

Report of the Director of City Strategy

Consultation Draft Strategic Housing Land Availability Assessment (SHLAA) Phase 2 – Evidence Base

Summary

1. This report advises Member's of the preparation of the Consultation Draft Strategic Housing Land Availability Assessment (SHLAA) Phase 2 produced as a key part of the evidence base to support our Local Development Framework. The study builds on the stage 1 SHLAA reported to Members in 2008.
2. Members are asked to approve the study, attached as Annex A, to this report for publication as a consultation draft which will form part of the LDF evidence base. The technical appendices to the main report (Appendices 1- 14) are too large to attach to the agenda. Three printed copies have been placed in the Member Library along with two copies in the Guildhall Reception. The appendices are also published on the Council's website with the agenda documents. Printed copies will be made available to Members of the LDWG at individual member request.
3. 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. Following Members consideration of the SHLAA further work will be undertaken to consider its conclusions in light of our overall planning strategy and strategic approach to housing development. This will include the consideration of the sites in light of the approach to development we are establishing as part of the LDF Core Strategy and other relevant site-specific information.

Background

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

¹ Planning Policy Statement 3: Housing (CLG, 2006)

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 (RSS). 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.

5. The SHLAA will be one of a number of reports that will provide baseline evidence to be used by the Council in the preparation of the Local Development Framework (LDF). The assessment itself does not represent Council policy; it is for the Core Strategy and Allocations DPD to decide which sites are suitable and deliverable and which should come 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. 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. Members are therefore **not** being asked to approve these sites as housing allocations. The sites to be allocated for housing will be a decision to be taken later as part of the Core Strategy, Allocations DPD and Area Action Plans.
6. The Regional Spatial Strategy for Yorkshire and the Humber (RSS) adopted in May 2008 sets out the required levels of growth in terms of future housing provision for York. It indicates that 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. 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 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.
7. 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.
8. The Strategic Housing Land Availability Assessments Practice Guidance² (referred to as the Guidance for the remainder of the report) details the requirements of Local Authorities to:

8. ² Strategic Housing Land Availability Assessments: Practice Guidance (CLG 2007).

- 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 years 11-15;
- Where it is not possible to identify specific sites for years 15 onwards of the plan, indicate broad locations for future growth; and
- Not include an allowance for windfalls in the first 10 years of the plan.

Further information on windfalls can be found in paragraph 63 of this report.

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 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.

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

Options

8. Members have two options relating to the Strategic Housing Land Availability Assessment (SHLAA):

Option 1: To approve the SHLAA, attached as Annex A, for further consultation with stakeholders and as part of the Local Development Framework evidence base;

Option 2: To seek amendments to the SHLAA through recommendations of the LDF Working Group, or request further work from officers.

Analysis of Options

9. The Study forms an important part of the evidence base for the LDF. It will be part of the evidence used to guide the policy issues regarding housing land provision in the City. Given the significance of this study it is important that it is approved as part of the evidence base to support the progress of the Local Development Framework, both at the Core Strategy Preferred Option stage and also within subsequent detailed policy documents.

10. Delaying the approval of the study could delay the Core Strategy and there would be a significant risk that this would delay further stages of the LDF, since the Core Strategy will provide the overall planning policy framework to inform the other Development Plan Documents.
11. Members are therefore asked to approve the Draft SHLAA as part of the evidence base for the Local Development Framework. It is important to note that in adopting this report Members are not being asked to endorse any particular sites or a particular policy approach. Instead, we are asking members to agree that the information provided will be used to inform our consideration of potential approaches for the Core Strategy and other LDF documents.

Key Findings from the Study

12. The study provides the following information:
 - An assessment of all sources of supply;
 - An estimate of the housing potential of each site;
 - An assessment of when and whether sites are likely to be developed; and
 - An analysis of future potential housing supply.

An Assessment of all Sources of Supply

12. 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. The following sources relate to the position at the 1st April 2008:

- Sites with existing permission @31.3.08
- Existing Local Plan Housing Allocations
- Sites with existing Development Briefs or emerging AAP
- Sites allocated (or with planning permission) for employment which are no longer required for that use

In addition the following sources of potential supply were used:

- National Land Use Database
- Allocations DPD 'Call for Sites' Exercise (March-May 2008)
- Draft Employment Land Review (ELR)
- Desk top mapping survey
- Sites put forward by CYC officers (Property Services and Community services)
- Alternative housing sites suggested at Local Plan Changes 3 & 4
- Sites suggested at the 2006 Housing Inquiry for Germany Beck and Derwenthorpe.

13. The 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. The SHLAA includes all sites put forward for residential development through the Call for Sites in the assessment in addition to those identified through other sources. As determined in SHLAA Phase 1 a site threshold of 0.2 hectares has been used. In total 226 sites were assessed as part of the SHLAA. Further details on the sources of sites and the Call for Sites exercise can be found in sections 2, 3 and 4 of the main report (Annex A) from page 11 to 16.

14. The assessment includes all sites identified within the City of York boundary and therefore includes brownfield and Greenfield sites including some that are within the current York Green Belt. 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 for the Core Strategy and Allocations DPD. The green belt status of sites has been included in the assessment criteria as recommended in the Regional Practice Guidance³. The guidance states that “*sufficient sites outside existing settlement limit 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*”.
15. The purpose of the SHLAA in relation to the Core Strategy is to provide evidence that sufficient housing land can potentially be provided within the locations indicated by the spatial strategy. Without such evidence it would be difficult to fully demonstrate the deliverability of the strategy. However, in light of the revised PPS12, if an Allocations DPD is to be prepared, as it is in York, 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 sites. 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. The Spatial Strategy for York, which will be set by the emerging Core Strategy, will underpin the distribution of future development.
16. The SHLAA is a technical exercise, which forms one part of the overall 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 green field and green belt sites within the assessment does not pre-judge the strategic approach to the location of future development that will be set through the Core Strategy and which Members will be asked to consider starting when we present them with Preferred Options for the Core Strategy.

³ Understanding Yorkshire and Humber’s Strategic Housing Land Availability: Regional Practice Guidance, April 2008.

An estimate of the housing potential of each site

17. 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. The approach to estimating the housing potential of sites assessed through the SHLAA has been based on the emerging approach of the Core Strategy, which is evidenced, from key documents such as the City of York Strategic Housing Market Assessment (SHMA).
18. For the purposes of the SHLAA the City of York has been split into zones which best reflect the characteristics of the areas. These zones are based on the assessment of housing market sub areas undertaken as part of the SHMA. Map 1 in Appendix 2 to the main report (Annex A) shows the zones. The zones are:
- **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).
19. A calculation has then been made for each site to calculate the net area of the site to which the calculation of housing yield should be applied. Following comments from Members on the density calculations used in the SHLAA Phase 1 report regarding the importance of the provision of on-site facilities such as open space, transport infrastructure and community facilities, the total gross site area has been 'netted off' using a gross to net site ratio to provide a net site area to which the density calculation has been applied. Figure 1 shows an example of the housing potential proforma, which has been completed for each site.

Figure 1: Housing Potential Section of the assessment proforma

Estimated Housing Capacity					
Gross site area		3.76			
Net site area		Gross to net ratio: 0 - 0.4 ha = 100% 0.41 - 5 ha = 80% Over 5 ha = 70%		3.01	
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 checked="" 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			141		
Housing Type and Mix:			Private dwellings	Affordable dwellings	Total
No of houses	Total		70	71	141
	Semi-detached / Townhouses		32	32	64
	Detached		17	18	35
No of Flats			21	21	42

20. 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. In brief for sites below 0.4 hectares 100% of the site area is used, as these sites would tend to be small infill sites located in areas with access to existing open space and other community facilities and would tend to provide off-site contributions. For sites between 0.41 and 5 hectares it has been assumed that 20% of the gross site area would be needed for on site provision of open space, transport infrastructure and community facilities and for large sites above 5 hectares 30% of the gross sites area has been excluded. Further details on the calculations and examples of schemes on which the percentages have been based can be found in section 6 of the main report (Annex A).

21. Once the net site area has been established a proposed density figure has been applied to the site based on the zone, which the site falls within. To establish appropriate housing densities for each zone the SHMA has been used and background work undertaken for the emerging Core Strategy. Based on the overall aim of providing 70% houses and 30% flats across the York area a density has been calculated for each zone. The density for the houses (70%) has been based on the emerging Core Strategy work and background work on density and good design standards undertaken as part of SHLAA Phase 1. The density figures for the houses range from a minimum of 30 dwellings per hectare (dph) in the rural zone (based on the minimum PPS3 density) to 40 dph in the suburban zone (based on schemes such as Germany Beck and Derwenthorpe) and 75dph in the city centre (based on schemes such as Bedern, behind Goodramgate). For flats (30%) the density standards have been based on past trends in each of the zones and range from 80dph in suburban areas to 200 dph in the city centre. Rural areas have been calculated at 100% houses. Further examples are given in section 6 of the main report (Annex A).

22. Using these densities for house and flats a proposed 'composite' density standard has been calculated which is based on 70% houses at the appropriate density for the zone and 30% flats. The calculations are explained in detail in the main report (Section 6). The density standards used are: City Centre – 92.59dph; city centre extension zone – 84.74 dph; urban area – 58.82 dph; suburban area – 47.05 dph and rural area – 30dph.
23. 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 0.03ha/2dwellings 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. 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.
24. 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 a guide as to what level of affordable housing may be achievable through identified sites. The figures represent the optimum current policy level of 50% affordable housing.

An assessment of when and whether sites are likely to be developed

25. 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.

Assessing Site Suitability

26. In terms of assessing the suitability of sites for housing development each site has been assessed against a number of criteria. 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. A simple traffic light system then colour codes the assessment for each suitability criterion, balancing all considerations. Details of the traffic light system and full details of all the

criterion that were assessed as part of the suitability assessment can be found in Section 7a of the main SHLAA report (Annex A).

27. As part of the suitability assessment the first stage of analysis came from 'sieving out' immovable environmental constraints or protective designations on the land covered. Three primary constraints were assessed: flood risk (sites falling within functional flood plain, zone 3b); statutory and non-statutory environmental designations and land preserving the historic character and setting of York from the 2003 Green Belt Review. For the SHLAA, all sites falling within these important areas have been excluded from further assessment, as they are not considered to be suitable for housing development. Figure 11 in the main report lists the sites, which fall within a primary constraint area, and Appendix 5 to the main report (Annex A) includes a map showing all the sites, which fall, within a primary constraint area. In total 49 sites were removed at this stage.

28. The remainder of the sites were then assessed against the other suitability criteria, which include location suitability; transport and accessibility, geo-environmental designations and strategic policies. In total 52 sites were removed from the SHLAA as being unsuitable. Figure 12 in the main report lists the sites removed as being 'unsuitable' and Appendix 6 to the main report includes full site proformas and maps for these sites. Full details of the criteria used are included in section 7a of the main report.

Assessing site availability

29. 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. 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.

Assessing site achievability

30. 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. According to the guidance, the achievability of

each site will depend on a combination of market factors, cost factors and delivery factors.

31. 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.
32. 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.
33. The overall financial appraisal is calculated using the estimated total scheme value and the estimated 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 based on the SHLAA methodology. Details of the methodology for the viability assessment can be found in section 7c of the main report (paragraph x to x).

An analysis of future potential housing supply

34. Out of a total of 226 sites assessed initially, 49 were removed due to the assessment deeming them unsuitable due to failing one or more of the primary constraints (see Appendix 5 to the main report).
35. A further 52 sites were removed due to the assessment deeming them unsuitable (see Appendix 6 to the main report).
36. 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 to make a judgement about when or whether these sites may come forward for development. Completed proformas for these sites can be found in Appendix 12 to the main report (Annex A).
37. 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 to the main report (Annex A).

38. 56 sites were considered deliverable and/or developable and placed within estimated five-year blocks of delivery. These 58 sites could theoretically provide 6,866 dwellings. Completed proformas for these sites can be found in Appendices 8 to 11 of the main report (Annex A)

Table 1: 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

*For the purposes of the SHLAA the start date of the supply has been taken to be 1st April 2008, which is the date of the SHLAA assessment. The start date of supply for the Core Strategy will be five years from the date of adoption i.e. 2010.

39. The housing potential of the 56 deliverable/developable sites was calculated and the estimated number of dwellings has been distributed across individual years to predict when dwellings are likely to 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. Table 2 identifies the 9 sites where a site is included in multiple 5yr periods due to phasing the construction of dwellings on the site.

Table 2: 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 with existing planning permission

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

Table 3: Sites already identified within the planning process

	New Developments on Brownfield Land (excluding Conversions & COU)	New Development on Greenfield Land (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

40. 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%).
41. The 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

42. 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 owned or controlled by developers or corporate bodies e.g. housing trusts or council who have signalled an intention to progress sites.

43. Figures 19-22 in the main report list the sites in each timeframe. The completed proformas for these sites can be found in appendices 8-11 of the main report (Annex A).

Unknown/Unavailable sites

44. 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. The estimated total potential supply of these sites is 1938 dwellings. Of these 1,043 potential units are on Brownfield land (54%), 520 units are on Greenfield land (27%) and 375 units are on mixed Brownfield / Greenfield sites (19%).

45. 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.

46. Details of these sites and the completed proformas can be found in appendix 12 to the main report (Annex A).

Sites within the draft Green Belt

47. 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.

48. 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.

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. These sites are detailed in Appendix 5 to the main report (Annex A).

50. All sites falling within the other areas of the Draft York Green Belt have been grouped together in terms of their availability. Members will make any decision on their suitability for development as part of the LDF Core Strategy.

51. Details of these sites and the completed proformas can be found in appendix 13 to the main report (Annex A).

Review of the Assessment

52. 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.

53. 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.

54. 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.

55. 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

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

Table 4: Net completions in York 2004-2008

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

57. Table 4 shows that since 2004 there have been 3,387 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) from 2004 to 2008 it is clear that York has exceeded the proposed requirement for these years.

Supply and Requirements

58. 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.

Table 5: Housing Supply 2004-2030

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

59. Table 5 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.
60. 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 (Table 6) 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 (Table 7) 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.
61. 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.
62. 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.

Table 6: SHLAA Housing Trajectory

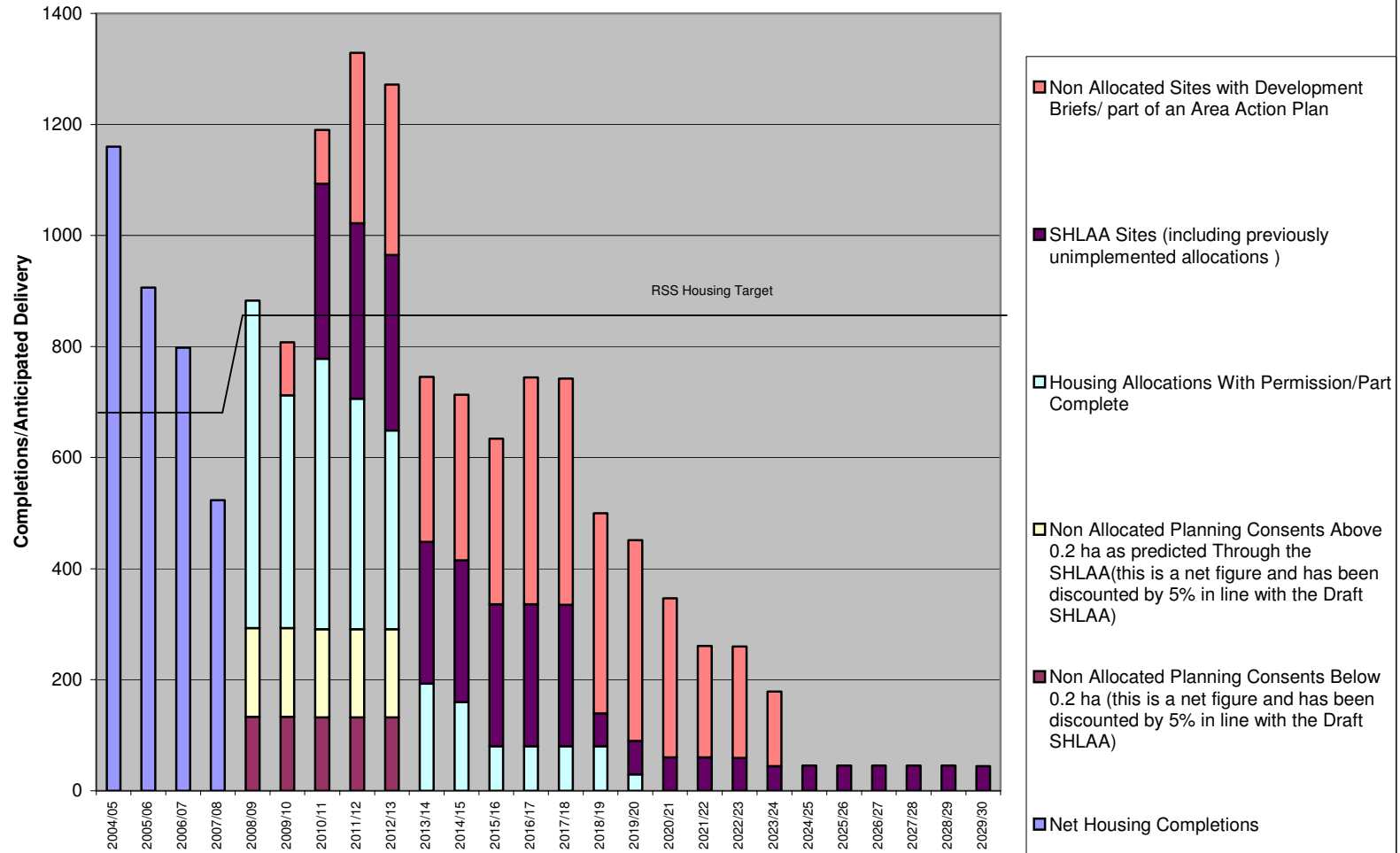
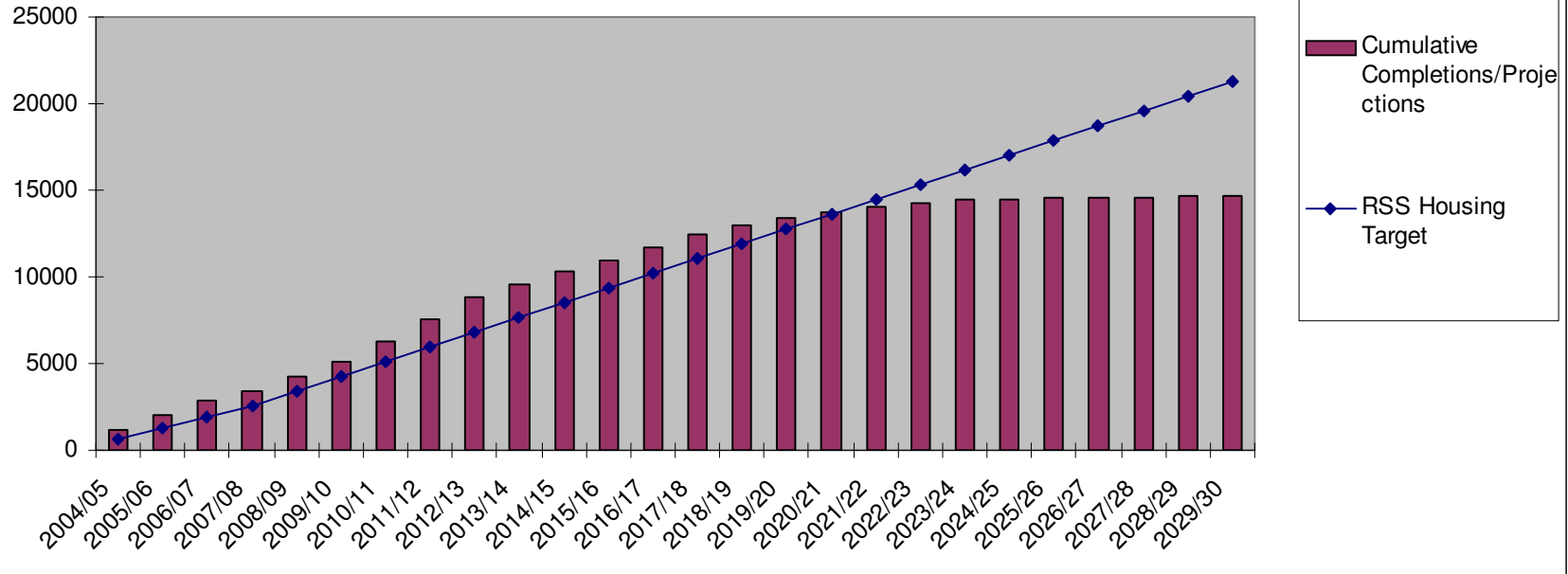


Table 7: RSS Housing Target Compared to Completions/Projections



Planning for the shortfall – assessing the potential of broad locations and/or windfalls

63. 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.
64. It is likely that windfalls will continue to come forward at a significant rate in many parts of the region. 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.
65. If this continues 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.
66. The purpose of the PPS3 approach is to ensure a forward supply of housing land is identified in the absence of windfalls coming forward. In delivering the Local 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. 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. Allowances for windfalls **should not** be included in the first 10 years of land supply unless Local Planning Authorities can provide robust

evidence of genuine local circumstances that prevent specific sites being identified.

67. 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.

68. 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’.

69. 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. The emerging Core Strategy will need to plan how the 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.

70. 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.

71. 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 to the main report (Annex A) 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.

Conclusions

72. 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.
73. 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.
74. 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 officer's 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.
75. 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.

Next Steps

76. Following Members consideration of the SHLAA further work will be undertaken to consider its conclusions in light of our overall planning strategy and strategic

approach to housing development. This will include the consideration of the sites in light of the approach to development we are establishing as part of the LDF Core Strategy and other relevant site-specific information.

77. This consultation draft, if approved by Members, will then be sent out to all stakeholders who took part in the previous SHLAA consultation, which includes landowners, agents, developers and statutory organisations. In addition the report will be placed on the Council website. Following consideration of comments received the final SHLAA Phase 2 report will be brought back to members of the LDFWG.

78. The outcomes of the further work on sites will be reported to Members later this year as a part of the development of the Allocations DPD and City Centre AAP.

Corporate Priorities

79. The option outlined above accords with the following Corporate Strategy Priorities:

- Improve the quality and availability of decent affordable homes in the city

Implications

80. The following implications have been assessed.

- **Financial** – *None*.
- **Human Resources (HR)** – *None*.
- **Equalities** - *None*
- **Legal** - *None*
- **Crime and Disorder** - *None*
- **Information Technology (IT)** - *None*
- **Property** - *None*
- **Other** – *None*

Risk Management

81. There are no identified risks in this proposal

Recommendations

That Members:

(i) Approve, subject to the recommendations of this Working Group, the proposed consultation draft Strategic Housing Land Availability Assessment, included as Annex A to this report, for publication as part of the Local Development Framework evidence base.

Reason: So that the Strategic Housing Land Availability Assessment can be used as part of the Local Development Framework evidence base.

(ii) Delegate to the Director of City Strategy, in consultation with the Executive Member for City Strategy, the making of any other necessary changes arising from the recommendation of the LDF Working Group, prior to its publication as part of the Local Development Framework evidence base.

Reason: So that any recommended changes can be incorporated into the Strategic Housing Land Availability Assessment.

Contact Details

Author:

Rachel Macefield
Principal Development Officer
City Development
Tel: 01904 551356

Chief Officer Responsible for the report:

Damon Copperthwaite
Assistant Director of City Strategy
Tel: 551448

Report
Approved



Date 26/02/2009

Specialist Implications Officer(s)

N/A

Wards Affected: *List wards or tick box to indicate all*

All

For further information please contact the author of the report

Background Papers:

None

Annex A: Draft Strategic Housing Land Availability Assessment

(The appendices to Annex A have not been included in the printed agenda due to their size but are available with the online agenda on the Council's website.)