

**East Riding of Yorkshire Council**

**Strategic Housing Land Availability Assessment**

**March 2009**

## Executive Summary

The Strategic Housing Availability Assessment (SHLAA) forms part of the evidence base for the East Riding of Yorkshire's Local Development Framework (LDF). It will have particular relevance to the Core Strategy Development Plan Document (DPD) and the East Riding Allocations DPD. The Core Strategy sets out how the Council will distribute and phase new housing provision in general. The Allocations DPD will identify specific sites that are consistent with this approach.

Following Kate Barker's Review of Housing Supply, Planning Policy Statement 3: Housing (PPS3) introduced a new approach to planning for housing. PPS3 requires Local Planning Authorities to demonstrate a 15-year supply of housing land from the date of the adoption of the relevant local development document. In the case of the East Riding the relevant document is the Core Strategy DPD. This is scheduled for adoption in 2011, which means that the time frame for the study extends to 2026. The East Riding SHLAA is a technical study required by PPS3 to support the new approach.

The broad methodology for the SHLAA is set out in National and Regional Guidance. This requires potential housing sites to be tested according to a framework of;

- **suitability** (is the site a suitable location for housing?);
- **availability** (is it available now or is there a reasonable prospect of it becoming available?); and
- **achievability** (is there a reasonable prospect of housing being achieved on this site).

If these three criteria are met then a site is considered to be **developable** and will contribute to the potential housing figure over the plan period.

The East Riding SHLAA has been prepared in accordance with relevant national and regional guidance. In particular, a steering group, made up of Council officers, representatives from the house building sector (house builders, land agents, surveyors) and other stakeholders, was established to help steer the work and to respond to issues as they arose. From this steering group a methodology was prepared and the sites were then assessed, the results of the assessment were then collated into a report.

The Assessment finds that there is more than a 5 years supply of existing sites arising from planning permissions and released allocations for the East Riding as a whole. The sub area picture is slightly different, the Eastern, Western and Northern sub areas have more than a 6 year supply, but the Central sub area has just over a 5 year of supply. Years 6 to 10 of the plan period are scarcely met by existing housing supply in any of the sub areas and years 11 to 18 are almost entirely unaccounted for.

Assumptions regarding the likely rate of development highlight that within the 5-year period, the housing requirement is likely to be exceeded in the first four years. In the fifth year, completions are likely to be below the requirement. It may, therefore, be that limited additional land release will be required in future years. This will, however, depend on completions in future years and the rate of recovery of the market.

The report finds there is an abundance of potential deliverable sites in all sub areas to meet any shortfall in provision for the 18-year plan period and well beyond this. Therefore the assessment finds that there is no need to outline any broad growth areas.

It is important to note that the report applies the market conditions, status of sites and policy guidance at the time of publication, further annual updates of the SHLAA will include updated information and new policies affecting housing provision. These future updates will need to take account of new elements of the Evidence Base, such as a Strategic Flood Risk Assessment, and ultimately, the adoption of LDF documents.

The SHLAA has been undertaken in a period of extreme uncertainty with regard to the prevailing market conditions. Although a relatively 'conservative' approach has been adopted (in relation to e.g. the pace of anticipated development), it is likely that completions and general developer activity will be very weak for the foreseeable future. This will need to be addressed in future reviews of the SHLAA.

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## 1.0 Introduction

### Background to the assessment

- 1.1 In order for local planning authorities to identify sufficient land to meet the housing demand determined by the Regional Spatial Strategy, Planning Policy Statement 3: Housing, sets out the requirement for Local Planning Authorities to carry out a Strategic Housing Land Availability Assessment (SHLAA).
- 1.2 The East Riding SHLAA forms part of the evidence base for the Local Development Framework, and in particular the allocation of sites set out in the Allocations DPD.
- 1.3 It is important to note the distinction between the SHLAA and the Allocations DPD. **The SHLAA does not allocate sites for development.** Its purpose is to assess the potential supply of sites to meet the likely need for housing (largely determined by RSS). This is a background paper, which will inform the Allocations document. The Allocations document will set out where the Local Planning Authority proposes to allocate land for housing. The preparation of the Allocations DPD will involve a more rigorous sustainability assessment of individual sites as well as a consultation with the wider community.
- 1.4 The SHLAA also helps with the broad selection of locations of new housing as part of the LDF Core Strategy, in that it helps identify the capacity of settlements (primarily the RSS Principal Towns, the Haltemprice settlements and potential local service centres) to accommodate housing growth.
- 1.5 The inclusion of sites in the SHLAA or comments made about them does not in any way infer that those sites will be granted planning consent or allocated for development in the Allocations DPD.

### Context

- 1.6 The Assessment has been carried out in accordance with the policy framework provided by the following context
  - Recent Patterns of Development
  - Planning Policy Statement 3: Housing
  - The Yorkshire and Humber Plan (Regional Spatial Strategy)
  - East Riding Core Strategy Issues and Options
  - Strategic Housing Land Availability Assessments: Practice Guide (DCLG)
  - Yorkshire and Humber Assembly Strategic Housing Land Availability Regional Practice Guide
  - East Riding Housing Site Assessment Methodology
  - Joint Structure Plan
  - Smaller Settlements Document Preferred Options

### **Planning Policy Statement 3: Housing**

- 1.7 Planning Policy Statement 3: Housing (PPS3) sets out the national policy framework for achieving the governments housing objectives. Prepared in response to Kate Barker's Review of Housing Supply (2004), PPS3 places emphasis on increasing the rate of supply in order to meet growing demand and help reduce house prices.
- 1.8 Paragraph 54 of PPS3 states that Local Planning Authorities should identify sufficient specific deliverable sites for housing in the first five years from the adoption of the relevant Local Development Document.
- 1.9 To be considered **deliverable**, sites should be currently **available**, and offer a **suitable** location for housing development now. There should be a reasonable prospect that housing will be delivered on the site within 5 years of the adoption of the plan (**development on the site should be achievable**).
- 1.10 In addition to identifying sufficient specific deliverable sites for the first 5 years of the plan, paragraph 55 states that planning authorities should also identify a further supply of specific, developable sites for years 6-10, and where possible for years 11-15. Where it is not possible to identify sufficient sites for years 11-15, broad locations for future growth should be identified.
- 1.11 To summarise, the local planning authority should identify broad areas and specific sites that will enable the continuous delivery of housing for 15 years from the date of adoption of the relevant development plan document. The East Riding of Yorkshire Core Strategy is not due to be adopted until 2011 the East Riding of Yorkshire SHLAA will have to account for an 18 year supply period.

### **The Yorkshire and Humber Regional Spatial Strategy**

- 1.12 The Yorkshire and Humber Regional Spatial Strategy (RSS) was published and adopted in May 2008. This gives an indicative gross figure of 24,440 dwellings per annum for the region as a whole. The net RSS requirement for the East Riding is 1150 dwellings per annum; the gross requirement is 1190. These should be regarded as floor targets (minima). This gives a gross figure over the remaining 18-year supply period of 21,420 dwellings. It also requires around 40% of this total should be provided within a shared Hull housing market area.
- 1.13 This figure is important in the context of the East Riding SHLAA because it helps determine the dwelling requirements that this report will use when assessing the supply of deliverable and developable housing.
- 1.14 Policy YH7 states that Local Authorities should allocate sites through a sequential approach with:
  - A. First priority to the re use of previously developed land and buildings and the more effective use of existing developed areas within the relevant city or town
  - B. Second priority to other suitable infill opportunities within the relevant city or town

C. Third priority to extensions to the relevant city or town.

- 1.15 Policy YH7 is relevant to the SHLAA because it helps inform the assessment of whether a potential site is suitable for housing.
- 1.16 Policy YH1 (B5.) refers to local service centres as hubs for the rural and coastal economy. This was relevant in deciding which settlements to include in this exercise
- 1.17 The RSS identifies the principal towns in the East Riding as Goole, Beverley, Driffield and Bridlington. Settlements forming part of the RSS-defined regional city of are Cottingham, Hessle, Anlaby, Kirk Ella and Willerby. Each of these settlements will act as a focus for development over the plan period. These are referred to as the Haltemprice settlements.

### **East Riding Core Strategy Issues and Options**

- 1.18 At the time of writing this document the Council is preparing the Core Strategy Preferred Options. As this document will only contain draft policies, it has a very limited bearing on the SHLAA at this time. The SHLAA national guidance says the assessment should be local policy neutral in the absence of an adopted Core Strategy.

### **Strategic Housing Land Availability Assessments: A Practice Guide**

- 1.19 The Department for Communities and Local Government (DCLG) issued this document in August 2007. The practice guidance provides more detailed advice for carrying out a SHLAA, supporting the advice contained in PPS3, including setting out the core requirements and objectives of the assessment. These are:
- A list of sites, cross-referenced to maps showing locations and boundaries of specific sites.
  - An assessment of the deliverability/developability of each identified site to determine when each site is realistically expected to be developed
  - An assessment of the potential quantity of housing that could be delivered on each identified site
  - The identification of potential constraints on the delivery of housing on each site and where appropriate, recommendations on how these constraints may be overcome.
- 1.20 The guidance also places emphasis on the importance of a partnership approach to undertaking the assessment involving Local Planning Authorities working collaboratively where possible and engaging key stakeholders such as housing industry professionals. A partnership approach allows Local Planning Authorities to share experience and to draw on the experience of key stakeholders as well as adding transparency to the process.
- 1.21 The guidance also states that: ‘...the scope of the Assessment should not be narrowed down by existing policies designed to constrain development, so that the local planning authority is in the best possible position when it comes to decide its strategy for delivering its housing objectives’.

## **YHA Strategic Housing Land Availability Regional Practice Guide**

- 1.22 The guidance was released in April 2008. It aimed not to rewrite national guidance, but is an implementation guide designed to assist local authorities across the Yorkshire And Humber region in developing their SHLAAs in a clear and consistent manner.
- 1.23 The guide addresses many of the issues surrounding the SHLAA, including the relationship to DPDs and annual monitoring report. It addressed specific challenges and issues in the region, as well as more detailed instructions on how to carry out the different tests associated with the SHLAA. The guide put emphasis on engagement with stakeholders as well as describing best practice for such engagement.
- 1.24 The guide conceptualised the assessment as a conveyor belt system, a continuous process, with completions at the end of the line and 15year+ sites at the beginning. Windfall sites would be dropped into the conveyor system to push back the need for sites in the years 0-5, 6-10, 11-15.

## **East Riding Housing Site Assessment Methodology**

- 1.25 This document was published by the Council in May 2007, it contains a detailed assessment for housing sites encompassing a broad range of criteria. A simplified form of this assessment has been used to assess sites in the SHLAA.
- 1.26 The first, most critical, question in the assessment supports policy YH1 in the RSS by asking: 'Does a site lie within or adjacent to a settlement that is identified in the LDF settlement hierarchy?' This informs the SHLAA of which sites not to access from the outset.

## **Joint Structure Plan**

- 1.27 This document was adopted in June 2005, and it was agreed (with the Government Office for the Region) that it would act as interim Core Strategy for the Hull and East Riding Authorities pending the adoption of new Core Strategies. A number of policies expired in June 2008 following their replacement with new policies on adoption of RSS, and a number of policies were saved and are being used to develop policies in the core strategy. The policies that were saved which are relevant to the SHLAA are DS3, DS4 and H7.
- 1.28 The JSP uses a sub area approach that divides the East Riding into four quarters, these being northern, central, eastern and western, this approach has been adopted in the SHLAA in order to bring a more local focus to an authority that covers such a large amount of land.
- 1.28 Policy DS3 identifies 8 Towns in the East Riding area, which were given a function of providing the focus for local housing, with the exception of Driffield, which has since been determined as a principal town by the RSS. Policy DS4 states that limited development will be allowed in existing villages if it meets local

needs and conforms to policy H7. Policy H7 states that development in villages should be limited in scale.

### **East Riding Smaller Settlements document – preferred options**

- 1.29 The preferred options version of the Smaller Settlements DPD was published in October 2006 and provided a framework for development in small villages. It identified 28 villages that were to be considered as JSP Policy DS4 ‘market villages’. It is these 28 villages that were considered as suitable to be assessed for development in the SHLAA. Settlements below this level have not been assessed for the purposes of SHLAA. Please note that the Smaller Settlements DPD is not to be progressed further as part of the LDF. Consideration of the role and function of the East Riding’s smaller settlements will be considered through the development of the Core Strategy. The SHLAA updates will take into account of the latest LDF thinking on the settlement network.

### **Recent Patterns of development (5 year trends)**

- 1.30 Recent trends in patterns of development, as shown in tables 1 & 2, taken from the 2008 Annual Managed Release Update have seen overprovision of RSS requirement in northern, central and eastern sub areas as well as a shared Hull Housing Market Area and under provision in the western sub area. Despite this the RSS states that LPAs should adopt a flexible approach to delivery by not treating housing figures as ceilings. Therefore the East Riding SHLAA will use the gross RSS build rate of 1190 a year rather than applying a housing trajectory approach.

**Table 1: Annual net housing completions 2004 to 2008  
by Joint Structure Plan Sub-Area**

	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>
Northern	407	302	242	403
Central	463	547	448	706
Eastern	274	232	517	218
Western	230	184	184	224
Totals	1374	1265	1391	1551
Hull shared housing market area	503	573	526	780

**Table 2: Revised net housing completion numbers  
by Joint Structure Plan (JSP) sub area**

<b>JSP sub-area</b>	<b>JSP annual net housing requirement</b>	<b>Revised annual net housing requirement<sup>1</sup></b>	<b>Principal reasoning</b>
Northern	200	225	Requirement increased to acknowledge Driffield's elevation in the settlement hierarchy to a Principal Town but recognising the sub area's largely rural nature.
Central	400	400	Requirement maintained to avoid risking prejudicing Regional Spatial Strategy advice on the proportion of development to be directed to that part of the East Riding within the Hull shared housing market area.
Eastern	200	250	Requirement increased to support Bridlington's regeneration and to be specifically directed to the town in the northern part of the Eastern JSP sub area.
Western	250	275	Requirement increased to support the Goole area's regeneration, but level of increase limited by the town's and area's flood risk constraints.
<b>Total</b>	<b>1050</b>	<b>1150</b>	

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<sup>1</sup> These figures were agreed with the Yorkshire and Humber assembly in the preparation of RSS (2008 review)

**Table 3: Housing completion numbers between 2004 and 2008**

JSP sub area	Total completions 2004 - 2008	RSS requirement for 2004 - 2008	Over (+)/ Under (-) Provision	
			(no.)	%
Northern	1,354	900	+454	+50
Central	2,164	1,600	+564	+35
Eastern	1,241	1,000	+241	+24
Western	822	1,100	-278	-25
Total ER	5,581	4,600	+981	+21
Hull shared housing market area	2,382	1,840	+542	+29

- 1.31 The 6<sup>th</sup> Annual Update on the Managed Release of Residential Development Sites took account of the increased annual requirement for the East Riding as set out in the adopted RSS and proposed a distribution amongst the JSP sub areas illustrated in Table 2. In the East Riding SHLAA, the Council will therefore not only have to show it can meet the net remaining 18-year RSS figure of 20700 dwellings from 2009 to 2026, but also show it can meet the requirements of the four different sub areas as well as a shared Hull Housing Market Area. The gross figure is 21420 dwellings over the 18-year RSS period.

## **2.0 Consultation**

### **Establishing a partnership**

- 2.1 The National and Regional Guidance stress the importance of a partnership approach, with local planning authorities, regional planning bodies and other key stakeholders working together to ensure a joined up approach.
- 2.2 The Council throughout the process has consulted with other neighbouring authorities, in order to achieve a joined up approach. These authorities include Hull City Council, Doncaster Council, Selby Council and York Council whose housing markets have a marked effect on the market in the East Riding.
- 2.3 In addition to consultation with other authorities, East Riding of Yorkshire Council set up a working group, comprised of:
- Officers from relevant departments in East Riding of Yorkshire Council
  - The Environment Agency
  - Hull City Council
  - Professionals from the house building industry
  - Planning Consultants
  - Officers from the Regional Assembly and Government Office for the Region (GOYH)
  - Gateway, the Housing Market Renewal Pathfinder for Hull and East Yorkshire
- 2.4 The composition of the working group reflects the issues facing housing provision in the East Riding; the presence of the Environment Agency concerns the flooding issues in large parts of the East Riding and the need to factor in flooding issues when formulating the methodology for the assessment. A significant part of the East Riding area falls within a shared Hull Housing Market Area. As a result officers from Hull City Council also attended the working group.

### **Consultation on the Methodology**

- 2.5 A meeting was held with members of the working group on the 9<sup>th</sup> of Aril 2008 to discuss the methodology used for assessing sites. Of a number of issues discussed the most significant conclusions were:
- Site threshold should be 0.25ha or a minimum of 5 dwellings - a smaller threshold than recommended by national and regional policy was acceptable due to the rural nature of the East Riding and a smaller threshold gave more options for rural areas.
  - Sites that are not in or adjacent to Development Strategy settlements<sup>2</sup> in the Joint Structure Plan do not need to be assessed.

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<sup>2</sup> Principal Towns, Towns and 28 'Market Villages' set out in the Smaller Settlements Preferred Options document.

- Sites should not be dismissed purely on the basis of flood risk, other than for flood zone 3b (functional floodplain).
- Calculating density in the assessment is difficult as there is no current policy at local or regional level; it was suggested that densities on sites should be calculated on a site-by-site basis.
- Agreed that unsuitable sites should remain in the assessment but at the bottom of the list
- Despite there being a varying market performance across the East Riding, it was agreed that no locations should be dismissed due to market performance.
- It was agreed that scoring for the sites should be avoided in the assessment and that the level of detail in the assessment should be kept to a minimum.

### **Consultation on the Developability and Deliverability of Sites in the Assessment**

2.6 This is a key part of the assessment that requires input from professionals in the house building industry. The complete assessment of all the potential sites and sites with planning permissions in the East Riding, along with maps, was sent to members of the working group in late July 2008. One of the key outputs of this consultation period was to establish the average number of dwellings a year a developer could expect to build on any given site. For the majority of the East Riding area this was estimated at 50 dwellings per site per annum, but in the Holderness area where the market is weaker the capacity was agreed at 20 dwellings per annum (see also paragraph 3.9 and 4.22).

2.7 Other key data to come out of this consultation stage included:

- Constraints on potential sites as well as sites with planning permission (suitability).
- Possible solutions to constraints
- Details on ownership issues (achievability)
- Estimations on deliverability timescales based on suitability and achievability factors
- Suggestions for sites to be expanded to reflect initial land bids and for extra sites to be included.

2.8 As a result of the consultation, existing information on sites was updated and the remainder of information concerning developability and deliverability was completed. A number of new sites were added and existing sites expanded, mostly in the principal towns or local service centres. Existing sites were not expanded in the market villages, because the service capacity and infrastructure in these settlements cannot support some of the large sites proposed by landowners and developers in these villages. These large expansions would also definitively change the character of these settlements. After this update further sites were added to the assessment. Larger expansions for small settlements will be considered should a shortfall be identified in housing provision.

## Report Consultation

2.9 Consultation was held with stakeholders in mid January 2009 to comment on the draft final SHLAA. The following issues were discussed:

- Agreement that the gross build rate figure of 1190 in RSS is the correct annual requirement for the East Riding rather than the net rate of 1150.
- Using residual annual averages owing to over provision in the first years of the plan period. Following advice from the Regional Assembly, overprovision has been discounted.
- A more sophisticated approach should be taken towards density; different densities should be applied to different types of settlements and sites.
- The housing provision for larger strategic sites should be calculated to take account of potential mixed uses on the site.
- The previously agreed annual build rate in the SHLAA of 50 per year was now too high, in view of the changed nature of the housing market.
- It was agreed that the council should review the length of time estimated between identification of a site and the start of construction. It was suggested that larger sites have longer lead-in times, often due to the need to negotiate S106 and other requirements, and that the length of time should vary between different types of sites.
- It was asked that evidence be shown in the SHLAA that the Managed Released sites and allocations in the assessment would come forward i.e. be deliverable in their stated timescales.
- Developable timescales of sites in the report need to be clarified further showing shortfalls over 5 year periods and clarification that sites providing housing over the projected timeframe are deliverable. i.e. a housing trajectory
- Agreement amongst the working group that a discount rate should be applied to the figures to represent sites not coming forward, e.g. not gaining permissions, the landowner not releasing the site, market conditions etc.

2.10 The above issues were taken into account and the finalised SHLAA was amended accordingly. The list of settlements to be included in the SHLAA is shown below; these are settlements that were derived from previous policies and then agreed with the working group.

**Table 4: Settlements in the SHLAA**

Settlement hierarchy	Settlement name
DS1: Haltemprice settlements	<b>Cottingham Anlaby Willerby Kirkella Hessle</b>
DS2: Principal Towns	<b>Beverley Goole Driffield Bridlington</b>
DS3: Towns	<b>Elloughton/Brough Hedon Howden Snaith Market Weighton Pocklington Hornsea Withernsea</b>
DS4: Market Villages Priority one :	<b>Skirlaugh Leven Keyingham Gilberdyke Holme on Spalding Moor Bubwith Hutton Cranswick Stamford Bridge Middleton on the Wolds Easington Beeford Patrington Aldbrough</b>
DS4: Market Villages Priority two :	<b>Melbourne Wetwang Kilham Roos</b>
DS4: Market Villages Priority three :	<b>Brandesburton North Cave South Cave Leconfield North Ferriby Rawcliffe Newport Nafferton Wilberfoss North Frodingham Skipsea</b>

### 3. Methodology

#### Populating the SHLAA

- 3.1 Over 1500 sites were already in the Council's records, put forward by land owners/developers for inclusion in the LDF process. These were due to be assessed through the published Housing Site Assessment Methodology prior to the DCLG and Regional Assembly's SHLAA guidance documents. In addition to these sites, a call for sites was made to major landholders in the East Riding, including Network Rail, National Grid, Yorkshire Water and major house builders.
- 3.2 Sites in the SHLAA came from 5 different sources:
- **Planning permissions:** as of the 31<sup>st</sup> September 2008, reflecting market conditions in the first half of the financial year. All planning permissions with dwellings yet to be built are included in the figures for table 5, but only those sites with 5 dwellings or over 0.25 hectares in size are included in the SHLAA database/appendix A, in the interest of keeping the database coherent with the 2008 housing land position statement.
  - **Land bids:** sites put forward by landowners and developers, usually unallocated greenfield land, but include a variety of forms, including land currently allocated for housing/employment, brownfield land identified in NLUD and sometimes a mix of types. Land bids make up the majority of sites in the assessment.
  - **Allocations:** All of the East Riding's housing allocations as set out in the Housing Land Position Statement 2008 without planning permission were reassessed as part of the SHLAA. There were 63 of these sites.
  - **NLUD/ Urban capacity:** Brownfield land identified in the National Land Use Database and Urban Capacity Study. It is important to assess all brownfield land in order to contribute to the 65% brownfield target in the RSS, and inform the more local policy through the LDF.
  - **Sites identified by officers:** in a small number of cases, officers identified sites where there was a lack of sites submitted by landowners/developers in key areas such as principal towns - Goole was one of these areas.
  - **Land releases**  
In accordance with the plan: monitor: manage requirement, the Council has released allocated residential development land on four occasions. Sites in Goole and Howden were released between 2005 and 2007, and in December 2008 a number of sites in several different locations were also released. These sites are reflected in the site assessments accordingly.
- 3.3 The deadline for sites to be assessed and included in the first edition of the SHLAA is the end of 2008. The deadline for sites to be included in future annual updates will be the 1<sup>st</sup> of April each year.

#### The Core Outputs

- 3.4 In order for the SHLAA to contain relevant information required by the LDF Core Strategy and Allocations document, it was important to acquire information

that would answer the core requirements as set out in the SHLAA practice guidance.

### SHLAA Core Outputs

1	A list of sites, cross-referenced to maps showing locations and boundaries of specific sites (and showing broad locations where necessary).
2	Assessment of the deliverability/developability of each identified site (i.e. in terms of its suitability, availability and achievability) to determine when an identified site is realistically expected to be developed.
3	Potential quantity (informed by judgements on type, range and quality) of housing that could be delivered on each identified site or within each broad location (where necessary).
4	Constraints on the delivery of identified sites.
5	Recommendations on how these constraints could be overcome and when.

### The Assessment

3.4 East Riding of Yorkshire Council has populated its SHLAA in a simplified manner that achieves these core outputs. The sheer number of sites in the East Riding (which is the largest council by area in the country) meant that this was the only practical way to carry out the assessment in the given timescale. Based on the core outputs the SHLAA was populated with the following fields:

- **Unique ID:** A unique ID for the site, consisting of the name of the settlement that the site is located in and a number that is specific to the amount of sites located in that settlement. This ID cross references to the sites shown on the map in appendix A.
- **Reason considered:** Information showing what source the site came from, i.e. a land bid, housing allocation e.t.c. This question also identifies whether the site is intended for mixed use.
- **Area:** Entire area of the site in hectares.
- **Net Area:** Area of site that can be developed purely for housing, see paragraph 4.9 below.
- **Capacity:** The number of dwellings that can be fitted onto the net site area. Density is calculated as described in paragraph 4.8. These density rates are subject to change in updated versions of the SHLAA when density policy emerges in the East Riding Core Strategy. For planning permissions this number represents the total dwellings yet to be built from the permission.
- **GF/PDL:** Whether the site is composed entirely of Greenfield Land, Brownfield Land, or a mix of both.
- **National policy restrictions:** The national guidance states that only national policy designations should be considered when assessing sites; sites with these designations within their area are considered to be partially or wholly undevelopable. Those sites that are wholly undevelopable will not be included in the potential 15 year housing supply and will be held in abeyance. The following are national policy designations:

Sites of Special Scientific Interest  
 Ramsar Sites  
 Special Protection Areas (SPA)  
 Special Areas of Conservation (SAC)  
 National Nature Reserve (NNR)  
 Scheduled Ancient Monuments  
 Ancient Woodland  
 Health and Safety Executive Inner Zones  
 Flood Risk Area – Zone 3b ‘Functional Floodplain’

- **Level of flooding:** A significant issue for the East Riding, it was decided that flooding should be kept separate from other physical constraints, so as to not discriminate against development in towns and villages that are entirely subject to flood risk. The Environment Agencies flood map was used in the draft SHLAA assessment and was sent to the working group for consultation on deliverability and developability. Further drafts and updates of the finalised version of the SHLAA will feature data from the Council’s Strategic Flood Risk Assessment. The SFRA cannot be used in this year’s edition of the SHLAA as it has not been adopted yet.
- **Physical limitations:** Includes issues that will inhibit the site coming forward and therefore adversely affect its suitability. These issues include: access to the site, neighbouring uses, wastewater treatment works, contamination and topography. Flooding considerations are excluded from this question, as to not discriminate against development in towns and villages that are entirely subject to flood risk. The exception to this is if the site is situated in zone 3b ‘Functional Floodplain’
- **Ownership Status:** Whether a site is available to come forward, most sites are as they have been submitted by the owners or by developers/ agents on behalf of the owners
- **Can availability and suitability constraints be overcome?** A range of possible solutions for any availability or suitability constraints.
- **Achievability and cost factors:** This is a judgement of the economic viability of the site’s development and the capacity of a developer to complete and sell houses on any given site. This column required input from house builders. The information given relates to:

Market factors – the level of potential demand and projected rate of sales

Cost factors – including site preparation costs, any exceptional costs, relevant planning standards and the prospect of any funding to overcome identified constraints.

Delivery factors – the developer’s own intentions for the site, including phasing and realistic build out rates.

- **Overall deliverability:** Based on the suitability, availability and achievability of the site, a timeframe of deliverability can be given. If a site is currently suitable, available and achievable it will be placed into the 1 to 5 year supply. A site that has issues that can be resolved in the short to medium term is placed in the 6 to 10 year supply of sites. If a site has issues that can only be resolved in the long term then the site will be placed in the 11 to 18 year supply of sites. If the site has issues that cannot be overcome even in the long term the site is held in abeyance

until the next assessment and the site will not be included in the figures for supply in the East Riding.

### Calculating Density

- 3.6 The Yorkshire & Humber regional practice guide for the SHLAA recommends a range of localised density figures and where there is a lack of local density figures, to use best practice in previous urban capacity work. The Council has chosen to use density figures for the previous 5 years. Average density figures were taken for all the settlements in each tier of the LDF settlement hierarchy.
- 3.7 As well as there being four different density calculations for types of settlement, there were also an additional two density calculations based on the type of site. These two types were brownfield and greenfield. A distinction was made between these two types of site because brownfield sites tend to be higher density as they are predominantly in the centre of towns where density is already high.

Greenfield figures: DS1: 34 dph, DS2: 30dph, DS3: 38dph, DS4: 27dph (an average of 30dph for the whole of the East Riding)

Brownfield figures: DS1: 37dph, DS2: 68dph, DS3: 49dph, DS4: 30dph (an average of 44 dph for the whole of the East Riding)

- 3.8 The figure of 30dph has been kept for all greenfield sites; the council believes this a conservative estimate that closely reflects actual densities on recently built greenfield housing sites. For brownfield sites a figure of 40 dwellings per hectare has been used, except in DS4s where a figure of 30 is still kept. This a better reflection on densities that can be expected on brownfield sites as they are predominantly in the centre of towns where density is already high. The figure of 30 is kept for Brownfield sites in DS4 market villages because density in such settlements is low even on brownfield developments.

### Calculating Developable areas

- 3.9 When calculating the housing potential for any site using the gross area can be misleading. This is because space on a housing site is often used for a number of ancillary uses, such as roads and green space. Larger sites tend to have more of their area taken up by non-housing uses. Therefore, the net potential of a site is used to calculate the number of dwellings. The council has taken the broad approach outlined in the URBED document: Tapping the Potential. This works calculates a gross to net ratio based on the site area. The ratios per site area for the East Riding are set out in the Strategic Urban Potential Study of July 2002:

#### Developable Areas

Site area (ha.)	Gross to Net Ratio
Up to 0.5ha	100%
From 0.5 to 2	85%
Over 2ha	65%

- 3.10 Land bids in the assessment database that have been submitted to the council as mixed developments have had their non housing uses deducted from the gross area. Sites on which this has occurred have been marked as ‘mixed use’ in the ‘reason considered’ question. From the remaining net area of a site used for housing the gross to net ratio is applied, after this the density multiplier will be applied to find the potential housing capacity of a site.

### **Drawing up the sites**

- 3.11 Before the assessment began a decision was made on which sites were to be assessed in the SHLAA. Only those sites that were within or adjacent to settlements recognised as being in Haltemprice (Policy DS1 of the JSP), Principal Towns (DS2), Local Service Centres (DS3) or Market Villages (DS4)<sup>3</sup> were included in the SHLAA. This approach was based on: (1) focussing new development towards more sustainable settlements and (2) helping to retain the character of smaller settlements.
- 3.12 The approach also reflected the fact that initial assessments of supply indicated that the East Riding had an abundance of sites without significant restraints in and around the settlements listed in the hierarchy to meet an 18-year housing supply. Therefore, there was no need to assess sites in smaller settlements. This means that many sites sent in as land bids are not included in the SHLAA assessment. This approach to the methodology was agreed with the working group before the assessment began.
- 3.13 In some cases, the council assessed only parts of the sites submitted as land bids. This was particularly the case for large sites in small settlements where the prospect of such growth was considered to be unlikely and inappropriate in scale.
- 3.14 In the majority of cases the land bids were assessed as they were submitted but some sites were either joined or spilt up in order to produce realistic and tenable housing sites and to make them easier and more practical to assess.
- 3.15 As a result of consultation with the working group on the issues of achievability and deliverability there was a call from developers and landowners for a number of sites to be included which had been excluded, as well as a call for sites to be assessed in their entirety and not reduced in size. As a result of this consultation it was decided to change the approach slightly to drawing up sites. Most sites in Haltemprice, Principal Towns and Local Service Centres that had been reduced in size were included in their entirety. The approach adopted in smaller settlements, however, was retained. This approach will be revisited should a shortfall be identified.

### **Methodology for Achievability Timescales**

- 3.16 The achievability timescale is an estimate of how many dwellings can be built on a site in a year. This is affected by factors such as the strength of the housing market in the area, the length of time involved in pre-application discussions in

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<sup>3</sup> The Smaller Settlements Preferred Options document has been used in the absence of any other policy direction.

order to negotiate section 106 agreements etc, and the number of developers on a site and their capacity to build out that site. The assumed rates are:

35 dwellings per annum (d.p.a) on sites with less than 200 units (assuming 1 developer)

70 d.p.a on sites with 200 to 400 units (assuming 2 developers building at 35dpa)

105 d.p.a on sites with over 400 units (assuming 3 developers building at 35dpa)

3.17 These completion rates are based on average site completion rates in the East Riding over the last 5 years, as well as developer knowledge on the subject of completions. The achievability timescale of each site is calculated by dividing the identified capacity by this rate. To reflect the poor market conditions present in the East

3.18 The working group highlighted that the area of southeast Holderness has a relatively weak housing market compared to the rest of the East Riding. The demand for new housing is relatively low and, therefore, the number of dwellings completed per year tends to be lower than in the rest of the East Riding. Average completion rates over the last 5 years showed 20 d.p.a were completed on individual large sites in the Holderness area. The settlements to which this low demand figure applies are:

20 d.p.a figure applies to: Withernsea, Easington, Patrington, Keyingham

3.19 To reflect the reduced build rates in the East Riding due to the housing market downturn, a lower build rate has been applied for sites with permission and other sites subsequently released by the Council. This build rate is set at just less than half the rate for potential site:

Build rate for sites with planning permission: 15 dwellings per annum

3.20 This reduced build rate applies to the financial years 2008-2009 and 2009-2010; after this period the market is widely predicted to recover and so the rate is returned to that shown in paragraph 4.18.

3.21 In addition to the time period relating to the rate of build, there is the lead in time from the point of identification of a site to the start of development to take account of. It was agreed with the working group that the larger the site the longer the timeframe required in pre-application and application periods to negotiate section 106 agreements etc. The pre-build timescales agreed with the working group were:

Sites less than 0.5 hectares: 12 months

Sites between 0.5 and 2 hectares: 18 months

Sites over 2 hectares: 24 months

3.22 Large sites with outline permissions in the database also have a 12-month pre build period applied, to reflect the amount of time taken to apply for full planning permission by a developer.

## 4 Assessment Findings

### Introduction

- 4.1 The fundamental purpose of the SHLAA is to identify a sufficient supply of housing sites to enable local planning authorities to plan ahead for 15 years from the anticipated date of adoption of the relevant plan document. This assessment uses a 18-year time frame in order to project 15 years from the scheduled date of adoption of the Core Strategy. This also ties in with RSS plan period (i.e. to 2026). The 18-year time frame is broken down into deliverable (0-5 years), developable (6-10 years) and developable (11-18 years). The presentation of the assessment findings is as follows:

Step 1: Identifying those sites with planning permission assessed as suitable for housing development.

Step 2: Testing the availability and achievability of those sites without planning permission to determine whether they can be included in the 18-year supply of housing land.

Step 3: Determine whether East Riding of Yorkshire Council has an 18-year supply of specific, deliverable/developable housing sites.

Step 4: Identifying and assessing the housing potential of broad locations.

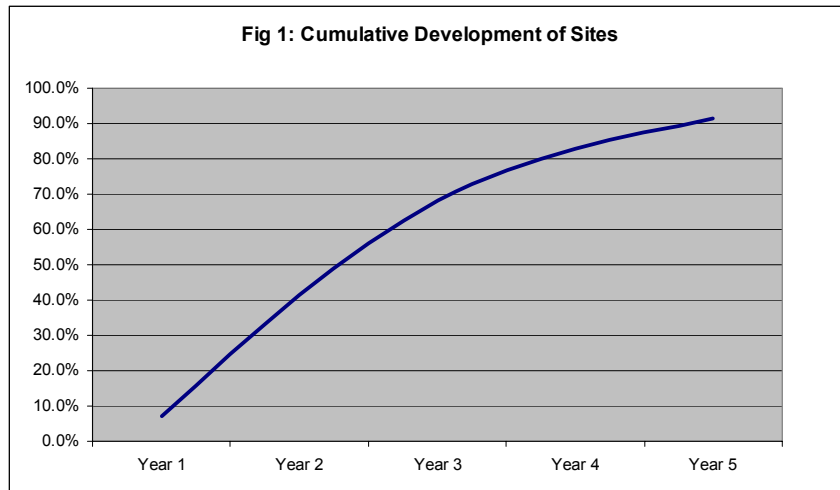
### Step 1 - Suitability

#### Existing planning permissions

- 4.2 The combined dwelling capacity of large sites with planning permissions in the database as of September 2008 is 3445. The total for small sites<sup>4</sup> with planning permission is 1771. The sum of both is 5216 of which 3520 are brownfield plots.
- 4.3 In relation to large sites assumptions have been made reflecting the pace at which sites are likely to be developed (refer to paragraph 4.18). In relation to small sites, research into past permissions (between 2001-2008) showed that on average only 91% of dwellings that gained permission were actually built in the first 5 years - this can be seen in Fig 1 below. Therefore, a 10% discount has been applied to the figures for small sites with permissions in the first 5 years in order to produce a more accurate prediction for the first 5-year plan period. This discount is applied in table 5. After the discount rate is applied the total comes to 1654 for small sites.
- 4.4 Small sites with permission have been projected into the housing trajectory at a rate of 331 dwellings a year. The 331 (1654/5) relates to small sites with permission already in the system which we expect to come forward (or at least do not consider there to be any constraints) in the next 5 years.

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<sup>4</sup> Although small sites have not been included in the database, as explained in paragraph 4.2, a contribution from such development is included in table 5 and appendix A.



## Step 2 - Achievability

### Managed Release Sites.

- 4.5 There are 23 sites in the East Riding that have been released since 2005 through the Managed Release process and have yet to obtain planning permission or be fully built out. Their analysis in the SHLAA database shows that the sites are deliverable in the first 5-year period as they are shown to be suitable, available and achievable.
- 4.6 These sites have a total of 2512 dwellings to add to the supply within the plan period. However, when using a trajectory approach, as shown in appendix x, the amount that can be delivered in the first 5 years is reduced to 1932. This adds an extra 1.6 years to the total supply. When the released sites are added to the planning permissions, the total supply for the East Riding is 7728. The amount that can be delivered in the first 5 years is 7021, or 5.9 years of supply.
- 4.7 Table 5 shows supply for sites with planning permissions and allocated sites released for development to maintain a 5-year supply. The table only includes those sites that have been predicted in the trajectory to come forward in the first 5 year of the plan period. The biggest shortfall in terms of planning permissions is the western sub area. The sub area with the greatest supply from permission is the northern sub area. When supply from released sites is taken into account it is the Central area that has the least amount of supply, with just over a 5-year supply. The amount of supply in the western sub area is brought up by the substantial amount of land releases in the western sub area. As a total the East Riding has more than a 5-year supply.

**Table 5: Five year housing supply from September 2008**

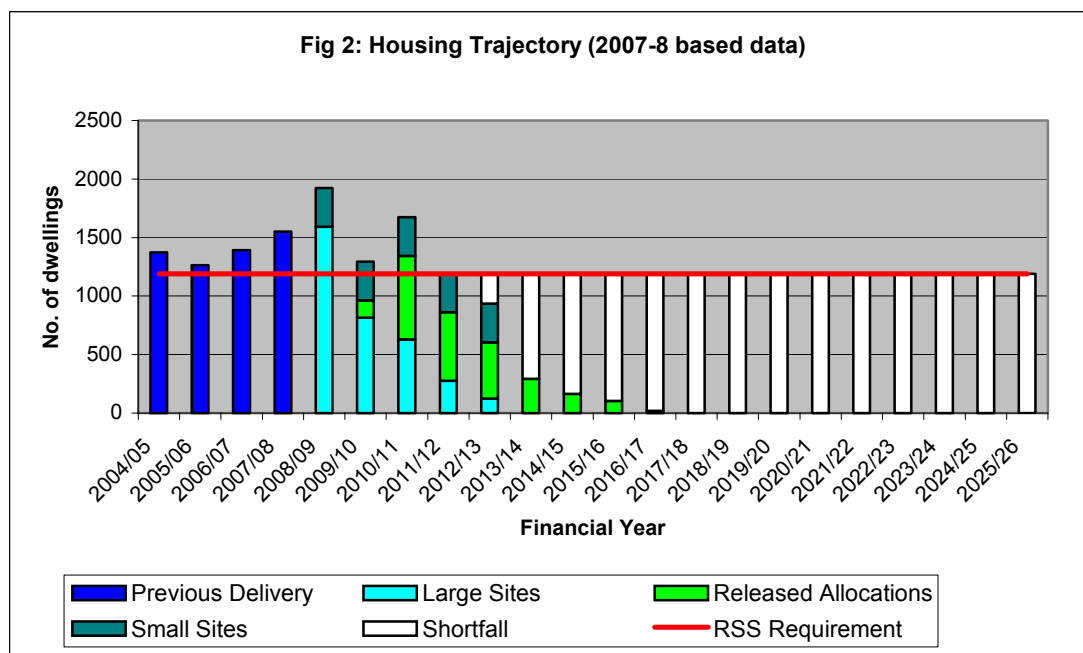
<b>Sub area</b>	<b>Northern</b>	<b>Central</b>	<b>Eastern</b>	<b>Western</b>	<b>Totals</b>
<b>Large sites with planning permission</b>	693	1295	937	509	3434
<b>Small sites with planning permission</b>	387	454	562	252	1654
<b>Managed Release sites</b>	347	357	210	1018	1932
<b>Permissions + Managed Release supply</b>	1427	2106	1709	1779	7021
<b>Annual RSS requirement (Gross)<sup>5</sup></b>	235	410	260	285	1190
<b>18 year RSS requirement (Gross)</b>	4230	7380	4680	5130	21420
<b>Total years supply with permissions</b>	<b>4.6</b>	<b>4.3</b>	<b>5.8</b>	<b>2.7</b>	<b>4.3</b>
<b>Permissions + released sites</b>	<b>6.1</b>	<b>5.1</b>	<b>6.1</b>	<b>6.2</b>	<b>5.9</b>

### **Step 3 – Determining an 18-year supply (Housing Trajectory)**

- 4.8 Figure 2 shows housing supply in the East Riding over the entire RSS plan period, including the previous 4 financial years (2004/05 to 2007/08) the current financial year (2008/09) and the remaining 17 years of the plan period. The delivery of planning permissions and sites subsequently released by the council over time was projected using a discounted rate to take account of the housing market downturn (refer to paragraph 4.21). This can be seen in appendix A. The delivery of managed release sites was projected using the build rates agreed with the working group as described in paragraph 3.18; this can be seen in appendix B. The pre-application periods for sites (as described in paragraph 3.23) were also built into the trajectory. Small sites with planning permission were projected in a pro rata method described in paragraph 4.4.
- 4.9 The housing trajectory shows the supply of housing in the East Riding spread over time using the trajectories described in paragraph 4.8. The graph shows overprovision in the first 3 years of the plan period. The provision for 2011-12 is just over the 1190 RSS gross requirement. The trajectory shows there is a potential shortfall of 254 dwellings in the year 2012-13. The reasons for the discrepancies in the 5.9 year supply shown in table 5 and the shortfall over the 5

<sup>5</sup> This is based on the net requirement set out in table 3 and on a pro rata split of the additional 40 dwellings across the four sub areas to account for the difference between gross and net RSS figures.

years shown in table 6, are due to the RSS requirement being exceeded in the first 3 years of the plan period and due to a substantial proportion of dwellings from the managed released allocations coming forward after the first 5 years. The pattern of provision shown in the trajectory has been fundamentally altered by the housing market decline, as shown below.



### Housing market decline

4.10 The recent housing market decline has seen a significant reduction in the rate of house building. Factors include lending policy, house price falls, and general market confidence. Despite the substantial recent reductions in Bank of England interest rates there has been a marked tightening of lending policy by financial institutions (both to developers to finance new builds, and the inability of potential house purchasers to secure mortgages). The fall in value of the average house price impacts on site viability and the willingness of people to commit to moving home, as does overall market confidence. The impact of the housing market decline in the East Riding is illustrated below by comparing completion rates from the first two financial quarters of 2008 with the first two in 2007.

Year	Completions between 1 <sup>st</sup> April and 30 <sup>th</sup> September	Completed in financial year	% Completed in first two quarters.
2007	291	1551	19%
2008	90	474 (projected)	19% (projected)

4.11 Completions for the first two quarters of 2008 were only 31% of what they were in 2007. Projected figures put the completions for the year 2008-09 at less than half of the RSS requirement of 1190 and it is unlikely that the market will recover in the year 2009-10. Completions next year may well be lower than this, as only homes currently under construction are likely to be completed and there are no known new starts. This means that despite trying to amend build rates to take

account of the decline in the market (see paragraph 4.21), the accuracy of the trajectory above is questionable, particularly for the first couple of years. However, it would be unwise to base our figures for completions, and overall future requirements, on this rate for the medium to long term, as the downturn in the market is, by best predictions, to last for a few years at most.

- 4.12 Although the downturn in the market may produce a shortfall in the existing supply against the RSS requirement for the first couple of years, the sites not delivered in this short-term period are predicted to come forward in the medium to long term. This will likely provide an excess of housing provision against the RSS requirement that will make up for the short-term shortfall, and so an additional release of housing land will not be necessary.

#### **Assessment of potential sites**

- 4.10 The above information clearly highlights the importance of assessing potential housing sites in order to meet the 11.8 years of shortfall (14042 dwellings) over the 18-year period. After the initial sieving process relating to small sites, sites in small settlements and other sites in unsustainable locations (refer to paragraph 4.2) 419 sites remained to be assessed in the SHLAA.
- 4.11 The 419 sites have a potential capacity of 44,375 dwellings. Of the 419 sites 13 had national policy constraints that meant they are not developable within the plan period, or had ownership or access constraints that could not be overcome; these sites have been held in abeyance as agreed by the working group and are shown in table 7. A total of 630 dwellings had to be taken out of the supply for this reason, leaving 43,745 dwellings, or a total of 37 years of potential supply. This total will, of course, decrease markedly once policy constraints from the Core Strategy are applied.

**Table 6: Sites held in abeyance**

Unique ID	Location	Issues/Constraints	Capacity
Beverley 1	Grovehill Road	Site lies over a Scheduled Ancient Monument	11
Bubwith5	Land west of Vine Gardens	No access possible	10
Hutton Cranswick7	Land between South Gate and Beech View	Owners not willing to sell	50
Hutton Cranswick14	Land between Raynard Close and Churchill Avenue	No access possible	6
Leven2	Land to the west of Mill lane	Owner not willing to sell	42
Stamford Bridge4	Burton Fields	Registered battlefield of national importance.	82
Stamford Bridge5	Stamford Bridge Battle Flat	Registered battlefield of national importance.	70
Stamford Bridge6	Land adjacent to Moor Road	Registered battlefield of national importance.	124
Stamford Bridge7	Brown Moor	Registered battlefield of national importance.	58
Hedon11	Land south of Havenside	Site lies over a Scheduled Ancient Monument	13
Hedon3	Fairfax Drive	Site lies over a Scheduled Ancient Monument	49
Snaith3	Land North of Gowdall Lane	Floodzone 3b functional floodplain on the whole site	26
Snaith4	Land East of Selby Road	Floodzone 3b functional floodplain on the whole site	92
Total			630

**Potential Sites- Brownfield Land**

- 4.12 In terms of potential supply of brownfield sites in the SHLAA, 31 are 100% brownfield; these sites have a combined area of 57 (gross) hectares and a capacity of 2280 dwellings (net). 77 sites have a mixture of brownfield and greenfield land, the total area of brownfield land within these mixed sites is 113 hectares, with a capacity of 4520 dwellings at 40 dwellings per hectare. The combined brownfield potential from each of these two types of sites is 170 hectares. This represents 6800 dwellings, or 15% of the total dwelling capacity in the SHLAA list of potential sites, or 5.7 years of supply.
- 4.13 By means of comparison, the National Land Use Database identifies 451 hectares of brownfield land in the East Riding of Yorkshire that could theoretically be used for housing, which equates to 13,521 dwellings and 11.8 years supply. The variation in capacity reflects in part the fact that the SHLAA has been populated

through the involvement of developers, agents and landowners (i.e. it reflects the market more closely than NLUD). The NLUD's theoretical capacity includes large sites in remote locations such as disused airfields, which are likely to be completely unsuitable for residential development.

### Unreleased Allocations

- 4.14 There are 44 sites allocated in the four existing Local Plans covering the East Riding that have not been released and have been assessed in the database to be deliverable in the first 5 years of the plan period. These have a combined area of 94 hectares gross and a net developable area of 66 hectares, with a capacity of 1985 dwellings. This amounts to 1.7 years of supply for East Riding to meet any possible shortfalls, after permissions are accounted for, in the first 5 years of the plan period. Of the 1985 dwellings, only 54 of these could be built on brownfield land.

**Table 7: Remaining deliverable allocations by sub area**

	North	East	West	Central	Total
<b>Total gross area (ha)</b>	27	28	6	37	94
<b>Total net area</b>	20	20	4	26	66
<b>Total net capacity</b>	598	589	135	782	1985
<b>Years of sub area supply</b>	2.5	2.3	0.5	1.9	1.7

### Step 4 - Broad Locations

- 4.15 As it has been shown that the East Riding has a supply of suitable, achievable and deliverable sites, through and well beyond the plan period, it is not necessary to search for broad locations for development. This would also be the case if the housing requirement in the East Riding was to be increased through the review of RSS. A higher requirement could be met without compromising the spatial priorities in RSS.

## **5 Summary and Conclusion**

- 5.1 The SHLAA has identified 700 sites, which have a total capacity to deliver 53,447 dwellings. 5,216 of these could be provided on sites that currently have permission, 2,512 could be provided from the managed release of sites since 2005 (without permission), 1,985 from unreleased allocations and 43,375 from potential sites. Of the total dwelling capacity, an estimated 10,374 could be delivered on brownfield land.
- 5.2 The assessment has identified that the East Riding has 5.9 years of supply from sites with permissions and sites that have been released for development that will come forward in the first five years. This equates to 5,216 dwellings, 3,520 of which could be built on brownfield land. The picture across the sub areas varies. The central sub area has just over a 5-year supply; therefore, it has the greatest number of dwellings that need to be built. The 3 other sub areas have an existing supply of dwellings for over a 6 year period. No new land releases are likely to be needed in the short term.
- 5.3 This leaves 12.1 years supply to be identified and provided, which is approximately 14,399 dwellings on 480 hectares of land (at 30 dwellings per hectare). The assessment of potential sites and unreleased allocations has shown that 6,854 of these could be delivered on brownfield land. In the supply periods 6 to 10 and 11 to 18 years, extra sites will need to be identified. The SHLAA has shown that there is an abundance of sites that are, in theory, suitable, achievable and deliverable for these years of the plan in all the sub areas. Therefore, there is no need to identify any new broad locations of growth within the East Riding or apply a windfall allowance.
- 5.4 The assessment has shown that the total number of dwellings that could theoretically be built on brownfield land is 10,374, this equates to 48% of the total 18 year requirement as set by RSS. This assumes that all brownfield land identified would be prioritised for development and is, therefore, an upper limit.

### **Keeping the Assessment up to date**

- 5.5 In compliance with PPS3, the SHLAA will need to be annually monitored and updated in order to achieve a rolling year 5-year supply of housing land. As indicated above, the current depressed rate of completions means that some of the assumptions made around recovery may be optimistic. If building rates do not return as hoped, the land supply period is, in effect, extended. This emphasises the need for monitoring and review. The introduction of the SHLAA has heralded a change in the way the East Riding intends to monitor its housing provision. The Housing Land Position Statement and the Annual Update on the Managed Release Report will be combined into the SHLAA to produce one document in future years. This document will be able to set out the current and past trends of housing supply in the East Riding, project potential supply, identify shortfalls and then release land accordingly in future years.
- 5.6 The annual review will need to consider issues such as:

- Sites under construction have now been developed, or individual phases have been developed
- Sites with planning permission are under construction and what progress has been made.
- Planning applications have been submitted or approved on sites identified in the assessment.
- Progress has been made in removing constraints on development and whether a site is now considered deliverable.
- Unforeseen constraints have emerged which means a site is no longer deliverable
- Whether or not assumptions the contribution to supply from small sites are still valid.
- New land bids
- Changing national policy context and relevant evidence e.g. SFRA.
- Policy context provided by Core Strategy Policies (from 2011) and the development of the Core Strategy over the next few years.

5.7 All the above monitoring information will of course be agreed with the working group before the SHLAA is updated and adopted year on year.