deliverability of the strategy. However, in light of the revised PPS12, if allocations DPD is to be prepared, it is not necessary to identify specific sites in the core strategy, but simply to demonstrate that there are sufficient potential sites with sufficient capacity, having

considered reasonable alternative strategies. The allocations DPD will then make the final selection and show in more detail how the allocated housing sites relate to each other, other land uses, infrastructure and transport.

- 6.7 The Spatial Strategy for York, which will be set by the Core Strategy, will underpin the distribution of future development. The SHLAA is a technical exercise, which forms one component of the evidence base. The SHLAA identifies potential supply and does not seek to make policy decisions on which sites should be developed, nor should it begin to formulate development plan policy in its own right. The inclusion of Greenfield and green belt sites within the overall assessment does not pre-judge the strategic approach that will be decided through the Core Strategy.

STAGE 5: CARRYING OUT THE SURVEY

- 7.1 It was agreed that a desktop survey would be carried out prior to site visits. Any information that could not be obtained through the information already held was collected through subsequent site visits. For all sites the following information was recorded on to the SHLAA database.

- Site size in hectares;
- The site boundary with a polygon digitised on Ordnance Survey Mastermap;
- The current site use(s);
- The surrounding land use(s);
- The character of the surrounding area;
- Physical characteristics e.g. access and significant features;

STAGE 6: ESTIMATING THE HOUSING POTENTIAL OF EACH SITE

- 8.1 The guidance states that the estimation of the housing potential of each identified site should be guided by the existing or emerging plan policy, particularly the approach to housing densities at the local level.
- 8.2 The approach to estimating the housing potential of sites assessed through the SHLAA has been based on the emerging approach of the York Core Strategy, which is evidenced, from key documents such as the City of York Strategic Housing Market Assessment (SHMA)¹⁵.
- 8.3 In relation to issues of housing mix and density PPS3 states that:
- Local authorities should have a stronger influence in promoting mixed communities, and ensure new housing development provides an appropriate mix, type and tenure;
 - Local authorities may wish to set out a range of densities across the plan area rather than one broad density range, although 30 dwellings per hectare (dph) net should be used as a national indicative minimum to guide policy development and decision-making until local density policies are in place.
- 8.4 In addition, RSS advises that York's housing policy should ensure the provision of homes for a mix of households that reflects the needs of the area, including homes for families with children, single persons, and older persons, to create sustainable communities. York is also required to make additional provision to meet the housing needs of Gypsies and Travellers.
- 8.5 The SHMA states that between 2003 and 2006 almost two thirds of the housing development in York was flatted, whereas nearly two thirds of demand is for houses and one in six households contains at least one person with a support need, whether a physical, mental or sensory disability, and these households are much more likely to currently live in unsuitable accommodation.
- 8.6 The Council monitors the number and type of houses approved and built in order to consider how an existing policy approach is working and to influence any new or amended approach to delivery.
- 8.7 Since 2004, 60.2% of completions relates to flats rather than houses¹⁶. Calculations based on unimplemented permissions indicate an indicative mix in the various locations within the authority area:

¹⁵ City of York Strategic Housing Market Assessment, City of York Council 2007

¹⁶ Based on Housing Monitoring Mix Calculations

- City Centre¹⁷ – 91% flats, 9% houses
- Rest of Main Urban Area – 37% flats, 63% houses
- Rural area – 10% flats, 90% houses

8.8 To deliver housing which helps to meet locally identified need, the SHMA suggests that around 60%¹⁸ of new residential development should be houses rather than flats. The LDF plan period runs from 2004, in line with RSS, therefore to consider what mix of housing we should aim to provide it is important to first consider the mix of housing which is already committed.

8.9 Between 2004-2008 some 3387 homes were built in York, and a further 4431 homes were granted planning consent. Figure 5 shows the split of this committed development between flats and houses. Taking into account what has already been allowed for as committed development, we must find suitable land to provide for some 13442 additional homes over the plan period, of which at least 9644 should be houses. This equates to approximately 70% of new housing development.

Figure 5: Committed Development in York 2004-2008

Housing Distribution	Houses	Flats	Houses and Flats
Target 2004-2030	12,756	8,504	21,260
Committed Development 2004-2008	3,112	4,706	7,818
Residual	9,644	3,798	13,442
Proportion of housing to flats of residual figures	70%	30%	100%

8.10 Committed development i.e. un-built development over which the council has no further control (e.g. sites with extant planning permissions, part implemented permissions), currently equates to 7818 units in the city. The mix of units in this figure reflects the historic imbalance toward building flats, with only 3112 (40%) being houses and 4706 (60%) flats. This is the result of an un-planned approach to housing mix.

8.11 Redressing this committed imbalance over the Core Strategy plan period (to 2030), would require that 70% of all new units are houses and 30% flats across the city. This would equate to 9,644 houses and 3,798 flats

8.12 Responses to the two Issues and Options consultations on the York Core Strategy have been analysed and used to inform the emerging Preferred Options, in addition to the LDF evidence base.

¹⁷ For the purposes of housing monitoring, the City Centre relates to Micklegate and Guildhall Wards

¹⁸ The 2007 SHMA states 64%, this figure has been rounded as timescales differ, therefore 60% over the longer period of the plan is considered appropriate for this assessment.

- 8.13 Delivering a policy, which helps provide the appropriate type and mix of housing to meet York's needs was one of the priority actions for the LDF coming from consultation. This includes addressing the issues of affordability, 'lifetime homes', social inclusion and homelessness, housing for older people and assisted living, family housing, on and off-site student housing and housing for Travellers, Gypsies and Show people.
- 8.14 While no one option was preferred outright, there was support for the intent to include a policy, which could influence the minimum densities in general, locations. Many felt that density levels should be something left to negotiation on a site by site basis, to be informed by conservation area appraisals, village design statements, development briefs or other character statements as they emerge.
- 8.15 Site specific mix and type targets will be established through the Allocations DPD and Area Action Plans, and through negotiations undertaken on a site by site basis, to ensure that proposals for housing development reflect local circumstances and the outcomes of the Housing Market Assessment (2007), and to restrain housing types where concentrations are unduly high.
- 8.16 The Core Strategy will support housing development at density levels, which, as a minimum, support national guidance, reduce overall demand for greenfield land, and help engender community cohesion by making more intensive use of land, which offers the best access to facilities and services.
- 8.17 Given the importance of delivering houses, as opposed to flats in the future, the Council must ensure that a reasonable density figure is set which allows for the delivery of houses in all areas of the city whilst still ensuring an efficient use of land.

Housing Market Areas

- 8.18 For the purposes of the SHLAA the City of York area has been split into zones which best reflect the characteristics of the areas, based on the assessment of housing market sub areas undertaken as part of the SHMA. Map 1 in Appendix 2 shows the zones used. The area has been split into:
- **City Centre** (based on the City Centre Inset from the City of York Local Plan and the City Centre Core Conservation Areas);
 - **City Centre Extension Zone** (including the York Central Site and the area around Foss Islands Road)
 - **Urban area** (A buffer of a mile from the city centre boundary as used in the SHMA);
 - **Suburban Area** (covering the suburban area of York within the ring road (A1237) but including Haxby and Wigginton as used in the SHMA); and

- **Rural Area** (the rest of the villages and rural area within the City of York UA boundary).

8.19 Figure 6 shows the housing potential section of the assessment proforma, which has been completed for each site assessed through the SHLAA.

Figure 6: Housing Potential Section of the Assessment Proforma

Estimated Housing Capacity					
Gross site area					
Net site area		Gross to net ratio: 0 - 0.4 ha = 100% 0.41 - 5 ha = 80% over 5 ha = 70%			
Estimated housing mix and type Criteria					
Location	Affordable housing ratio	Affordable housing threshold	Houses to flats ratio:	Housing type split	Type Applicable
City centre	50%	0.3 ha / 15 dwellings	70:30	100% townhouses	<input type="checkbox"/>
City centre extension	50%	0.3 ha / 15 dwellings	70:30	100% townhouses	<input type="checkbox"/>
Urban	50%	0.3 ha / 15 dwellings	70:30	85% townhouses/ 15% semi-detached	<input type="checkbox"/>
Suburban	50%	0.3 ha / 15 dwellings	70:30	66% townhouses / semi-detached 34% detached	<input type="checkbox"/>
Rural / Village	50%	0.03 ha / 2 dwellings	100:0	50% townhouses / semi detached 50% detached	<input type="checkbox"/>
Estimated total number of dwellings					
Housing Type and Mix:		Private dwellings	Affordable dwellings	Total	
No of houses	Total				
	Semi-detached / Townhouses				
	Detached				
No of Flats					

Calculating the Net Site Area

8.20 Firstly a calculation has been made to work out the net area of the site to which the calculation of housing yield should be applied. Following comments from Members on the SHLAA Phase 1 Report regarding the importance of provision of on-site facilities such as open space, transport infrastructure and community facilities the total gross site area in hectares has been 'netted off' to provide a net area to which the density calculation should be applied. This means that a proportion of land has been excluded

to allow for the provision of on-site facilities and so as not to over estimate housing potential.

- 8.21 The capacity of housing sites will be calculated by subtracting the area required for the provision of facilities and then applying an appropriate net density to the remaining site, based on site size and location. The larger the site the lower will be the gross to net ratio, while there will also be a decrease in density with distance from the city centre and facilities.
- 8.22 A net to gross ratio has been applied to the total gross site area in order to leave a suitable proportion of land on which to provide on-site facilities. Figure 7 shows the gross to net site ratio used.

Figure 7: Gross to Net Site Ratio

Gross Site Area (ha)	Gross to Net Ratio
0-0.4 ha	100%
0.41 – 4.99ha	80%
>5ha	70%

- 8.23 This means that for small infill sites 100% of the site area is used to calculate housing potential as these sites would tend to provide off site contributions and would be located in areas with existing provision of open space and other community facilities. For sites between 0.41 of a hectare to 5 hectares the calculation of housing potential has been applied to 80% of the total gross site area and assumes that 20% of the site area would be used for open space provision, transport infrastructure and community facilities. For sites over 5 hectares 30% of the total site area has been netted off for provision of facilities.
- 8.24 This calculation is based on examples of good design such as:
- **Derwenthorpe**, which has a total gross site area of 21.7ha and a net site area of 14ha. This equates to 65% of the total gross site area. The net site density is 38.5 dwellings per hectare. The site will provide open space, community facilities and extensive landscaping;
 - **Germany Beck, which** has a total gross site area of 32.5ha and a net site area of 16.9ha. This equates to 52% of the total gross site area. The overall net density will be 41 dwellings per hectare. The site will provide open space and community facilities including a local shop; and
 - **Tenneco, Manor Lane, which** has a total gross site area of 7.4ha and a net site area of 5.4ha. This equates to 72% of the total gross site area. The net density of the site is 51.5 dwellings per hectare. The site includes a health centre, open space and landscaping.

Estimating Site Density

- 8.25 Once the net site area has been established a density figure has been applied to the site depending on which zone the site falls within. To establish appropriate housing densities for each zone the Strategic Housing Market Assessment has been used and in addition the background work for the emerging Core Strategy.
- 8.26 In order to achieve the overall aim of providing 70% houses and 30% flats across the York area it has been necessary to calculate the density required in each zone for houses and flats which will result in an achievable 70/30 houses to flats ratio.
- 8.27 The density for houses has been based on the emerging Core Strategy and background work on design and appropriate density standards undertaken as part of SHLAA Phase 1. Figure 8 sets out the density standards used for houses in the SHLAA assessment.

Figure 8: Density standards for houses

Sub-Market	Density (dwellings per hectare)	Example
City Centre	75 dph	Bedern, behind Goodramgate
City Centre Extension Zone	75dph	Bedern, behind Goodramgate
Urban	50dph	White Cross Lodge, Haxby Road
Suburban	40 dph	Derwenthorpe, Germany Beck
Rural	30dph	Minimum PPS3 density standard

- 8.28 The density for flats has been based on an analysis of past trends in each of the zones. Figure 9 sets out the density standards for flats used in the SHLAA. Table 1 in Appendix 3 shows the full set of examples for each of the zones.

Figure 9: Density Standards for Flats

Sub-Market	Density (dwellings per hectare)	Example
City Centre	200 dph	Dixon's Yard 39 Walmgate
City Centre Extension Zone	120 dph	Lawrence Street Layerthorpe WMC
Urban	100 dph	Moss Street Depot DC Cooke, Lawrence Street
Suburban	80 dph	Southlands, Huntington Road 103 Boroughbridge Rd
Rural/Village	N/A (100% houses)	

8.29 To achieve an indicative housing mix of 70% houses and 30% flats on each site (except the rural zone – 100% houses) a composite density standard has been calculated which is based on 70% houses at the appropriate density standard shown in figure 8 and 30% flats at the appropriate density standard shown in figure 9.

8.30 By calculating out an assumed site of 100 units (70 units being houses and 30 units being flats) it is possible to calculate the amount of land that 100 units would require. For example in the City Centre zone we have calculated 70 units being houses at a density of 75 dwellings per hectare and 30 units being flats at 200 dwellings per hectare. This means that 100 units would require a land take of 1.08 hectares. By dividing 100 units by 1.08ha we get a density figure of 92.59 dwellings per hectare for a city centre site. The calculations for each zone are shown below:

City Centre
 70% housing = 70 units @ 75dph = 0.93ha
 30% flats = 30 units @ 200dph = 0.15ha
 Therefore 100 units = 1.08ha
 1 ha of land = (100/1.08) = **92.59 dwellings per hectare**

City Centre Extension Zone
 70% housing = 70 units @ 75dph = 0.93ha
 30% flats = 30 units @ 120 dph = 0.25ha
 Therefore 100 units = 1.18ha
 1ha of land = (100/1.18) =
84.74 dwellings per hectare

Urban Area
 70% housing = 70 units @ 50dph = 1.4ha
 30% flats = 30 units @ 100dph = 0.3ha
 Therefore 100 units = 1.7ha
 1ha of land = (100/1.7) =
58.82 dwellings per hectare

Suburban Area
 70% housing = 70 units @ 40dph = 1.75ha
 30% flats = 30 units @ 80dph = 0.375ha
 Therefore 100 units = 2.125ha
 1ha of land = (100/2.125) =
47.05 dwellings per hectare

Rural/Villages
 100% housing = 100 units @ 30dph = 3ha
 Therefore 100 units = 3ha
 1 ha of land = (100/3.00) =
30 dwellings per hectare

8.31 By calculating the net site area for each site and then applying the density figure to achieve the appropriate housing/flat mix we then have a total estimated number of dwellings for each site. For example for Site 276 (Nestle South):

Nestle South (Site 276)

Gross site area: 7.82ha

Net Site Area: 5.47ha

Density (CC Extension Zone*): 84.74dph

Total estimated Yield – 464 dwellings

325 houses (70%) and 139 flats (30%)

** The site is located in the suburban zone but an element of the scheme will be the re-use and conversion of existing factory buildings so the density is likely to be higher than the typical suburban figure. The Development Brief states that the site could be suitable for relatively high density houses but that very effort should be made to provide an appropriate mix of house types and sizes in accordance with the SHMA.*

Estimating the Affordable Housing Potential of each site

- 8.32 Improving the quality and availability of decent affordable homes in York is one of the Council's Corporate Priorities over the next four years. Currently, the actual need for affordable housing in the city outstrips the total supply coming forward each year. In effect there is technical justification for 100% affordable housing, although this is clearly not an economically viable option.
- 8.33 PPS3 provides the following definition of Affordable Housing: 'Affordable housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market.'
- 8.34 RSS advises giving early priority to providing more affordable housing through the planning system, drawing evidence from Strategic Housing Market Assessments (SHMA 2007) and other more detailed local assessments. To enable the North Yorkshire sub-region to maximize opportunities for the provision of affordable housing and address need, the RSS policy H4 provisionally estimates that 40% of new housing in York may need to be affordable.
- 8.35 York is a high demand area for housing, partly as a result of its proximity to Leeds and largely because it is an attractive place to live. High demand areas typically see significant levels of in-migration, as well as the demand created by newly forming households and existing households needing to move within the city.
- 8.36 Recent research (SHMA 2007) shows that (based on the last three years moves) in-migrants are typically more wealthy than existing households in York and considerably more affluent than newly forming households in the City. The Local Authority cannot control who purchases a property on the open market and therefore, in high demand areas, households on lower incomes are priced out of the market as house prices outstrip incomes.
- 8.37 The Council currently seeks to meet affordable housing need both directly, through its role as a social housing landlord of over 8,000 homes, and also in an 'enabling' role through policies and initiatives that ensure additional

affordable homes are provided by other means. The use of planning policy is especially important in this respect; providing new affordable homes through securing on-site provision, as well as some off-site or financial contributions, through negotiations on individual planning applications.

- 8.38 The current 50% affordable housing policy in York was approved by elected members in April 2005 and backed up by a Housing Needs Survey (carried out in accordance with government guidance), and was first undertaken in 2002 and then updated in 2006. The City Council's planning policy on affordable housing has provided a clear and consistent policy framework for the city which has, to date, secured over 1,500 new affordable homes (completions and outstanding permissions) for local families, couples and single people since the policy has been operating. The Government Office has cited it for Yorkshire & The Humber as an exemplar of good practice.
- 8.39 Evidence of sites coming forward since the SHMA supported the 50% policy demonstrates that the provision of 50% affordable housing on site is achievable, especially on unconstrained greenfield sites. However, it is acknowledged that complex brownfield sites have very high on-site costs and may not always be able to realise 50% affordable housing. There may be contaminated sites, for example, with very high clear up costs, which could not have been fully identified at the time of land acquisition. The existing Local plan Policy H2A is a maximum target and officers have been consistent but flexible in negotiations where developers have demonstrated that abnormal site costs mean that this figure cannot be fully met for reasons of site viability. Thresholds and levels set out in the policy are currently being tested through a viability assessment, to establish whether they are viable for green and brownfield sites.
- 8.40 The economic downturn has led to a slowing down in housing applications coming forward and, in some cases, construction on sites has stopped. Since the majority of new affordable housing in York is currently secured as part of private developments, this has inevitably led to a slowing up of affordable housing coming forward.
- 8.41 Whilst the policy, and subsequent negotiations, have been consistently applied there has been concern from the development industry that the 50% target is too challenging on medium size sites, and that the threshold above which the policy applies means that house builders will look to build on small sites (i.e. below the threshold of 15 homes) as a first priority.
- 8.42 These concerns have been acknowledged and, in June 2008, meetings were held with individual house builders and planning consultants in order to further pursue the representations. This was reinforced with a workshop later in the year, which involved key housing stakeholders, and aimed to understand concerns and explore initiatives to provide more affordable housing in the city.

- 8.43 As part of work on the emerging Core Strategy officers are developing an appropriate affordable housing policy based on evidence from the SHMA and the recent consultation events with key housing stakeholders.
- 8.44 For the purposes of the SHLAA potential affordable housing contributions of sites have been based on the current policy (H2a). This policy seeks 50% affordable housing on sites above 0.03ha/15 dwellings in the urban area and sites above 0.03ha/2 dwellings in rural areas. As the Core Strategy emerges the SHLAA will incorporate any revisions to the affordable housing policy and these will be presented in the annual review of the SHLAA through the Annual Monitoring Report (AMR).
- 8.45 It is recognised that 50% is not necessarily achievable on all sites, particularly on brownfield sites, which may have high on-site costs, but for the purposes of this assessment the affordable housing estimates are there as an indicative guide as to what level of affordable housing may be achievable through identified sites. The figures represent the optimum policy level of achieving 50% affordable housing.

Estimating Housing Types

- 8.46 As detailed earlier in the report the indicative housing mix has been based on achieving 70% houses and 30% flats on all sites except for rural sites where 100% housing would be expected. The total number of houses has then been broken down further into an estimate of the number of detached, semi-detached and townhouses expected in each zone. This has been done in order to be able to analyse the viability of the sites and does not represent what will be achieved on a site. The viability analysis is explained later in this report. Please refer to section 7(C).
- 8.47 Figure 10 shows the indicative split of house types that has been applied to the sites according to which they zone they fall in. It is important to note that this is an indicative mix based on past trends and is used for the purpose of the SHLAA as a guide for working out the viability of sites. It does not represent what will necessarily be achieved on the sites if they are to be developed. Site specific standards will be developed through the Allocations DPD in order to address York's locally identified housing needs, guided by the Strategic Housing Market Assessment.

Figure 10: Housing Types

Sub-Market	House Type
City Centre	100% townhouses
City Centre Extension Zone	100% townhouses
Urban	85% townhouses 15% semi-detached
Suburban	33% townhouses 33% semi-detached 34% detached
Rural/Villages	25% townhouses 25% semi-detached 50% detached

STAGE 7: Assessing when and whether sites are likely to be developed

- 9.1 Assessing the suitability, availability and achievability of a site provides the information on which the judgement can be made in the plan-making context (through the Allocations DPD) as to whether a site can be considered deliverable, developable or not currently developable for housing development.
- 9.2 To be considered:
- Deliverable – a site is available now, offers a suitable location for housing development now and there is a reasonable prospect that housing will be delivered on the site within 5 years from the date of adoption of the plan¹⁹; and
 - Developable – a site should be in a suitable location for housing development, and there should be a reasonable prospect that it will be available for and could be developed at a specific point in time²⁰.
- 9.3 Where it is unknown when a site could be developed, then it should be regarded as not currently developable. This may be for example, because one of the constraints to development is severe, and it is not known when it might be overcome.
- 9.4 In practice the considerations to be taken into account when deciding whether a site is deliverable, developable or not currently developable, will be the same. It is the *degree* of availability and achievability, and, in particular, when any known constraints can realistically be overcome. The guidance states that the assessment of deliverability / developability of specific sites should be made irrespective of the level of housing provision that is actually needed over the plan period.

Stage 7a: Assessing suitability for housing

- 9.5 Each site has been assessed against a number of criteria indicating suitability for development. The criteria are not placed in order of importance and no greater weight is attached to any one compared with any others. The only exception to this is that the assessment of primary constraints always occurred first, in order to eliminate the land that was environmentally not suitable for development no matter what the remaining criteria indicated.

¹⁹ See Paragraph 54, PPS3

²⁰ See Paragraph 56, PPS3

Introduction to Directions for Suitability Assessment

- 9.6 Each of the sites has been assessed using a suitability assessment proforma. Diagram 1 shows a blank example of the proforma.
- 9.7 Text in the 'Comments' column for each criterion consists of the facts gathered from GIS mapping, site survey and consultation work.
- 9.8 Positive opportunities (as opposed to constraints) that development might offer are shown in underlined type. This may cover a wide spectrum of factors ranging from minor advantages to compelling reasons for development.
- 9.9 All other text that is not underlined signifies potential constraints or facts affecting development whose impacts are harder to measure or whose impacts are neutral or currently unknown.
- 9.10 It is important to state that the policy restrictions and physical and environmental conditions were not applied in an absolute way. These criteria have been examined at the holistic level, considered alongside current use, surrounding uses and possible mitigation measures that could be employed to deal with any constraints. The consideration of all these factors will together lead to a determination of suitability or otherwise.
- 9.11 Each site was assessed on the basis of whether it was suitable, had the potential to be suitable with appropriate mitigation or whether it was unsuitable. Some examples of potential mitigation measures include the remediation of contaminated land or the provision of a compensatory area of open space.
- 9.12 A simple 'traffic-light' system then colour codes the assessment for each criterion, balancing all considerations in the text to its right. **Red** indicates the presence of immovable, absolute constraints or circumstance that would render development less suitable or viable, even if other positive criteria may exist. **Amber** indicates constraints or circumstances that may need to be overcome (ranging from the easily overcome to the more difficult) before development becomes suitable or viable. **Green** indicates that on this criterion, the site is suitable for development. Inevitably, in all locations, some constraints are present, and it is important to note that a **green** assessment does not indicate a total lack of constraints; rather, fewer, or less serious constraints that an **amber** assessment would indicate.
- 9.13 The relativity of all traffic-light judgements also means that a **red** assessment does not necessarily mean 'no development under any circumstances whatsoever' in any location. As so many different constraints to development exist an absolute assessment would result in almost every criterion receiving an amber assessment, which would reduce

significantly the value of the study as a tool to aid in the difficult decisions needed on the suitability of sites for development.

Diagram 1: Example of Site Suitability Proforma

Site Suitability		
Criteria	Considerations	
Primary Constraints		Green
Location Suitability		Amber
Transport and Accessibility		Amber
Geo Environmental Considerations		Amber
Strategic Policies		Red
Comments: .		
Recommendation:		

9.14 An overall assessment and recommendation covering the suitability or otherwise of each site then summarises and reviews the opportunities and constraints presented under each of the sub-headings, culminating in a single-line recommendation on the suitability or otherwise of the site for future housing development.

Criterion 1 – Primary Constraints

9.15 When assessing site suitability the first indication of land suitable for housing came from analysis of immovable environmental constraints or protective designations on the land covered. This first phase of assessment relied principally on GIS mapping and had the effect of ‘sieving’ out those areas where development would be inappropriate. Three primary constraints were assessed: Flood risk; Statutory and Non-Statutory environmental designations and Preserving the Historic Character and Setting of York.

Minimising Flood Risk

9.16 PPS25: Development and Flood Risk sets out a sequential approach to allocating sites as part of development plan policy based in the evidence of Strategic Flood Risk Assessments. PPS25 grades land into four zones, Zone 1 (low probability of flooding), Zone 2 (medium probability of flooding), Zone 3a (high probability of fluvial flooding) and Zone 3b (Functional floodplain). PPS25 presents a presumption against housing development in Flood Risk Zone 3b and the SHLAA Regional Practice Guidance suggests that ‘it is therefore reasonable for most authorities in the region to consider Flood Risk Zone 3b as part of the suitability test’.

9.17 Flooding is a key planning local planning issue for York. As part of the background work on the LDF the Council, working closely with the

Environment Agency, has produced a Strategic Flood Risk Assessment. This work identifies those areas of York that are susceptible to the highest level of flood risk from river flooding (higher than 1:100 year probability). When considering the potential influence of flooding on the location of development it is important to recognise the likely impacts of global warming and climate change, therefore sites falling into Zone 3b (functional floodplain) are considered unsuitable for housing development. Map 1 in appendix 4 illustrates the extent of flood zone 3b.

Statutory and Non-statutory environmental designations – Protecting and Enhancing York’s Green Infrastructure

- 9.18 Protection of areas with nature conservation value is viewed as a key element in ensuring sustainable development. Government Guidance (PPS9) states that plans should seek to promote sustainable development by ensuring that biological and geological diversity are conserved as an integral part of social, environmental and economic development.
- 9.19 The most recent national planning guidance on development in rural areas (PPS7) indicates that ‘rigid local [environmental] designations...may unduly restrict acceptable sustainable development’ and that it is therefore preferable to replace them with criteria based policies in Local Development Documents (LDDs) instead²¹.
- 9.20 According to PPS7, non-statutory local designations should not be regarded as absolute constraints to development. However, initial assessment of the location of all land protected by such designations revealed, in the judgment of officers, that sufficient land exists within the City of York area not covered by such designations to accommodate the likely quantum of development that is required. For this reason nationally and locally significant nature conservation sites and land within regional level green corridors are considered unsuitable for future housing development. Map 2 in appendix 4 shows the areas of land excluded.
- 9.21 Should it prove to be the case at a later stage that insufficient undesignated land is available for the quantum of development required (and/or a local designation is ‘unduly restricting acceptable sustainable development’ in a particular location) a judgment will be required as to where designated land may need to be developed. Such an approach is bolstered further by the fact that at this relatively early stage in the process of producing LDF’s, the criteria-based policies in LDDs referred to by PPS7 that will eventually replace map-based designations are still under development.

²¹ Planning Policy Statement 7: Sustainable Development in Rural Areas, Office of the Deputy Prime Minister, 2004 (Paragraph 24).

Preserving the Historic Character and Setting of York

- 9.22 'The Approach to the Green Belt Appraisal' (2003) study carried out by the Council indicated that regardless of the extent to which the City may have to identify further land to meet its development requirements and needs, there are areas of land outside the built up area that should be retained as open land due to their role in preserving the historic character and setting of York. The areas of land considered to serve this purpose are illustrated in Map 3 in Appendix 4.
- 9.23 The Approach to the Green Belt Appraisal (2003) also indicated that there are areas of land outside the built up areas that should be retained as open land as they prevent communities from merging into one another and the city. These areas were considered to have a key role in preserving the identity of the settlements and villages around York. The relationship of York to its surrounding settlements is a key element of the City's character. This relationship is not simply about the distance between the settlements but also their size.
- 9.24 For the SHLAA all sites falling within these important areas have been excluded from further assessment and they are not considered to be suitable for housing development.
- 9.25 Figure 11 shows the sites that were excluded from further assessment due to failing one or more of the primary constraints. The boundaries of sites partially located in the primary constraint areas were amended to remove the constraint element to ensure that any suitable sites were not missed if the remainder of the site was above the site threshold of 0.2 hectares. The site assessment proformas complete with map for each site can be found in Appendix 5.

Figure 11: Sites failing Primary Constraints

Site ID	Site Name	Reason for failing primary constraint
2	Manor Farm Towthorpe Haxby	Green Belt Appraisal Area
24	Land at Stockton Lane	Green Belt Appraisal Area
32	Land at Murton Way	Flood Zone 3b
33	Acaster Lane Bishopthorpe	Flood Zone 3b Nature Conservation Site Green Belt Appraisal Area
34	Land at Church Lane Bishopthorpe	Flood Zone 3b Green Belt Appraisal Area
35	Common Road and South East of Dunnington	Flood Zone 3b
41	Land at Millfield Lane and Farm	Flood Zone 3b Green Belt Appraisal Area

58	Rear of Netherwoods and the Village Strensall	Flood Zone 3b
61	Land off Stockton Lane	Green Belt Appraisal Area
63	North of Vicarage Lane South of Prospect farmhouse	Green Belt Appraisal Area
64	South of Vicarage Lane Naburn	Green Belt Appraisal Area
65	Rear of Garden bordering Maypole Grove	Green Belt Appraisal Area
66	land Off Main street Elvington	Green Belt Appraisal Area
74	Opposite Designer Outlet Naburn	Green Belt Appraisal Area
75	Severus Hill, Acomb Water Tower	Nature Conservation Site
78	St Johns Playing Field	Flood Zone 3b
80	Westfield Lane Wigginton	Green Belt Appraisal Area
83	North and South of Copmanthorpe	Green Belt Appraisal Area
94	land between 536 York Road and Farriers Chase	Green Belt Appraisal Area
95	The Old School Playing Fields Haxby Road	Green Belt Appraisal Area
97	St Barnabas CE Primary School, Bright Street	Green Belt Appraisal Area
100	Yorkfield Lane Copmanthorpe	Green Belt Appraisal Area
105	Manor Close	Green Belt Appraisal Area
107	Melrosegate Field Melrosegate	Flood Zone 3b
122	Rosedale, Clifton Park	Green Belt Appraisal Area
145	Former nursery opp Wyedale Garden Centre, A59	Green Belt Appraisal Area
146	Redundant nursery, Field Lane, Heslington	Green Belt Appraisal Area
160	Land North of Windsor Drive, Wigginton	Green Belt Appraisal Area
161	Opposite the former Cattle Breeding Centre Stockton-on-the-forest	Green Belt Appraisal Area
163	Land to the east of York Road, Naburn	Green Belt Appraisal Area
167	Land West of Shipton Road, Skelton	Green Belt Appraisal Area
172	Millfield Farm and Land (C)	Flood Zone 3b Green Belt Appraisal Area
172	Millfield Farm and Land (B)	Flood Zone 3b Green Belt Appraisal Area
173	Bustardthorpe Allotments	Green Belt Appraisal Area
174a	Land alongside A64/Sim Balk Lane	Green Belt Appraisal Area
174b	Land alongside A64/Sim Balk Lane	Green Belt Appraisal Area

182	Land at Murton	Green Belt Appraisal Area
183	Land at Parkers Pig Farm	Green Belt Appraisal Area
186	York Riding School	Green Belt Appraisal Area
189	Acomb Wood drive, adj. to Acomb Shops and wood	Nature Conservation Site
224	Land RO Terrington Close / Jaywick Close	Nature Conservation Site
229	RO The Lodge, Sandy Lane	Green Belt Appraisal Area
230	Conservation Area (alternative land at changes 3)	Nature Conservation Site
236	Land between Fulford Ings / Bowling Green off St Oswald's Ro	Flood Zone 3b
270	Land RO properties on Lindon Close / Drakes	Flood Zone 3b
286	Fox & Hounds 39 Top Lane Copmanthorpe	Green Belt Appraisal Area
46	Farfield Farm/Skelton Nurseries	Green Belt Appraisal Area and Flood Zone 3b
47	Either side of Haxby Road, A1237	Green Belt Appraisal Area
191	Naburn Marina	Green Belt Appraisal Area

Criterion 2 – Location Suitability

Location

9.26 The location of the site has been recorded and put into one of the following categories:

- i) Within the urban area of York
- ii) Within a Local Service Centre (Haxby & Wigginton, Strensall / Towthorpe and Upper and Nether Poppleton)
- iii) Within a village (Bishopthorpe, Copmanthorpe, Skelton, Dunnington)
- iv) Within a small village (those villages and settlements not identified in i), ii) or iii)
- v) On the edge/ adjacent to the York Urban Area
- vi) On the edge / adjacent to a Local Service Centre
- vii) On the edge / adjacent to a village
- viii) Not located within a settlement.

Brownfield or Greenfield

9.27 The type of land has been recorded as brownfield, greenfield or mixed.

Flood Risk

- 9.28 The flood risk zone has been recorded for each site from flood zone 1 (low risk of flooding) to Zone 3a (high probability of flooding). Sites falling within flood zone 3b (functional floodplain) have already been excluded as unsuitable for housing development under criterion 1. Sites that are recorded as Greenfield **and** fall within flood zone 3a (high probability of flooding) will automatically be given 'Red' for location suitability and would be given a recommendation of 'unsuitable for housing development'. In addition, Greenfield sites within flood zone 3a are considered unsuitable for housing development.

Criterion 3 – Transport and Accessibility

- 9.29 The transport and accessibility assessment has looked at the accessibility of sites to existing local services; access to frequent public transport routes; access to existing/proposed cycle routes, access issues and an initial comment from CYC Highways officers.

Accessibility to Services

- 9.30 The government's principles for sustainable communities are that they should be based on good access to local services. Development should be located where everyone can access key services through walking, cycling or public transport (PPS1). Policy YH6 of the RSS states that in order to create attractive and vibrant places and communities, plans should seek to retain and improve local services and facilities, particularly in Local Service Centres.
- 9.31 As part of the SHLAA we considered the characteristics that make an 'ideal neighbourhood', based on the RSS Sustainable Settlement Study (2004) and work produced to support the Urban Task Force's 'Towards an Urban Renaissance' Report. One key characteristic of an 'ideal neighbourhood' is identified as access to local services. Access to services mapping has identified the following as key services: a primary school; health centre/GP surgery and a local food shop to meet day-to-day needs.
- 9.32 Accessibility to these key services has been assessed using GIS mapping. Based on the RSS accessibility criteria distance to services has been measured based on a five-minute walk (400m) and 10-minute walk (800m). The GIS measures accessibility from any part of the site.
- 9.33 Where a large site has been suggested an assessment has been made as to whether the site could provide new on-site community facilities, which would mitigate against an existing lack of access. Where this is the case a comment has been made on the proforma. For all sites over 5 hectares

30% of the gross site area has been excluded for the provision of on-site facilities and open space as detailed in section 6.

Accessibility to Public Transport

- 9.34 The location of housing, employment, retail and leisure and key services within an area have a significant impact on the number and type of journeys made. Careful consideration of the location of development and mix of uses within it can significantly reduce the need to travel. This is achieved by encouraging those people that have to travel to do so more sustainably by being located close to public transport routes; and by ensuring that the day to day services that people need are within walking distance of their homes.
- 9.35 Sites have been assessed on their accessibility to frequent bus routes / park and Ride (offering a 15 min frequency service) within a 5 minute walk (400m) and 10 minute walk (800m); accessibility to a less frequent bus route (less than 15 minute frequency) within a 5 minute and 10 minute walk; accessibility to an existing or proposed rail station/rail halt within a 5 minute walk and accessibility to an existing or proposed cycle route within 100m.
- 9.36 Accessibility to transport/cycling routes has been assessed using GIS mapping and is measured from any part of the site.

Highways Comments

- 9.37 Due to the significant number of sites assessed at this stage and following discussion with CYC Highways officers it was decided that as part of the SHLAA assessment only brief initial comments would be given at this stage. Further more detailed highways analysis would take place as part of work on the Allocations DPD where more detailed site-specific work will be undertaken.
- 9.38 Individual highways comments have been given for all sites within the existing urban area of York. For all other sites a general comment has been made by Highways officers that a 'transport assessment/statement is required'.

Criterion 4 – Geo-environmental Considerations

- 9.39 In most cases the geoenvironmental constraints noted are not absolute, and regulatory systems are in place to cover those that emerge. However, these constraints have the potential to increase development cost and lead-time and therefore are relevant to the SHLAA.

Contamination Issues

- 9.40 Officers from the CYC Environmental Protection Unit (EPU) have reviewed the sites for potential sources of contamination and have made individual comments on the sites, which have been added to the proforma. Sites have been assessed in terms of low, medium and high risks of contamination and appropriate mitigation measures suggested.

Air Quality Issues

- 9.41 Officers from the CYC Environmental Protection Unit have reviewed the sites for potential air quality issues and have provided comments, which have been recorded on the site proforma.

Noise and Vibration Issues

- 9.42 Officers from the CYC Environmental Protection Unit have reviewed the sites for potential noise and vibration issues and have provided comments, which have been recorded on the site proforma.

Drainage Issues

- 9.43 CYC drainage officers have been consulted as part of the SHLAA and their advice was to provide general comments at this stage as more detailed work would be required as part of the Allocations DPD.

Agricultural Land

- 9.44 The quality of agricultural land has been recorded if applicable to the site using GIS mapping. The adverse implications of losing Grade 1 and 2 agricultural land are recognized by PPS7, which states that the loss of agricultural land should be taken into account as a development consideration but notes that in some cases, development of Grade 1 or Grade 2 agricultural land may be unavoidable, where building elsewhere 'would be inconsistent with other sustainability considerations'. PPS7 concludes that 'it is for Local Planning Authorities to decide whether best and most versatile agricultural land can be developed, having carefully weighed the options in the light of competent advice²². Agricultural land quality should therefore not be regarded as an absolute constraint to development and has been recorded on the proforma for information purposes to be weighed up with the other suitability considerations.

Overhead Power Lines/Pylons/Electricity Sub-Station

- 9.45 As part of the site survey carried out for the SHLAA sites the presence of overhead power lines/pylons and/or electricity sub-stations within or

²² PPS7, paragraphs 28-29.

adjacent to the site was recorded and has been included on the proforma. In most cases this constraint would not be absolute but would be likely to increase development costs and lead time so is relevant as part of the suitability assessment.

Criterion 5 – Strategic Policies

9.46 The following issues have been considered as part of the Strategic Policies section:

Green Belt

9.47 It is the role of the LDF Core Strategy to determine the approach to York's Green Belt including both its role and lifespan. The LDF will create a permanent green belt for York that preserves its special character and setting, whilst ensuring sustainable development; and that the green belt boundaries once set will endure until at least 2030.

9.48 Green Belt is a strongly defined policy tool and one, which attracts significant interest from stakeholder and the public. The SHLAA is intended to inform evidence in the long-term and both the CLG guidance and the Regional Practice Guide on undertaking SHLAA's state that for this reason there would need to be a robust reason to exclude Green Belt Sites from the Assessment. The issues that including Green Belt sites might subsequently raise can then be resolved through the policy-making process and Green Belt status will be useful to include in the assessment criteria.

9.49 As the Core Strategy is still emerging the Green Belt Boundaries for York are as yet not set. For the purposes of the SHLAA sites that fall within the areas of land identified as being important in preserving the City's historic Character and Setting, as identified in the 'Approach to The Green Belt Appraisal' (2003), have been excluded from further assessment as detailed in Criterion 1.

9.50 All sites falling within the other areas of the Draft York Greenbelt have been noted on the proforma but have not been excluded from further assessment. If a site is considered suitable for housing overall but is within the greenbelt the recommendation:

*' This site is potentially **suitable** for housing development. However, this site is located within the draft greenbelt and would therefore only come forward in line with the emerging core strategy and following a detailed evaluation of the greenbelt value'*

has been noted on the proforma and all sites within the draft green belt that are potentially suitable for housing have been grouped together in terms of their availability. The sites may need to be assessed further for their

suitability as part of the Allocations DPD where detailed green belt boundaries will be set.

Open Space

- 9.51 The Council has a duty to protect and enhance both the natural environment of York and its open space. All nature conservation sites, including Sites of Specific Scientific Interest (SSSI's), Sites of Importance for Nature Conservation (SINCS) and Local Nature Reserves (LNR) have been identified on the GIS mapping system and any sites that falls wholly within one of these areas has been excluded from further assessment as detailed under criterion 1 (Primary Constraints).
- 9.52 Through the LDF the Council will consider the quality, quantity and accessibility of open space (sport, recreation and children's play facilities) across the City, in order to assess the existing and future needs of the residents of York. The aim is to enhance the provision of new open space, improve the quality of existing open space and to ensure that all residents have access to an appropriate range of recreational open space and sports facilities in order to promote healthy lifestyles.
- 9.53 Government guidance on open space, sport and recreation (PPG17) states that local authorities should undertake robust assessments of the existing and future needs of their communities for open space, sport and recreational facilities. RSS also recognizes the importance of open space, sport and recreation and the role it plays in helping to improve the health of residents and policy YH8 (Green Infrastructure) seeks to protect open space and playing fields, particularly in urban, urban fringe and adjacent countryside areas, through defining a hierarchy of green infrastructure.
- 9.54 The Council has recently published, as part of the LDF evidence base, an 'Open Space, Sport and Recreation Study' produced by consultants PMP. A city-wide consultation gave a picture of overall local need in York and a site survey identified the total supply of sites. These sites were then assessed for their accessibility, quality and wider benefits including their biodiversity value.
- 9.55 For the SHLAA, sites put forward for development, which are identified as open space within the Open Space Study, have been identified as existing open space on the proforma. Although this is not considered an absolute constraint to redevelopment the Council will seek to protect open space in York especially in areas where a deficiency has been identified.
- 9.56 In addition to identifying sites, which are, identified open space an assessment has been made as to the sites accessibility to types of open space within PPG17 acceptable distances. This includes city parks, local parks, natural/semi-natural green space, outdoor sports facilities, amenity green space, children's open space, young peoples facilities and allotments.

Employment Land Review

- 9.57 The findings of the Draft Employment Land Review (ELR) has helped to identify sites that are potentially no longer suitable for employment use or may have longer –term redevelopment opportunities, which may involve an element of residential use. Sites which have been short listed in the Draft ELR as being the most suitable sites for employment use have been included in the assessment if they were submitted as part of the Call for Sites exercise but the findings of the ELR have been used to make a judgement on the sites suitability for housing development.

Special Historic and Built Environment

- 9.58 York's historic heritage is amongst the richest in England, and is a significant asset and resource for the city. Government guidance (PPS1) asserts that high quality and inclusive design means ensuring that a place will function well and add to the overall character and quality of the area, not just for the short term, but over the lifetime of the development. It states that good design is indivisible from good planning, and should respond to its local context and create or reinforce local distinctiveness, and advises that design which fails to take the opportunities available for improving the character and quality of an area should not be accepted.
- 9.29 In preparing development plans, Government guidance (PPS1) also advises that we should seek to enhance as well as protect the historic environment, landscape and townscape character.
- 9.60 Statutory protection for, and guidance on, the historic environment is provided through the Planning (Listed Buildings and Conservation Areas) Act 1990, Ancient Monuments and Archaeological Areas Act 1979, and government guidance (PPG15 and PPG16)²³. The guidance requires that the Council puts in place policies to preserve and enhance the historic environment, including policies for protection, enhancement and preservation of sites of archaeological interest It also provides the scope for the Council to designate Conservation Areas. Government has announced a program to update PPG15 and 16, with work to begin in 2009.
- 9.61 In recognition of the city centre's sensitivity to change, the council is preparing an Area Action Plan (AAP). This will provide a vision and a series of detailed policies to help manage York's city centre. At Issues and Options stage it considered options for ensuring successful management of the Central Historic Core Conservation Area, good design and an improved public realm. The aim is to retain York's unique and special character, to put in place a robust framework for ensuring the highest

²³ Listed buildings, archaeological deposits, Conservation Areas, historic parks and gardens or battlefields.

quality of design, and have world class interpretation of York's unique history and archaeology. York's unique character and form stretches beyond its central core, resulting from change and development throughout many centuries.

- 9.62 Significant work to understand landscape and townscape character has already been undertaken and is being used to inform the Core Strategy and the City Centre Area Action Plan. For the purposes of the SHLAA an assessment has been made of a sites proximity to listed buildings, Scheduled Ancient Monuments, Historic Parks and Gardens, Conservation Areas and Areas of Archaeological Importance. The general principle has been that, if sensitively designed, it is possible to accommodate development in proximity to such locations however issues will need to be dealt with at the site-specific level and at this stage in the process heritage designations have been recorded as possible constraints that would require more detailed assessment and liaison with the relevant CYC officers.

Initial Site Filtering

- 9.63 Following the assessment of suitability, all sites deemed unsuitable were removed from the study. Sites were removed if they had been developed and had no remaining capacity, they had greater potential for other uses e.g. as valuable employment land or a substantial part of a greenfield site was located within flood zone 3a. The boundaries of sites partially located in Flood Zone 3a were amended to remove the flood zone 3 element to ensure that any suitable sites were not missed. Other factors such as open space designations and poor access were considered and where mitigation measures were possible, they were considered to be suitable.
- 9.64 Regional Practice Guidance on SHLAA indicates that it is 'reasonable for outright 'unsuitable', 'unavailable', or 'unachievable' sites to be held in abeyance (not considered as 'on the conveyor') for the purposes of the outcome of a particular round of assessment²⁴.
- 9.65 However, to 'delete' sites from the database is to create unnecessary work re-entering sites for future assessments, which are likely to be subject to, updated deliverability tests. The information gathered through the assessment will help inform future decisions on interventions, which could address particularly suitable sites, which are currently deemed unavailable or unsuitable.
- 9.66 Figure 12 lists all sites removed from the SHLAA as being unsuitable. Appendix 6 includes full site proformas and maps for these sites.

²⁴ Paragraph 6.8.1 Undertaking Yorkshire and Humber's Strategic Housing Land Availability Regional Practice Guide, April 2008.

Figure 12: Sites removed from the SHLAA as being unsuitable

Site Ref	Site Name
9	'Nova Scotia' North Lane Huntington
10	Foss Bank Farm
26	Land between Intake Lane and Eastfield Lane, Dunnington
28	The Retreat, Heslington Road
30	Land off Avon Drive, Huntington
43	Land North of Ring Road Clifton Moor
44	Salisbury Lane, Bowling Green
52a	Wheatlands, Northfield Lane
52b	Northminster Business Park
73	Land Adjacent to Grimston Bar and A1079
76	Land at Intake Lane
77	Land behind Fifth Avenue backing onto cycle track
85	To the Rear of Blue Coat
96	Land to the East of A19 Escrick
98	Pool Bridge Farm
99	Murton Way, Osbaldwick
113	Burton Green
132	Site E, Airfield Industrial Estate, Halifax Way
134	Elvington Airfield
144a	Land at Sandy lane, Stockton-on-the-forest
144b	North Carlton Farm, Stockton-on-the-forest
154	Acres Farm, Naburn
158	Land to west of Elvington Airfield Business Park
166	Elvington Park
168	Elvington Airfield Inset
169	Willow Court Farm, Holtby
181	Land North of Grimston Bar, Osbaldwick
184a	The Paddock, Acomb Grange
184b	Land West of Chapelfields
185	Bramham Road Flats Block 1 and 2
187	Bellhouse Way, Foxwood
198	Land north of Sledmere Crossing, Dunnington
218	Land to RO 33 -20 Pasture Close
220	Land off Westpitt Lane, Strensall
226	Keeble Park North, Bishopthorpe
249a	Land adjacent Field lane
249b	Land adjacent field Lane
250	Land at Hollyrood Drive
251	Land at Kingthorpe
252	Land at Osprey Close
253	Land between Alness Drive / Acomb Wood Drive
254	Land off Acomb Wood Drive
255	Land at Leven Road

261	Playing field adjacent to Rawcliffe Library
262	Tennis courts, Water Lane
263	Car Park adj. Homestead Park (off Shipton Road)
265	Land adjacent to Water End, Clifton
266	Land off landale road
268	Land RO Lavender Grove/ adj Ouseacre allotments
271	Land at white rose Grove
273	Land off Alder Way
274	Land off Jockey lane

Stage 7b – Assessing Availability for Housing

- 9.67 According to the Guidance, a site is considered available if there is confidence that there are no legal or ownership problems. In assessing the **availability** of sites for housing, the Council has assessed land ownership constraints that may be associated with bringing sites forward. This has included identifying whether there are any obvious legal or ownership problems, including ransom strips or multiple ownership issues. It should be noted that the Council has not identified the ownership of every site within the SHLAA as this was considered too costly an exercise to do and information could quickly become outdated.
- 9.68 Instead the findings of the SHLAA are based on information held within various datasets and local knowledge, where available (e.g. through Uniform from planning applications or through evidence submitted through the Call for Sites exercise and the subsequent SHLAA consultation). The consultation exercise on the draft findings will present a further opportunity for developers and landowners to provide information on whether the site is available for development.
- 9.69 One of the main reasons for assessing the availability of sites is to identify whether sites are likely to come forward within a five year period (deliverability criteria) or that they may become available in the longer term (i.e. after five years).
- 9.70 Figure 13 shows an example of the availability part of the proforma. In this case ownership details for the site are known and have been established through the Call for Sites process and subsequent consultation with the landowner/agent. The site is in single private ownership and has been put forward as being available within 5 years by the landowner. However, as the site is located within the draft greenbelt it has been assessed as being available in the longer-term and would only come forward in line with the emerging Core Strategy and following a detailed evaluation of the green belt value.

Figure 13: Example of Availability Assessment

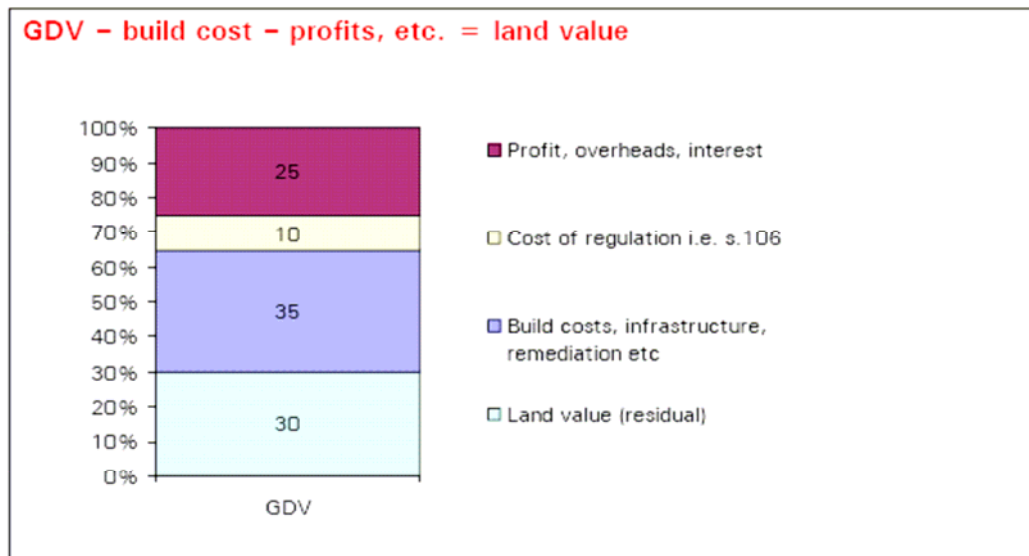
Criteria		Considerations					
Ownership		<ul style="list-style-type: none"> This site is in private single ownership 					Amber
Planning Status		<ul style="list-style-type: none"> This site has no outstanding planning permission This site is located within the draft greenbelt 					
Timescales		<ul style="list-style-type: none"> This site would be available in the long-term subject to the core strategy and a detailed greenbelt evaluation. 					
<p>Comments: This site is owned by the Wilberforce Trust and was submitted as part of the call for sites. The site is available for development but there are no outstanding planning permissions. This site is located within the draft greenbelt and would therefore only come forward in line with the emerging core strategy and following a detailed evaluation of the greenbelt value.</p>							
<p>Recommendation: This site may be available in the long-term subject to a detailed review of the greenbelt.</p>							
When is this site likely to come forward?	0 to 5 years (2008 – 2012)	6 to 10 years (2013– 2017)	11 to 15 years (2018 – 2022)	Over 15 years (2023 or later)	With Draft Greenbelt Boundary	Unknown	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Stage 7c – Assessing Achievability for Housing

- 9.71 Paragraph 40 of the Guidance states that ‘ a site is considered achievable for development where there is a reasonable prospect that housing will be developed on the site at a particular point in time.’ This is a judgement about economic viability and the capacity of a developer to complete and sell the housing over a certain period.
- 9.72 According to the guidance, the achievability of each site will depend on a combination of market factors, cost factors and delivery factors.
- 9.73 Valuing land can be an involved process and the more complex the challenges of developing a particular site the more complex the process of valuing it becomes. Land has value because of the use to which it can be put. Residential land is more valuable than farmland, which in turn is more valuable than contaminated land with no planning permission. It follows that land values are a residual; the value left after the cost of putting land to a particular use such as building homes. To assess the value of a piece of land it is therefore necessary to estimate the value of the homes that can be built on the site and the cost of building them.
- 9.74 The expected value of the homes that can be built on a given site, the gross development value (GDV) will be influenced by the precise planning permission, which has been granted. The overall density and the balance between houses and flats, starter and family properties will all influence the GDV of a development. Also crucially important are the economic conditions. When property prices are high GDVs will be boosted. In a downturn, like the current economic conditions, the position is reversed; falling property prices put downward pressure on GDVs.
- 9.75 The cost of a development can vary dramatically. The costs of construction can be increased by the need to demolish existing buildings or necessary land remediation. There may also be unusual costs (sometimes called abnormal costs), such as moving power lines. Having deducted these costs a homebuilder will then need to set a target profit margin and deduct this from the GDV as well. The required margin is typically between 20-25% on speculative residential development²⁵. The residual is the value of the land, the maximum amount a homebuilder will be prepared to pay for the site. Figure 14 gives an illustrated example of a standard residual valuation method.

²⁵ Homebuilding Market Study, Annex O – Calculation of Residual Land Values, Office of Fair Trading, September 2008.

Figure 14: Illustrative example of residual land valuation method (Office of Fair Trading, September 2008).



- 9.76 For the purposes of the SHLAA an indicative financial viability assessment was undertaken to appraise achievability on suitable sites. The financial viability assessment was conducted on those sites without planning permission. Where sites had planning permission for dwellings it has been assumed that the proposed development would be economically viable. This is on the basis that the applicant would have had to pay the planning fees and invest in the preparation of planning submissions and would only do this where the scheme would be built out economically or present an attractive proposition to the market where a site would be sold after attaining planning permission.
- 9.77 It is important to note that the financial appraisal is indicative and obviously subject to market fluctuations but the purpose of the assessment is to demonstrate that it is reasonable to assume that an economically viable scheme could be undertaken on the site. It was assessed that giving a simple YES/NO answer to cover achievability (i.e. is a site achievable: YES/NO) as the method of deriving the answer will not be open to scrutiny. It was decided that the financial appraisal would conclude that a scheme was Negative or Viable in terms of the site's economic viability.
- 9.78 To begin the financial appraisal it is necessary to calculate the indicative revenue value of the scheme:

Private Scheme Value

- 9.79 To calculate the indicative private scheme value the number of private dwellings calculated for each site (see section 6 – estimating the housing potential) has been multiplied by the ward average house price for each housing type (flats, townhouses, semi-detached and detached). The house

price information has been extracted from the Hometrack database to which the Council have subscribed. Hometrack provide high quality, up to date data for use by local authorities in the development and evaluation of housing and planning policies and strategies. The data offers house prices by size and type of home, open market rental data and housing costs across all forms of tenure and the importance of the data has been recognised in the Strategic Housing Market Assessment Practice Guidance published by CLG. The published Hometrack house price index is based on a monthly survey of estate agents across all postcode districts in England and Wales. The average price data is based on the achievable selling price for each of four standard property types in every postcode district.

- 9.80 The Hometrack data used is for November 2008. As the council now subscribe to the database it will be possible to regularly update the revenue costs to reflect fluctuations in housing costs. The Hometrack data for each ward is included in Table 1, Appendix 7.
- 9.81 Figure 15 shows an example of the private scheme value calculation for a site within Clifton Ward.

Figure 15: Private Scheme Value Calculation example

Revenue				
	Flats	Townhouses	Semi-detached	Detached
Hometrack house price for Clifton	£177,900	£173,800	£159,400	£431,700
Estimated number of private dwellings	70	162	0	0
Private Housing Scheme Value (average house price x estimated number of dwellings)	£12,453,000	£28,155,600	0	0
Total Private scheme value	£40,608,600			

Affordable Scheme Value

- 9.82 To calculate the indicative affordable scheme value advice has been taken from the City of York Council Housing Strategy team. In order to keep the appraisal as simple as possible we have taken the average purchase price for affordable housing in Section 106 agreements for a 2 bed flat and for a 3 bed house as these are the most common house types built.
- 9.83 For each of the house types – average flat and average house we have used the average purchase price for a social rented flat (£50,000) and a

discount sale flat (£65,000) and for a social rented house (£63,000) and a discount sale house (£90,000). Of the 50% affordable housing the council aims for a 60:40 split between social rent and discount sale respectively.

9.84 Figure 15 shows an example of the affordable scheme calculation for a site within Clifton Ward.

Average house price for affordable homes	Flats	House
	Social rented: £50k Discounted Sale £65k	Social rented £63k Discount sale £90k
Ratio of social rented to discount sale 60:40		
Estimated no. of affordable dwellings	70	162
Affordable Scheme Value	£3,920,000	£11,961,000
Total affordable scheme Value	£15,881,000	

9.85 The total scheme value is then calculated from combining the private and affordable scheme value.

The next part of the financial appraisal calculates the indicative build costs for each scheme.

Build Costs

Average Building Cost per dwelling

9.86 The average build cost per dwelling has been calculated using data from BCIS; the RIC's Building cost Information Service who are the leading provider of cost information to the construction industry. The Council's Property Services team have access to BCIS and we have liaised with the quantity surveying team who have been able to extract the relevant information from the Buildings Costs Calculator. The average basic building cost per dwelling has been extracted for the Yorkshire and Humber Region for each of the house types. The data is for the 3rd quarter of 2008. The basic build cost per dwelling for the Yorkshire and Humber region are:

- Flat = £32,720
- Townhouse = £43,494
- Semi-detached = £54,252
- Detached = £63,300

9.87 By multiplying the total number of dwellings by the building cost per dwelling we are able to calculate a total basic build cost for the scheme.

Site works costs per dwelling

9.88 In addition to the basic build cost per dwelling we have extracted from BCIS an average site works cost per dwelling to include for connection to electricity, gas, foul and surface drainage and surface finishing. This has again been through liaison and advice from Property Services.

The site works cost per dwelling used in the appraisal are:

- Flat = £5,500 per dwelling
- Townhouse = £9,000 per dwelling
- Semi-detached = £9,000 per dwelling
- Detached = £10,500 per dwelling

9.89 By multiplying the number of dwellings by the site work cost per dwelling we are able to calculate the total site works cost for the scheme.

9.90 The total basic building cost for the scheme and the total site works cost for the scheme have then been combined to give a total build cost for the scheme.

Other Costs / Profits

Land Value

9.91 To make the financial appraisal as simplistic as possible rather than leaving a residual amount after subtracting all other costs, which would be the assumed land value, we have deducted 40% of the revenue value of the scheme as being an indicative land cost. This has been based on liaison with the Council's Property Services Team and is a recognised residual value of around 30-40%.

9.92 Land values are obviously variable and more easily varied than any of the other elements such as build costs and profit. Land values rise and fall over time. From 1996 to 2006 land prices rose about 330%²⁶ while the cost of construction rose by about 50%²⁷ and house prices rose about 180%²⁸. Since the start of 2007 however, land values have fallen significantly. The SHLAA will be reviewed annually through the Annual Monitoring Report Process so the financial appraisal will be updated to reflect changes where necessary.

²⁶ For residential land with planning permission in England. Source CLG live table 563.

²⁷ Figure for Great Britain. Source 5.2, construction statistics annual 2007.

²⁸ Figure for Great Britain. Source: CLG live table 593.

Professional Fees

- 9.93 For the purposes of the SHLAA financial appraisal we have used an indicative figure of 10% of the total build costs (basic build cost + site works). This is to reflect costs for fees such as planning application fees, building control, consultant's costs etc. The figure of 10% is an average and costs will obviously vary from scheme to scheme however, it is thought to represent a realistic guide.

Contingency Sum

- 9.94 An indicative figure of 5% of total build costs has been built in for contingency purposes.

Interest on bank loans

- 9.95 An indicative figure of 2% of total build costs has been built in for interest on loans.

Profit Margin

- 9.96 Having deducted other costs such as construction costs and any abnormal costs the homebuilder will set itself a target margin and deduct this from the gross development value as well. The typical margin is around 20-25%. For the purposes of the SHLAA a developer profit of 17.5% of total costs has been built in. This figure is based on liaison with CYC officers and is thought to be a realistic figure for York.

All these 'other costs' have been combined to give a total 'other costs' figure.

Overall Viability Assessment

- 9.97 The overall financial appraisal is then calculated using the total scheme value and the total costs (build costs and 'other costs'). Comments have been added to the proforma where appropriate regarding likely abnormal development costs such as remediation works using the information from the site suitability proforma. An overall assessment is then made as to whether the site is viable or unviable based on the results of the financial appraisal. It is important to note that the financial appraisal is based on an indicative scheme and is only used as a guide to a sites likely achievability. Much more detailed site by site analysis will be required if a site progresses through the Allocations stage.

STAGE 8: ASSESSMENT RESULTS

Overall Capacity

- 10.1 Out of a total of 226 sites assessed initially, 49 were removed due to the assessment deeming them unsuitable due to failing one of more of the primary constraints (see Appendix 5).
- 10.2 A further 52 sites were removed due to the assessment deeming them unsuitable (see Appendix 6).
- 10.3 27 sites were placed in the unknown/unavailable category and have not been included within the potential future housing supply as there is insufficient information available to be able make a judgement about when and whether these sites may come forward for development. Completed proformas for these sites can be found in Appendix 12.
- 10.4 A further 42 sites have been placed in the 'Draft Green Belt' category. These sites have been assessed as part of the SHLAA as they have been submitted as part of the 'Call for Sites' exercise but they are located within the draft Green Belt and would therefore only come forward in line with the emerging Core Strategy and following a detailed evaluation of the Green Belt value. Completed proformas for these sites can be found in Appendix 13.
- 10.5 56 sites were considered deliverable and/or developable and placed within estimated five-year blocks of delivery. These 56 sites could theoretically provide 6,866 dwellings. Completed proformas for these sites can be found in Appendices 8 to 11.

Figure 16: Overall Non-committed Supply (including allocations without permission and identified SHLAA sites)

Period (Financial Years)	Number of dwellings	Number of Sites (double counting sites)
0-5 (2008/9 - 2013/14)	1,754	22
6-10 (2014/15 – 2018/19)	2,955	26
11-15 (2019/20 – 2023/24)	1,709	5
15+	448	3
Total Non-Committed Supply	6,866	56

10.6 The housing potential of the 56 deliverable/developable sites has been calculated and the estimated number of dwellings has been distributed across individual years to predict when dwellings would be delivered. In some cases a site appears in more than one five year period due to the phasing of dwelling completions. To avoid double counting it is necessary to identify those sites that fall into more than one 5yr period. Figure 17 identifies the 9 sites where a site is included in multiple 5yr periods due to phasing the construction of dwellings on the site.

Figure 17: Sites appearing in multiple 5-year periods

Site No	Name	Suitable	Timeframe	No. Dwellings
22	Grain Stores	Suitable	0-10years	197
106	Derwenthorpe*	Suitable	0-10years	540
115	Hungate*	Suitable	0-10years	720
276	Nestle South	Suitable	0-10Years	464
119	Germany Beck*	Suitable	0-15Years	700
13	British Sugar	Suitable	0-15years	1250
20	York Central	Suitable	0-15years+	1780
140	Terry's Factory	Suitable	6-15 years	412
15	Site to NE Nestle	Suitable	6-15 years	514

*These sites already have planning permission so are counted within the commitments (figure 18). They do therefore not appear in the SHLAA supply tables (figures 19-21)

Sites within the Planning Process

10.7 The 2008 Annual Monitoring Report (AMR) provides the following figures:

Figure 18: Sites already identified within the planning process

	New Developments on PDL (excluding Conversions & COU)	New Development on Greenfield Sites (Excluding Conversions and COU)	Conversions From Existing Dwellings	COU to Dwelling	Total on All Sites
Total Number of Net Dwellings with Outstanding Planning Permission at 31st March 2008	2845	1287	21	278	4431

Sites with Planning Permission

- 10.6 Allocated sites with planning permission currently provide a remaining capacity of 2972 dwellings. Of these 1732 are on brownfield sites (58%) and 1,240 are on greenfield sites (42%). Sites that are unallocated but have extant planning consents provide a total remaining capacity of 1459 dwellings. Of these 1,396 are on brownfield sites (96%) and 63 on greenfield sites (4%).
- 10.7 These above figures reflect the consented capacities of sites. A discount of 5% has been applied to sites with planning permission (including allocations with permission). This is based on an analysis of non-implementation rates of past permissions to 2007. Future analysis of building rates will need to be carried out (through the AMR) to monitor any fluctuations that may be experienced and should changes occur the discount rate will be revised in future SHLAA Reviews.

Sites with deliverability or developable potential

- 10.8 Total number of dwellings without formal planning status but with deliverability or developable potential is 6,866 dwellings over 56 sites. These are sites that are deliverable or developable within the 5-year time frames assessed - 0-5 years, 6-10 years, 11-15 years and 15+ years. The suitability, availability and achievability of these sites have been assessed through the SHLAA process. For sites identified within the 0-5 years timeframe the process of site identification is compliant with paragraph 54 of PPS3 (stating there should be a reasonable prospect that housing will be delivered on the site within 5 years) as it identifies those sites where planning permissions are pending, usually signalling on-going negotiations between development control and the applicant, or those sites owner or controlled by developers or corporate bodies e.g. housing trusts or council who have signalled an intention to progress sites.
- 10.9 The following series of tables break each five-year block period into component parts to illustrate how the different categories of site contribute to the total dwelling availability. The individual site profomas for each site in the 0-5, 6-10, 11-15 and 15+ year category can be found in Appendix 8 to 11 respectively.

Figure 19: 0-5 Year Period

Site No	Site Name	No. Dwellings
	ALLOCATIONS (WITHOUT PERMISSION)	
3	15-a-c Haxby Road	23
125	Reynard's Garage	12
129	10-18 Hull Road	48
	TOTAL ALLOCATIONS WITHOUT PERMISSION	83
	SITES WITH DELIVERABILITY POTENTIAL (SHLAA SITES)	
15	Former Bio-Rad Premises, Haxby Rd	136
54	Land at Frederick House, Fulford	36
70	Park Avenue, New Earswick	2
91	Land at Cherry Lane	42
108	Heworth Family Centre	16
110	Land at Marygate	37
111	Askham Bar Park and Ride Car Park	60
150	Manor School	141
151	Lowfield School	183
194	Discus Bungalows	12
195	Discus Bungalows	58
196	Discus Bungalows	85
195	Former Citroen Garage, Lawrence Street	37
223	The Tannery, Sheriff Hutton Road, Strensall	53
231	Shipton Street Primary School	23
22	The Grainstores, Water Lane (0-5 year phase)	98
276	Nestle South (0-5 year phase)	232
13	British Sugar (0-5 year phase)	210
20	York Central (0-5 year phase)	210
	TOTAL SHLAA SITES	1671
	TOTAL ALL SITES	1754

Figure 20: 6-10 Year Period

Site No	Site Name	No. Dwellings
	ALLOCATIONS (WITHOUT PERMISSION)	
116	Castle Piccadilly	20
117	Area North of Trinity Lane	31
121	Burnholme WMC, Burnholme Drive	20
124	Monk Bar Garage	8
	TOTAL ALLOCATIONS WITHOUT PERMISSION	79
	SITES WITH DELIVERABILITY POTENTIAL (SHLAA SITES)	
22	The Grain Stores, Water Lane (6-10 year phase)	99
276	Nestle South (6-10 year phase)	232
13	British Sugar (6-10 year phase)	635
20	York Central (6-10 year phase)	635
15	Site to the North East of Nestle (6-10 year phase)	257
62	The Grange, Huntington	97
89	Land at Mill Mount	33
93	Rear of 62 Mill Lane, Wigginton	10
101	Land at Blairgowerie House, Main Street	37
112	Monks Cross Stadium, Kathryn Avenue	150
135	Council Depot, Beckfield Lane, Acomb	18
140	Terry's Factory (6-10 year phase)	206
148	Park off Balfour Street, Leeman Road area.	19
152	St Barnabas CE Primary School, Bright Street	5
156	1 - 9 St Leonard's Place	32
159	Land west of Haxby Road	96
197	North Lane	25
219	22 Princess Road	12
225	Land adj The Bracks / Green Lane	120
231	Land at Bootham Crescent	79
278	Site off Water lane, Clifton	18
309	Yearsley Bridge Centre	61
	TOTAL SHLAA SITES	2,876
	TOTAL ALL SITES	2,955

Figure 21: 11-15 Year Period

Site No	Name	No. Dwellings
	SITES WITH DELIVERABILITY POTENTIAL (SHLAA SITES)	
15	Site to NE of Nestle (11-15 year phase)	257
140	Terry's Factory (11-15 year phase)	206
13	British Sugar (11-15 year phase)	405
20	York Central (11-15 year phase)	800
29	Millfield Industrial Estate, Wheldrake	41
	TOTAL ALL SITES	1,709

Figure 22: 15+ Year Period

Site No	Name	No. Dwellings
	ALLOCATIONS (WITHOUT PERMISSION)	
118	Peel St/ Margaret St	30
	TOTAL ALLOCATIONS (WITHOUT PERMISSION)	30
	SITES WITH DELIVERABILITY POTENTIAL (SHLAA SITES)	
20	York Central (15 year+ phase)	135
18	Heslington Village and Common Lane	283
	TOTAL SITES WITH DELIVERABILITY POTENTIAL	418
	TOTAL ALL SITES	448

Unknown Sites

10.10 27 sites have been placed into the 'unknown' category. These sites have been assessed as potentially suitable for housing but through the availability assessment there has been insufficient information to make a judgment as to when or whether the site is likely to come forward for development. These sites have not been included within the housing supply as there is not enough information at this point in time to make an assessment of their deliverability.

10.11 If, following this consultation of the Draft SHLAA Phase 2 Report, further information is submitted by landowners or developers to support the availability of sites then the sites position within the supply years will be reconsidered. Completed site proformas for these sites can be found in appendix 12.

Figure 23: Sites in the 'Unknown' category

Site No	Name	Availability category	Greenfield / Brownfield / Mixed	No. Dwellings
11	Hudson House and Old Station Buildings, Toft Green	Unknown	BF	136
39	York Business Park Site 6a	Unknown	BF	52
55	Holgate Park Carriage Works	Unknown	BF	426
55	Holgate Park	Unknown	BF	161
123	MOD Land Fulford	unknown	GF	78
137	York Business Park, Nether Poppleton	Unknown	Mix	177
138	Annamine Nurseries	Unknown	GF	39
157	Parkside Commercial Centre, Terry Avenue	Unknown	BF	26
164	Land at York RI Rugby Ground	Unknown	GF	277

171	York Business Park, Nether Poppleton	Unknown	Mix	198
175	Car park, High Newbiggin Street	Unknown	BF	28
208	Land adj. 26 & 38 Church Lane	Unknown	GF	13
211	Land adj. 131 Long Ridge Lane	Unknown	GF	6
215	Land R/O surgery & 2a/2b Petercroft Lane	Unknown	BF	7
227	Builders Yard, Church Lane	Unknown	BF	10
241	Carpark off Bishopthorpe Road	Unknown	BF	12
244	Land at Brear Close	Unknown	GF	19
247	Adj Racing stables, Tadcaster Rd	Unknown	BF	30
248	Land RO 190-178 Hull Road	Unknown	GF	20
257	Land Ro Electricity Sub Station, Haxby Rd	Unknown	BF	49
258	Car parks at Nuffield Hospital	Unknown	BF	30
259	Land at end of Pinsent Court (off Redgrove Close)	Unknown	GF	21
267	Marygate Car Park, access from Hetherton's Street	Unknown	BF	60
272	Elm Tree Garage Car Park	Unknown	BF	16
275	Land on Tribune Way, off Clifton Moor Gate	Unknown	GF	15
277	Land around Burdike, between Sutton Way & Lilbourne Drive	Unknown	GF	22
279	South of Murton Industrial Estate	Unknown	GF	10
	Total			1,938

Sites within the Draft Greenbelt

- 10.12 42 sites have been placed into the 'sites within the draft green belt category'. These sites have been assessed as part of the SHLAA as they have been submitted as part of the Call for Sites Exercise but they are located within the Draft Green Belt and would therefore only come forward in line with the emerging Core Strategy and following a detailed evaluation of the Green Belt value. It is the role of the LDF Core Strategy to determine the approach to York's Green Belt including both its role and lifespan. The LDF will create a permanent green belt for York that preserves its special character and setting, whilst ensuring sustainable development; and that the green belt boundaries once set will endure until at least 2030.
- 10.13 As the Core Strategy is still emerging the Green Belt Boundaries for York are as yet not set. For the purposes of the SHLAA sites that fall within the areas of land identified as being important in preserving the City's historic Character and Setting, as identified in the 'Approach to The Green Belt Appraisal' (2003), have been excluded from further assessment as detailed in Criterion 1.
- 10.14 All sites falling within the other areas of the Draft York Greenbelt that are potentially suitable for housing have been grouped together in terms of their availability. The sites may need to be assessed further for their

suitability as part of the Allocations DPD where detailed green belt boundaries will be set. Full site proformas can be found in appendix 13.

Figure 24: Sites in the draft Green Belt Category

Site ID	Site Name	Availability Category	Source of Site	No. Dwellings
1	Adjacent Middlewood Close	Draft GB	Call for Sites	24
7	Land at Cranbrooks, North of North Lane, Wheldrake	Draft GB	Call for Sites/Alternative Site at Changes 3	72
12	Fields 6854 & 7047, Wheldrake	Draft GB	Call for Sites	327
14	The Forge Cockey Hill	Draft GB	Call for Sites	13
16	Land South of Moor Lane Woodthorpe	Draft GB	Call for Sites/Alternative Site at Changes 3	550
17	Pond Fields	Draft GB	Call for Sites/Alternative Site at Changes 3	188
19	Thornfield Lane and Land to the East of New Lane	Draft GB	Call for Sites/Alternative Site at Changes 3	771
21a	Land to the North of Monks Cross	Draft GB	Call for Sites	301
21b	Land to the North of Monks Cross	Draft GB	Call for Sites/Alternative Site at Changes 3	888
21c	Land to the North of Monks Cross	Draft GB	Call for Sites/Alternative Site at Changes 3	2207
26	Eastfield Lane, Dunnington	Draft GB	Call for Sites	56
27	Between Scarborough Railway and Southlands Road	Draft GB	Call for Sites/Alternative Site at Changes 3	137
29	Land to the East of Millfield Industrial Estate	Draft GB	Call for Sites	70
31a	Ten Thorne Lane	Draft GB	Call for Sites/Alternative Site at Changes 3	26
31b	Land to the West of Knapton	Draft GB	Call for Sites	617
31c	North of Knapton	Draft GB	Call for Sites	1938
36	North of Church Lane and Spring Hill Farm	Draft GB	Call for Sites/Alternative Site at Changes 3	72
37a	Land East of New Lane, Huntington	Draft GB	Call for Sites/Alternative Site at Changes 3	38
37b	Land Between New Lane and Malton Road	Draft GB	Call for Sites/Alternative Site at Changes 3	77
38	Land between Moor Lane and Usher Lane	Draft GB	Call for Sites/Alternative Site at Changes 3	729
45	Land at Church Balk/Eastfield Lane Dunnington	Draft GB	Call for Sites/Alternative Site at Changes 3	63
53	Land to the Rear of Westfield School	Draft GB	Call for Sites	82
60	Usher Park	Draft GB	Call for Sites	52
68	Land at Dauby Lane Elvington	Draft GB	Call for Sites	108
69	Land at Stockton Lane	Draft GB	Call for Sites	58
71	Land off Flaxton Road (to South of the Railway Line)	Draft GB	Call for Sites	137
72	Land at Moor Lane, Copmanthorpe	Draft GB	Call for Sites	116
81	Land between York Road and old DVLR line	Draft GB	Call for Sites	22
82	Rufforth Airfield – South of	Draft GB	Call for Sites	100

	Southfield Close			
84	South of Moor Lane	Draft GB	Call for Sites	64
88	Land Adjacent to the designer Outlet	Draft GB	Call for Sites	685
102	Land at Graystones, Lords Moor Lane	Draft GB	Call for Sites	91
104	Land at the Wilberforce Home, Tadcaster Road	Draft GB	Call for Sites	75
106	Land to the East of Metcalf Lane	Draft GB	Call for Sites/Alternative Site at Changes 3	527
109	Land at Norway Drive	Draft GB	Call for Sites	36
162	Church Lane, Elvington	Draft GB	Alternative Sites at Changes 3	22
165	Land at the Mews, Strensall	Draft GB	Alternative Sites at Changes 3	24
170	Land at Pansy Field, West of Station Road, Upper Poppleton	Draft GB	Alternative Sites at Changes 3	70
280	Wheldrake Industrial Estate	Draft GB	Employment Land Review	39
Total			11,472	

REVIEW OF THE ASSESSMENT

- 11.1 This section of the report looks at the implications of the SHLAA findings against the current housing requirements set out in the Regional Spatial Strategy (RSS) for Yorkshire and the Humber. This involves an analysis of completion trends in previous years.
- 11.2 The current RSS housing requirement for York is 640 dwellings per annum from the period 1st April 2004 31st March 2008 and from 1st April 2008 to 31st March 2026, 850 new homes should be built each year.
- 11.3 Beyond the end date of the current RSS (2026), an annual rate of 850 homes per year has been projected forward until the end date of the plan (2030). This is to ensure that it can be guaranteed the City can meet its housing need without encroaching on proposed Green Belt Land.
- 11.4 The base date for the requirement starts from 1st April 2004 and runs to the 31st March 2030. The overall requirement for York from 1st April 2004 to 31st March 2030 is 21,260 dwellings over a period of 26 years.

Recent Completions

- 11.5 It is important to look at the performance of housing completions from 2004 to the present date (four year period).

Figure 25: Net completions in York 2004-2008

Year	Completions	New Build	Net Conversions	Net Change of Use	Demolitions	Net Dwelling Gain
2004-2005	1193	993	27	153	13	1160
2005-2006	949	784	11	128	17	906
2006-2007	875	734	18	92	46	798
2007-2008	557	442	19	68	6	523
2004-2008	3574	2953	75	441	82	3387

- 11.6 Figure 25 shows that since 2004 there have been 3387 net completions in York, with an annual average completion rate of 847 dwellings. Set against the RSS target of 640 dwellings per annum (2,560) it is clear that York has exceeded the proposed requirement in previous years.

Supply and Requirements

- 11.7 It is important to assess the housing requirements against the supply that has been identified either as previous completions, current commitments or as potential sites coming forward, in order to assess whether sufficient

supply can be broadly identified to meet the longer term housing requirements.

Figure 26: Housing Supply

Source of Supply	Number of Units
Net completions (2004-2008)	3,387
No. net dwellings with outstanding planning permission (incl. Allocations with permission) (discounted at 5%)	4,431
Potential Housing Sites in SHLAA (excluding unknown or draft green belt sites)	6,866
Total Identified Supply	14,684

11.8 Figure 26 illustrates that there is the potential to accommodate an additional 14,684 units between the period of 2004 to 2030 (of which 3,387 have already been provided). This compares with the RSS requirement over this period of 21,260 units. This means that there is a shortfall of 6,576 units to 2030.

Housing Trajectory

11.9 The SHLAA database also provides a more detailed assessment of the amount of housing that each site is expected to deliver each year, as set out in the housing trajectory (figure 27) and the cumulative supply graph (figure 28).

11.10 The SHLAA database also provides a more detailed assessment of the amount of housing that each site is expected to deliver each year, as set out in Table 6, the housing trajectory. The housing trajectory (Figure 27) is made up of the potential housing supply including net housing completions, existing planning consents on non-allocated sites, existing planning consents on allocated sites, SHLAA sites (including existing housing allocations without permission) and SHLAA sites with a Development Brief or emerging Area Action Plan. Table 7 shows the cumulative supply set against the RSS target. The cumulative supply graph (Figure 28) indicates that there is enough potential supply to meet the RSS housing target until the year 2021/22. In the year 2021/22 there is a potential undersupply of 484 dwellings against the RSS target of 850 dwellings per year.

11.11 Sites that are currently under construction or have an extant planning permission are much easier to make yearly completion assumptions on compared to sites that may become available towards the end of the plan period. The housing trajectory provides a good illustration of the expected annual completion rates over the plan period.

11.12 It is a key role of the LDF to ensure that sufficient land will be available to meet this need whilst also building in flexibility for any subsequent reviews of RSS or any successor plan and lower than expected rates of delivery on identified sites. The selection of future sites or areas for potential future development must conform to the Spatial Strategy which will be outlined in the emerging Core Strategy.

Figure 27: SHLAA Housing Trajectory

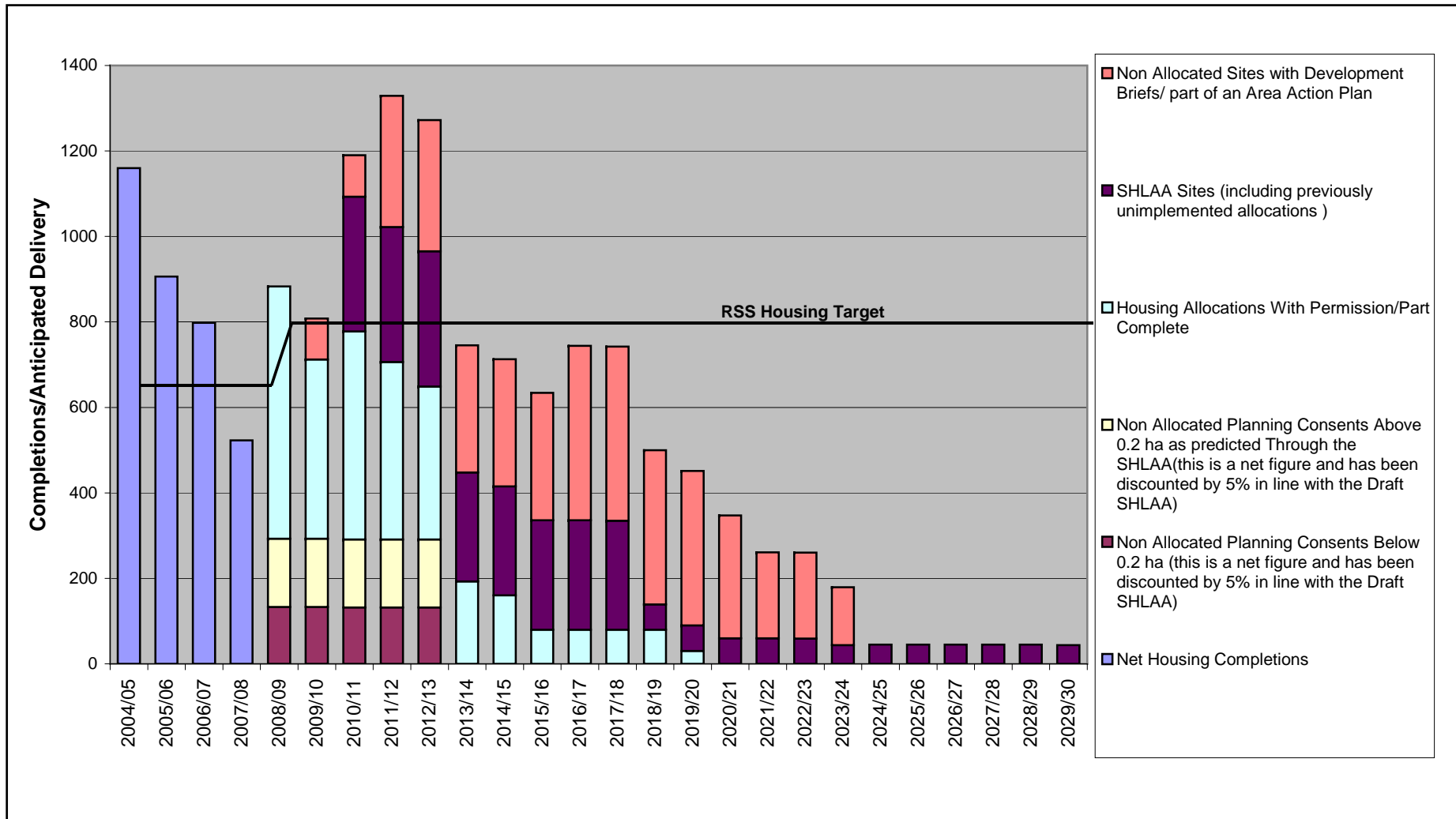
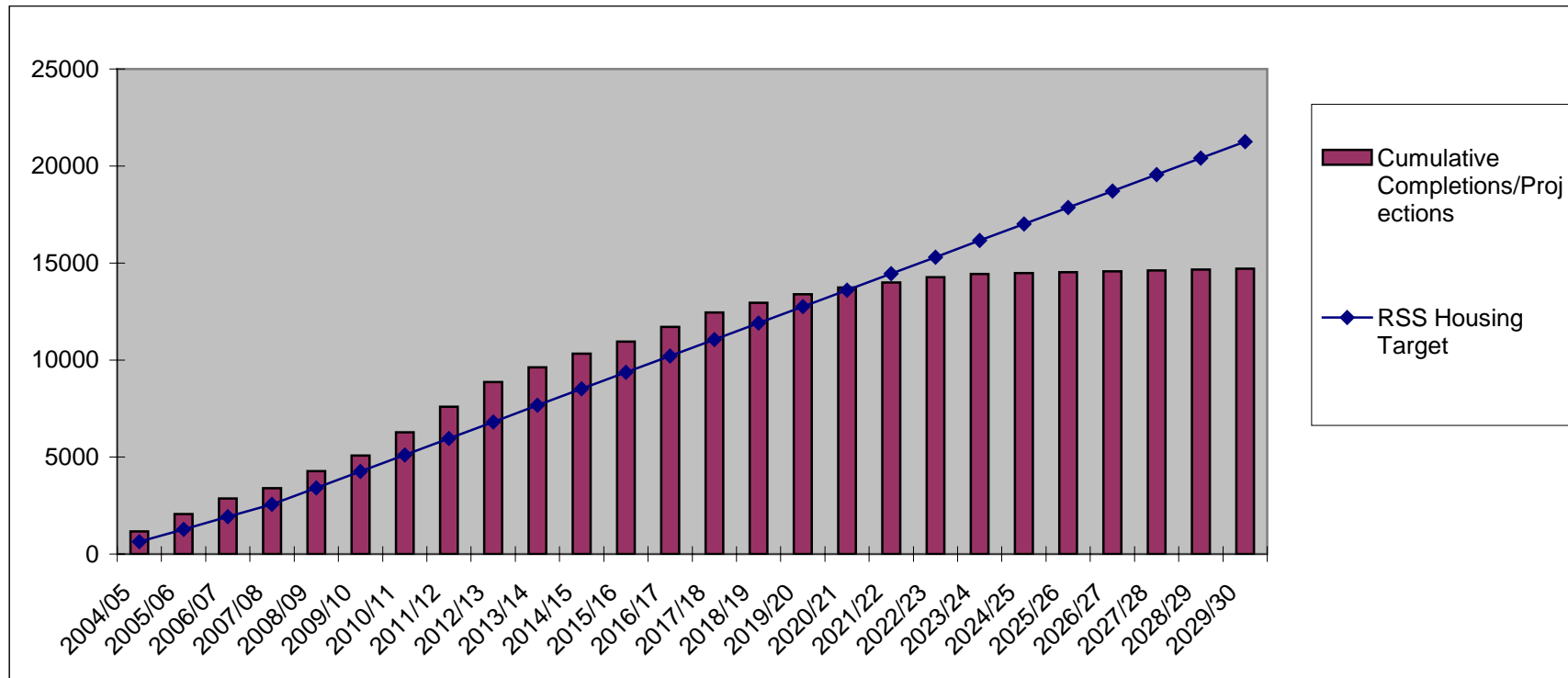


Figure 28: RSS Housing target compared to completions / projections



STAGES 9 & 10: Assessing the housing potential of broad locations and determining the housing potential of windfalls

- 12.1 The footnote on page 19 of PPS3²⁹ defines windfalls as “those which have not been specifically identified as available in the plan process. They comprise previously developed sites that have unexpectedly become available...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.”
- 12.2 Windfalls are a particular issue in Yorkshire & the Humber, with significant components of recent housing supply in West and South Yorkshire urban areas as well as key towns such as Harrogate and York coming forward as windfalls. For example, in 2006/2007, 81% of housing development across the region was completed on windfall sites. In York in the same period 58% of net completed sites was on windfall sites. This, in part, has been the result of previous national planning policy and the investor-led market for city centre apartments. Over the last ten years in York an average of 435 windfalls per annum have been completed.
- 12.3 The CLG guidance, PPS3 itself and other policy and advice make it clear that local authorities, in planning for housing land, should not plan for a set level of windfalls, except in the most exceptional of circumstances. A windfall allowance should therefore not be considered as a component of a Strategic Housing Land Availability Assessment. CLG has not categorically defined ‘exceptional circumstances’, but advice from the Planning Advisory Service considers that this might be thought of as an area which is almost entirely built-up to the district boundaries, within which there is no reasonable prospect of identifying at least a 15 year supply of housing land. Within the region, Hull is the only authority which comes close to this definition.
- 12.4 It is likely that windfalls will continue to come forward at a significant rate in many parts of the region. If this proves to be the case, then delivery of windfall sites will keep ‘pushing back’ the planned supply of housing land, so that land initially identified in the 10-15 year supply may not be required for housing until a later date. In effect, windfalls will ‘drop in’ near the front end of the conveyor pushing everything else back. To this effect, local authorities should still seek to understand past trends of windfall sites and the likelihood of future sites coming forward as windfalls to continue to inform the position at a regional level. This information is pertinent to the overall housing supply situation within the region and will continue to inform the regional evidence base and inform future RSS policy revision.
- 12.5 The purpose of the PPS3 approach is to ensure a forward supply of housing land is identified in the absence of windfalls. In delivering the Local

²⁹ Planning Policy Statement 3: Housing (CLG, 2006)

- Development Framework, in particular when developing Core Strategy and Site Allocations DPDs, Local Planning Authorities should use the ‘plan, monitor and manage’ approach to ensure a phased approach to the release of housing land according to the level of windfalls actually occurring.
- 12.6 In practice, this means that Local Planning Authorities may identify possible housing land in the Strategic Housing Land Availability Assessment and subsequently in site allocations which may not actually be required for housing for many years beyond the period anticipated if housing on windfall sites continues to be delivered in significant numbers in the Region.
- 12.7 Neither PPS3 nor the SHLAA guidance seek to fully answer when we can safely take account of windfalls, because it must depend on the particular circumstances of the individual authority. To be able to take account of windfalls an authority needs to first –
- Carry out a thorough and detailed SHLAA study which identifies as many sites as practicable
 - Review the results to see how much supply has been identified; and
 - Consider broad locations for proactive policy within settlements, and for urban extensions where there is potential for them – very few authorities have such tight boundaries that there are no possible urban extensions to consider, albeit that this may involve possible changes to green belt boundaries or other high level policy constraints.
- 12.8 Only when these stages have been completed can an authority begin to consider whether it can produce robust evidence ‘of genuine local circumstances that prevent specific sites being identified’.
- 12.9 In the past York’s housing supply has included a high number of windfalls (housing delivered on sites not identified in any development plan). As far as possible those sites with windfall potential have been identified and assessed through the SHLAA process and it has identified most available sites for the short and medium term. However, given the timescale of the LDF (to 2030) there are likely to be sites that fit with the Spatial Strategy that will become available particularly towards the latter end of the plan. Based on previous rates it is estimated that this source could provide around 2,175 homes between 2025/26 and 2030 (based on 435 units per annum).
- 12.10 The emerging Core Strategy will need to plan how any shortfall in sites should best be planned for. Broad locations are areas where housing development is considered feasible and will be encouraged but where specific sites cannot yet be identified.
- 12.11 The advantage of broad locations is that the community will be clearer about where future development will be directed and there will be greater

certainty to developers about where development may be encouraged. It is a proactive approach to planning, which reflects positive choices about the direction of future housing growth, rather than a reactive approach to development opportunities as they arise.

- 12.12 The SHLAA has already assessed a number of large sites located within and adjoining settlements where housing development could be suitable if sufficient land was provided for other uses such as shops, schools and open space. These sites are mainly located within the existing green belt and as such have not been included in the housing supply at this stage. The sites as detailed in appendix 12 are not considered as available for the purposes of the SHLAA as they would need to come forward if required as part of the emerging Core Strategy and following a detailed review of the green belt value and further detailed site by site analysis of their suitability. The SHLAA gives an indication of their potential suitability which could be used as a starting point for further assessment.

CONCLUSION

- 13.1 This SHLAA Draft Consultation Report provides a snapshot picture of both the committed and potential supply in York up to 2030, with a base date of 1st April 2008. The results of the SHLAA will be used to help inform work on the Local Development Framework, including both the Core Strategy and Allocations DPD.
- 13.2 It has been carried out in accordance with the CLG guidance and Regional Practice Guidance on SHLAA and the Council has sought to engage with appropriate stakeholders at various stages of the process, including consulting on the draft methodology, a 'call for sites' exercise and further consultation with stakeholders regarding the suitability, availability and achievability of sites. This draft consultation report presents a further opportunity for consultation with stakeholders. There will be further opportunities as the SHLAA develops and is reviewed through the Annual Monitoring Report (AMR) process for stakeholders to continue to be involved, for example providing additional information on sites or suggesting new sites as they become available.
- 13.3 The sites that have been identified in the SHLAA database are derived from a number of sources including the Call for Sites Exercise. It is important to note that certain assumptions have been made within the assessment based on the CLG guidance and on officers professional judgement at a certain point in time. The SHLAA should be treated as a 'living' document and the information will be subject to change over short periods of time, as sites move from one time period to another for example.
- 13.4 Consequently, planning applications for residential development will continue to be assessed on their individual planning merits in accordance

with the development plan and other material planning considerations. Information that is contained in the SHLAA may act as a useful indication of opportunities or constraints on a site but applicants will still need to undertake their own detailed research to determine the full potential for residential development opportunities on sites within the SHLAA or indeed those that have not been identified.