

EAST RIDING OF YORKSHIRE COUNCIL

Report to: The Cabinet
09 December 2008

Wards:

All wards

Sixth Annual Update on the Position with The Managed Release of Residential Development Sites

Report of the Director of Corporate Policy and Strategy

A. Executive Summary

This report is the sixth annual update of the housing completions and future supply position in the East Riding. A major feature of this year's update is that it takes into account the publication of the new Regional Spatial Strategy in May 2008, which included revisions to the area's strategic housing requirement and to the base and end dates used to calculate the future housing supply.

The report highlights that the overall number of dwellings completed in the East Riding in 2007 (financial year 1 April 2007 to 31 March 2008) was 35% above the housing provision requirement set out in the Regional Spatial Strategy. However there was a variation between the area's four sub areas. Whilst completions in the Northern and Central Joint Structure Plan sub areas were significantly above the requirement, completions in the Eastern and Western Joint Structure Plan sub areas were below.

The report then:

- assesses the level of provision in each sub area against the housing requirement for the initial four years of the Regional Spatial Strategy;
- finds that the proportion of completions on previously developed land decreased from 57.7% in 2006 to 50.0% in 2007, but it is still substantially above the levels before the Interim Planning Guidance was introduced in 2003;
- reviews the number of houses completed on previously developed windfall and small sites and re-assesses the allowances made for those likely to come forward on small sites in the future; and
- analyses the number of houses granted on the various 'pragmatic exceptions'.

In light of the housing supply/completion position at the end of the 2007 financial year and other relevant considerations, the report then considers whether there is a need to release any Greenfield sites in order to provide a 5 year supply of housing sites.

The report proposes the release of further Greenfield sites in all four of the Joint Structure Plan sub areas.

B. Corporate Priorities 2008-2011

Valuing our Environment
Revitalising our Communities
Retaining the East Riding Character

A Well Managed Authority

C. Portfolio

Key Strategic Issues
Policy, Performance and Strategic Partnerships

D. Recommendation and Reason for Recommendation

It is recommended that:

- (a) in order to provide a 5 year supply of housing land the following allocated sites be released in the respective Joint Structure Plan sub areas in addition to those sites already released as part of previous annual updates:

Northern Joint Structure Plan sub area:

DRIFF3 – East of New Walk/The Chase, Drifffield
MARK5 – South of 43-73 Market Place, Market Weighton
MARK11 – North of Holme Road, Market Weighton

Central Joint Structure Plan sub area:

H1ap – West of Longmans Lane, Cottingham
H1aa – South of Keldgate, Beverley
H1ac – East of Queensgate/West of Victoria Road, Beverley (Woodmansey parish)
In2b – South of Hull/Kings Cross railway/east of Skillings Lane, Brough

Eastern Joint Structure Plan sub area:

BRID10 – North of Easton Road, Bridlington

Western Joint Structure Plan sub area:

S15D – East of Sandholme Road, Gilberdyke
S30A – North of High Street, Rawcliffe
S15C – North of Gilberdyke railway station
S25E – North of the B1230, Newport
S25B – Off Canal Side West, Newport
S25A – East of Thimblehall Lane, Newport

- (b) it is recognised that non-allocated Greenfield sites may come forward for development that perform better or equally as well as a released allocated site in the same sub area when assessed against the criteria in the Council's Housing Site Assessment Methodology. These could involve sites in the following settlements in the respective sub areas: Northern - Drifffield, Market Weighton and Pocklington; Central - Anlaby, Cottingham, Hessle, Kirkella, Willerby, Beverley, Elloughton/Brough and Hedon; Eastern – Bridlington; and Western – Goole, Howden, Snaith, Gilberdyke, Newport and Rawcliffe. In such circumstances the application will be determined in accordance with the Development Plan and all other relevant material planning considerations;

- (c) with the exception of recommendations (a) and (b), the prevailing approach to the release of residential development sites as set out in the Council's adopted Interim Policy Guidance on the 'The Managed Release of Residential Development Sites' October 2003 be reaffirmed;
- (d) a development brief be prepared for the mixed use development on the In2b site South of Hull/Kings Cross railway/East of Skillings Lane, Brough to deal with the phasing of development, the appropriate balance of uses on the site and the other planning issues likely to arise from its development;
- (e) an addendum be prepared to the 2001 development brief for the BRID10 North of Easton Road, Bridlington site to clarify any changes in the planning issues affecting its development since that date; and
- (f) a further monitoring report be submitted to The Cabinet on the housing supply/completion position at the end of the 2008 financial year and on whether the prevailing approach to the managed release of residential development sites should be revised. This should include particular attention to the progress made with the development of those sites referred to in (a) above.

1. Background

- 1.1 The Full Council adopted Interim Policy Guidance (IPG) on the 'The Managed Release of Residential Development Sites' on 15 October 2003 (min 1032). This included an approach on how all planning applications for residential development will be treated.
- 1.2 The approval was given subject to an annual monitoring report being submitted to The Cabinet on the housing supply/completion position. This was to allow consideration of whether the prevailing approach to the release of sites should be revised.
- 1.3 The Cabinet has considered five previous annual monitoring reports that have examined housing supply/completion position in each of the four Joint Structure Plan (JSP) areas (a map of the sub areas is attached at Appendix A). The first was on 9 December 2003 that reviewed the position at mid-2003 (min 1717) and the second was on 21 July 2004 that reviewed the position at 1 April 2004 (min 1978). In each of these first two reports the approach set out in the IPG was reaffirmed.
- 1.4 The third report on 14 July 2005 (min 2340) and fourth report on 18 October 2006 (min 2766) recommended that major Greenfield sites be released in the Western Joint Structure Plan sub area. This was a response to the calculated supply position in that sub-area which indicated that there was a need to release some sites to meet the strategic housing requirement. The sites released were selected following a 'sequential approach' for sites in that Western sub-area agreed by the Cabinet on 13 December 2005 (min 2491).
- 1.5 The fifth annual monitoring report on 3 September 2007 (min 3052) released a further site in the Western Joint Structure Plan sub area to meet its strategic housing requirement. This site was chosen following a Methodology¹ the Council adopted that sets out the way it will assess and compare the suitability of potential housing sites. Whilst this was prepared primarily to help consideration of sites for the Local Development Framework's preparation, it serves as the most up-to-date means of assessing the suitability of sites for release as part of this update.

¹ Housing Site Assessment Methodology, May 2007

- 1.6 The Methodology assesses potential sites against various considerations. It does this in a number of stages that act as a sieving process. The initial stage prioritises sites within or adjacent to settlements identified in the settlement hierarchy and excludes those sites with principal environment or cultural constraints (e.g. conflict with international/national nature conservation designations or area at greatest risk from flooding).
- 1.7 This report reviews the approach again in the light of the number of house completions in 2007 (financial year), the housing supply position at 1 April 2008 and the implications of the Regional Spatial Strategy that was published in May 2008, which included revisions to the housing trajectory base and end dates and the strategic housing requirement. This report then considers whether the current approach to ‘Managed Release’ should be revised.

2. Regional Spatial Strategy and other policy issues

- 2.1 The Secretary of State published the Regional Spatial Strategy to 2026 (the ‘Yorkshire and Humber Plan’) in May 2008. This superseded the version that was published in December 2004. This new Regional Spatial Strategy includes the following provisions for the East Riding that will need to be taken into account in this update:
- the revised base date for the calculation of the housing trajectory (of 2004 instead of 1998),
 - the revised plan period, which runs from 2004 to 2026, and
 - the revised strategic housing requirement (1,150 net/1,190 gross houses per annum instead of 1,050).
- 2.2 The Regional Spatial Strategy also states “around 40% of the East Riding’s housing provision should be within the Hull housing market area. This approach is to support housing market renewal and help tackle low demand in the City, whilst delivering the Core Approach of focusing development on the Regional City. Development must be managed in line with policy H3.”²
- 2.3 RSS policy H3 requires planning authorities to manage the release of land in support of interventions to address failing housing markets. These interventions should support those parts of the Region with frail or failing housing markets in a manner that returns these markets to health and does not undermine housing markets elsewhere in the Region. Policy H3 also requires the delivery of additional housing to support strategies and programmes for those areas where interventions are already in place and local markets that adjoin these areas. The areas specifically mentioned include the Gateway Hull/East Riding Pathfinder.
- 2.4 The supporting justification to RSS policy H1 also explains that for the Humber Sub-Region that “The figures for Hull and East Riding reflect the strategy of transforming the Regional City of Hull and reversing historic dispersal to the East Riding whilst allowing appropriate levels of development to support sustainable rural communities. This strategy will take some time to fully achieve its goals and net housing growth in Hull is likely to increase gradually over the Plan period (as is recognised in Table 12.2) as regeneration and housing market renewal take effect.” Accordingly Table 12.2 identifies the East Riding as an authority where annual net growth is likely to fall from above the 2008-2026 average to below it.
- 2.5 Although Joint Structure Plan policy H1 has now been superseded by the Regional Spatial Strategy and the Regional Spatial Strategy divides the Region into a number of broad policy sub areas, the Regional Assembly did state in its submission to the Secretary of State that:
- “Regional Spatial Strategy sets a new housing requirement in policy H1 (A), and therefore supersedes the equivalent Joint Structure Plan policy. The Joint Structure Plan policy does provide a broad strategic*

² See footnote to Table 12.1 as referred to in RSS policy H1B.

direction for the distribution of the housing requirement by sub-area that is not contained in the Draft Regional Spatial Strategy and the Secretary of State's Proposed Changes. Whilst the East Riding Core Strategy is being prepared it would be helpful for this broad direction (and the information in table 6.2 of the Joint Structure Plan) to be supported as the policy context within which housing development should take place in the East Riding but this can be supported by the Assembly without the policy being saved."

- 2.6 The Council will therefore continue to use the four sub areas set out in the Joint Structure Plan (see Appendix A) for the purposes of the distribution of the East Riding's strategic housing requirement. However, this leaves the issues of the apportionment of the additional 100 (net) houses and the maintenance of around 40% of the East Riding's housing provision in the Hull housing market area to be dealt with.
- 2.7 As part of their various deliberations, the Panel considering representations to the Regional Spatial Strategy had to deal with the Office for National Statistics household projections suggesting that a higher number of new houses would be required over the plan period than was set out in the Draft Regional Spatial Strategy. The Council put forward evidence to indicate how any additional housing (above the 1,050 Joint Structure Plan figure) should be distributed. This suggested that the distribution needed to reflect the need for regeneration/renaissance within certain Principal Towns. In particular, it was proposed that Bridlington and Goole would both potentially benefit from this approach.
- 2.8 The Area Action Plan currently being prepared for Bridlington suggests that significant housing growth will be required in order to transform the local economy of the town. Whilst much of this growth should be provided within and around the town centre (to establish critical mass of activity, development and population), it was recognised that housing development will continue to occur in other locations in the town.
- 2.9 Significant economic growth has occurred and is taking place in the Goole area (e.g. at Capitol Park - an identified strategic employment site). Although levels of new house completions in Goole have traditionally been relatively low, this has in part been due to poor economic prospects and, in particular, the previous constraints to the development of the Capitol Park site. However, attempts to release land in Goole to maintain the improved house completion rates was being hampered by increased restrictions being enforced by the Environment Agency over flood risk considerations. This issue is still being pursued with the Environment Agency.
- 2.10 One of the key changes in the recent Regional Spatial Strategy for the East Riding was the elevation of Driffield in the settlement hierarchy to a Principal Town (from a Town in the Joint Structure Plan) in recognition of its role and function as a larger urban area in the northern part of the East Riding.
- 2.11 The Hull housing market area (see paragraph 2.2 above) is defined by the Gateway Housing Market Renewal Pathfinder as being that set out in Appendix B. This area is not consistent with either the Central and Eastern Joint Structure Plan sub areas or the Beverley and Holderness Local Plan areas. The Hull housing market area represents the Central sub area (less the North Cave, Hotham and Brandesburton Parishes, but with the Etton, Dalton Holme, Middleton, Lund and Lockington Parishes) and the Southern portion of the Eastern sub area (including the towns of Hornsea and Withernsea).
- 2.12 If the Central Joint Structure Plan sub area's previous provision figure (of 400) and half of the Eastern Joint Structure Plan sub area's figure (of 200) was notionally allotted as the Hull Housing Market area, then this suggests the provision in this Hull Housing Market area would be around 500. 40% of the East Riding's total Regional Spatial Strategy housing provision of 1,150 dwellings would be 460 dwellings per annum, which approximates to (but is less than) the

500 figure. This would suggest that part of the increase in the East Riding's level of new housing provision should not be directed to the Central Joint Structure Plan sub area or southern portion of the Eastern sub area. If it was, then that would only add to the existing provision of around 500 dwellings which might risk prejudicing the Regional Spatial Strategy's requirement that around 40% of the East Riding's housing provision should be within the Hull housing market area (see paragraphs 2.2 to 2.4 above).

- 2.13 It is therefore proposed that in distributing the East Riding's additional housing provision of 100 houses per annum arising from the Regional Spatial Strategy, the previous Joint Structure Plan figures be amended as set out below:

Table 1: Revised net housing completion numbers by Joint Structure Plan (JSP) sub area

JSP sub-area	Previous JSP annual housing requirement	Revised annual net housing requirement	Principal reasoning
Northern	200	225	Requirement increased to acknowledge Drifffield's elevation in the settlement hierarchy to a Principal Service Centre, 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 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.
	1,050	1,150	

- 2.14 The Council has been applying the policy and advice from PPS3, the Regional Spatial Strategy and its own Joint Structure Plan on directing a greater proportion of housing development to suitable locations³ with greater rigour. This has led to a number of proposals for development in rural settlements being refused that might at one time have been approved. Whilst this will not affect the development of sites with consent or already released, it is important that the allowances made in the housing supply calculations for unidentified small sites are robust and are kept under close review in order to take this factor into account.
- 2.15 The Secretary of State also did not allow the Council to 'save' three of the four Local Plan policies on Affordable Housing from September 2007 onwards⁴. The Council has therefore introduced an Interim Approach on Affordable Housing to reflect the high priority placed in PPS3 and the Regional Spatial Strategy on meeting the needs of those who are unable to afford market housing. The Interim Approach sets a requirement that developments of 15 or more

³ Identified in paragraph 10 of PPS3 as those locations that offer a good range of community facilities and with good access to jobs, key services and infrastructure

⁴ See Secretary of State's Directions on 'Saved Policies' at www.eastriding.gov.uk/planning/forwardplanning

dwellings (or sites of 0.5 hectares or more) must make provision for a 40% element of affordable housing. It should be noted that the majority of housing developments in the East Riding fall below this threshold and it is proposed that a further paper be submitted for consideration.

- 2.16 However, it does allow for evidence to be submitted supporting a case where an applicant contends that the economics of provision on a particular site would make that level of affordable housing unviable. Whilst it is accepted that this requirement will affect a landowner's return from the development of a housing site affected by the Approach, the ability for evidence on viability to be submitted should not lead to a situation where reasonable levels of return cannot be made and so precluding available sites from coming forward.

3. House completions

Numbers completed in 2007

- 3.1 Table 2 below sets out the number of house completions in each of the four Joint Structure Plan sub areas in the 2007 financial year (ie 1 April 2007 to 31 March 2008). These numbers are compared with the revised annual housing provision requirement for each of the Joint Structure Plan sub areas as set out in Table 1 above. A calculation has also been made of the completions in the East Riding portion of the Hull housing market area (from a compilation of the individual Parish statistics), which is also set out below.

Table 2: Net housing completion numbers in 2007

JSP sub-area	Number of houses completed 2007	Revised annual housing requirement (see Table 1 above)	Completions as a % of the requirement
Northern	403	225	179%
Central	706	400	177%
Eastern	218	250	87%
Western	224	275	81%
Total	1,551	1,150	135%

ER portion of Hull housing market area	780	460	170%
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- 3.2 The Table shows that in the East Riding there was an overall 35% over-provision in the housing numbers compared with the strategic housing requirement set out in the Regional Spatial Strategy. This involved over-provisions of 79% and 77% in the Northern and Central sub-areas respectively. However there was an under-provision in the Eastern and Western sub areas, where there was a shortfall of 13% (32 houses) and 19% (51 houses) respectively.
- 3.3 The completion figures are compiled from the final certificates submitted by this Council, the National Home Builders Council and other inspectors. The completion date is taken as the date of the final inspection, as set out on the certificate. The East Riding Home Builders Group have conducted their own survey and agreement has been reached to verify the number of completions.

- 3.4 780 houses were completed in the East riding part of the Hull housing market area in 2007. This was an over-provision of 70% (320 houses) above the 460 houses that would represent 40% of the East Riding's overall housing provision (see para. 2.2 above).

Numbers completed since 2004

- 3.5 The 2007 figures are compared with those previous years since the Regional Spatial Strategy's 2004 base date in Table 3 below. The completion figures in the East Riding portion of the Hull Housing Market area since 2004 are also set out.

Table 3: Annual net housing completions 2004 to 2007 by Joint Structure Plan Sub-Area

Year	2004	2005	2006	2007
Northern	407	302	242	403
Central	463	547	448	706
Eastern	274	232	517	218
Western	230	184	184	224
Totals	1,374	1,265	1,391	1,551
Completions in ER portion of the Hull housing market area	503	573	526	780

- 3.6 It is interesting to note that house completions for 2007 increased in three of the four sub areas, resulting in the largest number of completions since 2004. Only in the Eastern sub area did the number reduce, from the extremely high figure in 2006. The Table highlights the high levels of completions in the Central and Northern sub areas in 2007 in comparison to the three previous years. Completions in the Western sub area showed a welcome increase on the 2005 and 2006 figures. Overall, the table shows that the total number of completions in the East Riding has been substantially above the total Regional Spatial Strategy housing requirement figure of 1,150 in each of the four years.

It should be noted that there is a significant downturn in planning applications for residential development and this may continue for a number of years.

- 3.7 The 780 completions within the Hull housing market area in 2007 was significantly above the level in each of the three previous years in the Regional Spatial Strategy's period.
- 3.8 Government guidance advises that local planning authorities should manage housing delivery to ensure performance is achieved in line with the housing and previously developed land trajectories. While there may be a variation in the level of delivery from year to year, it is important that the overall delivery levels set for the plan period are being met and any management actions should reflect the degree to which actual performance varies from expected performance.
- 3.9 In order to help gauge actual performance, Table 4 below gives the total number of houses that have been completed in each of the four Joint Structure Plan sub areas in the four years of 2004 to 2007 compared with the total strategic housing requirement as set out in the Regional Spatial Strategy.

Table 4: Housing completion numbers between 2004 and 2007

JSP sub area	Total number of houses completed 2004 - 2007	RSS requirement for 2004 - 2007	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
ER portion of the Hull housing market area	2,382	1,840	+542	+29

3.10 This table illustrates that across the East Riding there was an over-provision of 21% (981 houses) in the first four years of the recently published Regional Spatial Strategy period. The performance varies in the sub areas, with a considerable over-provision over the last four years of 50% (454 houses) in the Northern sub area and 35% (564 houses) in the Central sub area. However in the Western sub area, there was an under-provision of 25% (278 houses).

3.11 2,382 houses were completed in the East Riding portion of the Hull Housing Market area in the last four years. This represents 29% over the Regional Spatial Strategy's expectation that "around 40%" of the East Riding's housing provision (1,840 houses) should be within that area. This is above the East Riding average and supports the proposal in Table 2 above that the Central sub area should not be apportioned a share of the East Riding's increased housing provision from the recent Regional Spatial Strategy.

% of completions on previously developed land

3.12 One of the key objectives of managing the release of residential sites is to maximise the proportion of dwellings built on 'recycled' land. Analysis of the housing completions in 2007 shows that 50% were on previously developed land. As shown in Table 5, this is a decrease compared with the peak of 57.7% recorded last year, but it is still a substantial increase from the levels before the IPG was introduced.

Table 5: Proportion of houses completed on previously developed land, 2001 to 2007

	2001	2002	2003	2004	2005	2006	2007
Proportion of completions on previously developed land (%)	20.1	18.3	32.0	49.6	43.6	57.7	50.0

3.13 Government advice in PPS3 makes it clear that the re-use of previously developed land is a key objective and sets a national target of 60%. However in recognition of the area's nature, the Joint Structure Plan previously set a target that 'at least 30% of new dwellings in the East Riding should be on previously developed land and buildings'. This has now been superseded by a new brownfield target and policy approach in Regional Spatial Strategy. Whilst this new regional target is 65%, it is recognised that "because of the diversity of the Region, there is likely to be significant differences in what is achieved in different districts". It expects Local

Development Frameworks to set local targets and include a strategy for bringing previously-developed land into housing use.

- 3.14 Whilst it is recognised that it will be difficult for rural authorities such as the East Riding to achieve such high recycling levels as 60% or 65%, it should not lead to a diminution in the commitment to maximise the proportion, providing that this does not conflict with other material considerations (e.g. the need to prevent development in unsustainable locations or to maintain an appropriate supply of employment land).

Previously developed windfall sites

- 3.15 An analysis has been made of the numbers of dwellings granted permission on previously developed windfall⁵ sites over the last five years (2003 to 2007). These are set out in Table 6 below. They give an updated basis to that used in the original IPG for estimating the number of dwellings that may be granted consent on such sites in addition to those already identified in the 2007 Housing Land Position Statement. By restricting the calculation to previously developed sites only, it ignores any consents granted on the ‘pragmatic exception’ sites that dealt with separately in paragraph 3.20 below.

Table 6: Dwellings granted on previously-developed windfall sites 2003 to 2007

Sub area	2003 IPG allowance (pa)	2003	2004	2005	2006	2007	Totals	Average
Northern	25	196	182	247	94	72	983	164
Central	50	297	127	356	240	140	1,346	224
Eastern	30	119	243	225	118	80	873	146
Western	15	79	96	138	46	70	473	79
Total	120	691	648	966	498	362	3,665	611

- 3.16 The Table shows that the total number of dwellings granted on these previously developed windfall sites in each of the Joint Structure Plan sub areas has been significantly higher than that allowed for in the adopted IPG in all five years. The average of the total granted each year (611) is over 5 times that allowed for in the original IPG (120).
- 3.17 It is expected that previously developed windfall sites will continue to come forward in the East Riding’s major settlements (and occasionally in rural settlements despite the increased restrictions placed on residential development there, paragraph 2.14 above refers). Such sites will still make a substantial contribution to the East Riding’s future housing development.

Previously developed small sites

- 3.18 An analysis of the completions on previously developed small⁶ sites in the five years 2003 to 2007 is set out in Table 7 below. It gives an updated basis to that used in the original IPG for estimating the completions that may be achieved on such sites. These would be completions in addition to those already identified in the Housing Land Position Statement. By restricting the calculation to previously developed sites only, it eliminates any distortion in the calculations from completions on Greenfield sites through ‘old’⁷ consents and any ‘pragmatic exceptions’.

⁵ Those sites not allocated in the Local Plan but involve 0.25 hectares or more or involve 5 dwellings or more

⁶ Those sites not identified in the Housing Land Position Statement that involve less than 0.25 hectares or 5 dwellings.

⁷ Consents granted prior to the introduction of the restrictions on the release of greenfield sites.

Table 7: Annual dwelling completions on previously developed small sites 2003 to 2007

	<i>Amended IPG allowance (pa)⁸</i>	2003	2004	2005	2006	2007	Totals	Average
Northern	40	40	52	62	67	43	264	53
Central	40	33	70	49	59	47	258	52
Eastern	45	40	45	20	41	43	189	38
Western	20	10	28	35	16	18	107	21
Total	145	123	195	166	183	151	818	164

3.19 The overall number of completions on previously developed small sites in 2007 was above the amended IPG allowance (151 compared with 145). However, last year saw marginal under provisions in the Eastern and Western sub-areas (43 and 18 completions compared with allowances of 45 and 20 respectively), and an over provision in the Northern and Central sub-areas (43 and 47 completions respectively compared with an allowance of 40). The amended allowances are still a reasonable assessment based on the averages over the last five years, and they will be kept under review in future.

Pragmatic exceptions

3.20 Members will recall that as part of the Managed Release approach there are a number of 'pragmatic exceptions' to a complete moratorium on Greenfield development. The number of applications and dwellings that have been approved under each exception in 2006 are set out in Table 7 below, alongside those granted in 2003 (which was the first year of such exceptions), 2004 and 2005.

Table 8: Number of applications and number of dwellings approved on the 'pragmatic exceptions' in 2007 (compared with 2006, 2005, 2004 and 2003)

	2003		2004		2005		2006		2007	
Pragmatic exception type (IPG para 55)	No. of Apps	No. of houses	No. of Apps	No. of houses	No. of Apps	No. of houses	No. of Apps	No. of houses	No. of Apps	No. of houses
A) Completion of largely developed sites	12	40	7	54	7	26	4	44	1	11
B) Wholly affordable housing	0	0	0	0	0	0	0	0	1	20
C) Housing for special housing needs	0	0	0	0	0	0	0	0	0	0
D) Infilling	15	21	16	31	8	15	3	6	2	2
E) Essential to mixed use development	0	0	0	0	0	0	0	0	0	0
F) Re-use and adaptation of rural buildings	12	20	9	10	8	13	6	8	1	2

⁸ The small sites allowance figure was amended as part of the third annual update.

G) Redevelopment of agricultural buildings	3	31	11	117	5	35	0	0	1	1
TOTALS	42	112	43	212	28	89	13	58	6	36

3.21 This table shows a further reduction in the number of applications approved as pragmatic exceptions and, more significantly, a reduction in the number of dwellings approved compared to the previous year. The figure of 36 dwellings represents 2.3% of the total housing completions in 2007.

3.22 No applications have been approved for categories C or E in any of the last five years. The first application for an wholly affordable housing proposal on a Greenfield site since 2003 (20 dwellings at Stamford Bridge) was approved. Otherwise, the most significant exception type in 2007 was category A, which included an application for 11 dwellings to complete a largely developed site in Driffild. Exception types D, F and G involved relatively small numbers of dwellings in 2007. Although proposals for such 'pragmatic exceptions' are likely to still come forward and be approved, no account is taken of them in the calculation of the future housing supply in section 4 below.

4. Housing Supply

4.1 The housing supply position in each of the four JSP sub areas at 1 April 2008 is derived from the housing land information⁹. PPS3 states that local planning authorities should draw on the information from Housing Land Availability Assessments and other relevant evidence to identify sufficient specific deliverable sites to deliver housing in the first five years. To be considered deliverable, sites should be:

- available (the site is available now),
- suitable (the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities), and
- achievable (there is a reasonable prospect that housing will be delivered on the site within five years).

The Council is well under way with the preparation of its Strategic Housing Land Availability Assessment that will deal with these various matters, but this involves a considerable amount of work and it is not expected to be completed until December 2008. In the meantime, these matters on the deliverability of sites are dealt with as part of the discussions with the East Riding Home Builders Group over the Council's annual Housing Land Position Statement and an agreed list of deliverable sites is set out in that Statement.

4.2 The schedules of the sites for the four sub areas have been placed in Group offices and public deposit points¹⁰. The final four columns in each schedule show the:

- number of houses on sites with planning permission where development had commenced;
- number of houses on sites with planning permission where development had not yet commenced;
- area (hectares) of previously developed land that would be identified in the 2008 Housing Land Position Statement that did not have planning consent; and
- area (hectares) of Greenfield land that would be identified in the 2008 Housing Land Position Statement that did not have planning consent.

⁹ Housing Land Position Statement that is published annually following discussion with representatives of the house building industry.

¹⁰ Schedules of the sites involved are also available on request from Asset Strategy.

- 4.3 The number of houses that could be expected to come forward on the sites in the first three categories (i.e. excluding the Greenfield sites) is then combined with those that can be expected to be developed on small previously developed sites to give the total supply.
- 4.4 Completions on previously developed windfall sites make a significant contribution to the number of housing completions in the East Riding (see paragraphs 3.15 to 3.17 above) and, although the increased restrictions being placed on residential development in rural settlements may reduce them, the detailed monitoring undertaken indicates that there is no suggestion that they are likely to cease. Nevertheless, the Department for Communities and Local Government (DCLG) has insisted that an allowance for such sites should no longer be included unless there are genuine local circumstances that prevent specific sites from being identified. They have indicated that windfall sites should only be included in the supply in special circumstances, such as where it is difficult to identify land for housing or from information in strategic housing land availability assessments.
- 4.5 The East Riding does not have such ‘special circumstances’ to justify an allowance for previously developed windfall sites, but as mentioned above such sites will continue to come forward and add to the supply. This will therefore give additional flexibility in the supply calculations and robustness to the Council’s approach. However a number of windfall sites have already been granted planning consent since 1 April 2008 and therefore an allowance for these may be added to the supply calculations.
- 4.6 However, the Government has indicated that an allowance may still be made for ‘small’ sites and that account should be taken of previous years’ performances (past under-/over-provision) in making the calculation of the annual average number of net additional dwellings needed to meet the area's overall housing requirements (the ‘housing trajectory’) ¹¹.
- 4.7 Many of these small sites already have planning consent but they are not specifically identified in the Housing Land Position Statement as they fall below its threshold of 0.25 hectares or 5 dwellings. The Council has a detailed record of those sites with consent and the rate at which previously developed small sites have come forward, and has made robust future allowances for them (see paragraphs 3.18 and 3.19). These allowances are kept under review as part of this annual review and adjustments will be made if necessary to take account of changes in policy.
- 4.8 The levels of past under-/over-provision have previously been very significant for the East Riding given the substantial past over provision in three of the Joint Structure Plan’s sub areas against its housing targets since its 1998 base date. However, much of this over-provision will now be disregarded as a result of the change in the base date for the calculation of the trajectory following the publication of the Regional Spatial Strategy (see para. 2.1 above).
- 4.9 Previous annual updates of this policy guidance have led to the release of major Greenfield sites in the Western Joint Structure Plan sub-area (see paragraphs 1.4 and 1.5). Since those releases in December 2005, October 2006 and September 2007, development has commenced on two sites (S16C and S16H) and applications have been approved on a further two sites (S16K and RC10). Applications have been submitted on a number of other sites and pre-application discussions are under way on others. There is only one site (S22G) where no development interest has yet been expressed to the Council. The capacity of these sites has been taken account of in the schedules mentioned in paragraph 4.2 above.
- 4.10 Table 9 below shows the housing supply position in each of the Joint Structure Plan sub-areas and is based on Table A in the adopted IPG.

¹¹ Local Development Framework Monitoring: A Good Practice Guide, Office of the Deputy Prime Minister, 2005

4.11 However, the DCLG has indicated as part of the implementation of the advice in PPS3 that the Council should be able to demonstrate there is a 5 year supply of deliverable land for housing at any time during that five-year period. This suggests that in fact a 6 year supply should be allowed for so the supply does not fall below the 5 year delivery requirement in the subsequent year (when the next annual update is conducted). The Table therefore illustrates the supply for the 6 year period 2008 to 2013 (1 April 2008 to 31 March 2014). It also now only includes an allowance for those windfall sites that have been granted consent between 1 April 2008 and 31 August 2008. It does not include an allowance for future windfall sites (paragraph 4.4 above).

Table 9: Housing supply position within Joint Structure Plan Sub-Areas and East Riding portion of the Hull Housing Market Area (HHMA) from April 2008

Sub area	Northern	Central	Eastern	Western	Totals	ER part HHMA
Sites with consent and started	277	587	553	194	1,611	862
Sites with consent but not started (70% of total capacity)	260	389	218	1141	2,008	477
Brownfield land in HLPS without consent (50% of total capacity)	29	94	35	36	194	97
Brownfield small sites allowance ¹²	240	240	270	120	870	300
Sites granted consent since 1 April 2008 (70% of total capacity)	29	84	29	29	171	108
Total April 2008 supply	835	1,394	1,105	1,520	4,854	1,844

4.12 Table 10 below gives the total supply compared with the expected future rate of housing delivery. The DCLG has emphasised authorities should use a ‘housing trajectory’ in making the calculation of the future rate of housing delivery that should take account of previous years’ performances since the Regional Spatial Strategy’s base date (see para 4.8 above).

4.13 A calculation of the future rate of housing delivery for each of the four Joint Structure Plan sub-areas is set out in Appendix C. This sets out a ‘residual annual build rate’ by subtracting the net number of housing completions in each sub area since 2004 from the total housing requirement over the whole Regional Spatial Strategy period (to 2026), and then dividing that figure by 19 (the number of years remaining to 2026). The residual annual build rate is then multiplied by 6 to assess the total housing numbers to be provided to ensure that a 5 year housing supply is retained (even near to the end of the first year at 31 March 2009). Table 10 below represents an updated version of Table B in the adopted IPG. The table shows the number of years provision that the existing housing supply would represent and the number of houses to be released to ensure the 5 year housing supply is retained.

¹² 6 years x annual allowance (as set out in table 7).

Table 10: Housing delivery requirement and supply position for the JSP sub areas and East Riding portion of the Hull Housing Market Area (HHMA)

Sub area	Northern	Central	Eastern	Western	ER part HHMA
Housing delivery requirement figure to 2008-13 (residual annual build rate x 6)	1,207	2,222	1,424	1,738	2,589
Total supply at April 2008 (see Table 9)	835	1,394	1,105	1,520	1,844
Number of years supply at April 2008	4.2	3.8	4.7	5.2	4.3
Number of additional houses to be released to achieve the requirement figure	372	828	319	218	745

- 4.14 The table highlights that land for additional housing development will need to be released in all of the four Joint Structure Plan sub areas in order to provide for a 5 year housing supply that meets the new housing trajectory. This involves capacity for 828 houses in the Central, 372 in the Northern, 319 in the Eastern and 218 in the Western sub areas respectively.
- 4.15 This is a fundamental change from previous updates when only sites in the Western sub area have been released. This illustrates the significant effect the adoption of the Regional Spatial Strategy has had. This is not just from the increase to the overall housing annual provision requirement (which was increased to 1,150 from 1,050), but mainly from the revisions to the housing trajectory (principally arising from the disregard paid to the housing over-provision between the Joint Structure Plan's 1998 base date and the Regional Spatial Strategy's 2004 base date as well as the Regional Spatial Strategy's 2004 end date of 2026).
- 4.16 Table 10 also indicates that capacity for a further 745 houses needs to be released to meet the requirement for the Hull Housing Market Area. However, this will be more than met by the need to release 828 houses in the Central Joint Structure Plan sub area (which apart from the North Cave, Hotham and Brandesburton Parishes is wholly within the Hull Housing Market Area – see para. 2.11 above). The release of further capacity in the southern portion of the Eastern Joint Structure Plan sub area would therefore compound an 'over-provision' in the Hull Housing Market Area once the deficit in the Central Joint Structure Plan sub area requirement is met.

5. Discussion

- 5.1 Government advice in PPS3 states their objective is *“to ensure that the planning system delivers a flexible, responsive supply of land”* and as part of their principles of 'Plan, Monitor, Manage' *“Local Planning Authorities should develop policies and implementation strategies to ensure that sufficient, suitable land is available to achieve their housing and previously-developed land delivery objectives.”*
- 5.2 The Council's IPG on Managed Release is a key tool in the Council's policy and implementation strategy to deliver the above objective pending the Local Development Framework. It is also recognised as a crucial part of the role this Council plays in supporting the City of Hull's regeneration through the Housing Market Renewal Pathfinder initiative.

5.3 The actions the Council needs to take to manage delivery of an appropriate pattern and speed of housing development and recycling level in the light of the latest policy situation set out in section 2 above and the actual performance on the house completion and supply position set out in sections 3 and 4 above is discussed below.

Pattern of urban growth

5.4 The Regional Spatial Strategy and the Joint Structure Plan set out the locational principles and strategy for housing development in the East Riding. Together they:

- establish the four sub-areas and their respective priorities for housing distribution, and
- identify those settlements that are to be the focus of most development.

5.5 The JSP sets out the following approach for housing provision in each of the four sub-areas (see Plan at Appendix A):

- a **Northern** sub-area that is largely rural based on the Vale of York and parts of the Yorkshire Wolds where there will be a reduced level of development to achieve a slower rate of growth;
- a **Central** sub-area that surrounds, and is heavily influenced by, the City of Hull where development will be focused on the City to support urban regeneration initiatives there;
- an **Eastern** sub-area including the whole of the coastal strip from Flamborough Head to Spurn Point where development will be maintained to support regeneration and market renewal in the absence of any likely significant employment growth; and
- a **Western** sub-area based on the port of Goole and surrounding towns where there will be increased development in response to the strategic economic and regeneration focus on the area.

5.6 Together, the Regional Spatial Strategy and Joint Structure Plan set out the higher levels of the area's settlement hierarchy and, as mentioned in paragraph 2.14 above, housing development is now focused on these limited number of settlements. They are:

- the separate settlements of Cottingham, Anlaby/Willerby/Kirkella and Hessle which are identified, together with the City of Hull itself, as the 'Regional City' (Regional Spatial Strategy policy YH4);
- Beverley, Bridlington, Driifield and Goole which are identified as Principal Towns (Regional Spatial Strategy policy YH5); and
- Elloughton/Brough, Hedon, Hornsea, Howden, Market Weighton, Pocklington, Snaith and Withernsea which are identified as Towns (Joint Structure Plan policy DS3).

5.7 The Council published a Preferred Options version of a 'Smaller Settlements' Development Plan Document for public consultation in October 2006. This proposed a number of 'Market Villages' from the large number of other settlements in the East Riding that were assessed as having more sustainable characteristics than others. As such, these were identified as those locations where limited development would be allowed to meet local needs under policy DS4 of the Joint Structure Plan. However, because of Government expectations on the content of Local Development Framework Core Strategies, this Document is not being progressed further and its provisions will be reconsidered as part of the emerging Core Strategy.

5.8 A substantial number of houses benefit from extant consents granted under the previous approach and will continue to be completed outside the settlements mentioned in paragraph 5.6. However, it is important that a more concentrated pattern of development is implemented when possible through the determination of planning applications, the preparation of the Local

Development Framework documents and the review of the mechanism for the release of sites through this report.

- 5.9 The Regional Assembly has also commented on development within the Hull Housing Market Area that:

“It is important to ensure that the Council’s monitoring systems record where within the Housing Market Area development is taking place so that the systems can demonstrate whether the development taking place is in locations that are supporting the delivery of the outcomes of the Regional Spatial Strategy’s Core Approach and Sub Area policies. In particular, that most development is taking place within or on the edge of the Regional City and secondly in the Principal Town of Beverley, with only limited development in smaller settlements to support the local needs of those places.”

Speed of urban growth

- 5.10 Table 4 shows that development rates over the first four years of the Regional Spatial Strategy have been significantly above the strategic housing requirement in the Northern and Central Joint Structure Plan sub-areas - 50% and 35% respectively. Only in the Western sub-area have completions been below the requirement (-25), but that is almost equal to the over-provision in the Eastern sub area (24%). There has been an overall over provision of 29%.
- 5.11 However, the completions in individual years show considerable variation for the four individual sub areas and this is a relatively early stage in the life of the new Regional Spatial Strategy. In addition, the calculation of the future supply from the housing trajectory takes account of the over-/under-provision in the various sub areas.
- 5.12 The insistence by the DCLG that an allowance should not be made for windfall sites (paragraph 3.4 above) remains a concern. Monitoring shows that such sites have made a substantial contribution to housing completions in the East Riding and to the increased recycling of land. Not allowing for windfall sites in the housing supply calculations has increased the need to release Greenfield sites to ensure a suitable housing supply. This is of particular concern in the Hull Strategic Housing Market area where a tight control of the housing supply has traditionally been a key element in the Council’s support for the (DCLG led) Gateway Pathfinder initiative to regenerate the City of Hull’s housing market. The release of Greenfield sites will also lead to the Council’s proportion of dwellings completed on previously developed sites reducing, which would be counter-productive to advice in PPS3 on ‘making effective use of land’. However, once such a windfall site has obtained planning permission it can be included within the next update (and therefore may reduce the number of allocated sites to be released in future years).
- 5.13 Whilst the non-allowance for windfall sites remains a concern, its impact on the housing delivery requirement has been reduced by the DCLG’s encouragement of past under-/over-provision in housing completions to be taken into account in the housing trajectory calculation. However, these trajectories have increased significantly in some areas because the past over-provision in house completions in some of the sub areas since 1998 that were previously taken account of (particularly in the Northern and Eastern sub areas) will now be disregarded.
- 5.14 The number of consents being granted on previously developed small sites (Table 7) will assist in achieving the housing delivery requirement and realistic account needs to be taken of the likely rate of completions (see paragraph 4.7). A comparison is made each year of the allowance for each of sub-area with those originally set out in the IPG to ensure it remains robust.
- 5.15 The number of dwellings granted on windfall sites (362), completed on small sites (151) and granted on the pragmatic exceptions (6) in 2007 represents a substantial proportion of the housing delivery requirement. This is a substantial reduction on the equivalent figures in 2006

and 2007. Whilst there might not be any objection to these sites individually against the Council's present IPG approach, high levels would be a concern as it might risk the Council's ability to control the speed of urban growth. It is also important that the existing 'pool' of consents is not added to unnecessarily by consents on inappropriate non-allocated sites.

- 5.16 Whilst Planning Policy Statement 3: Housing (PPS3) expects local authorities to maintain a five year supply of deliverable sites (see para 4.1), it is clear from DCLG advice that a 6 year supply should be allowed for so the supply should not fall below the 5 year delivery requirement in the subsequent year (paragraph 4.13 above).
- 5.17 Table 10 shows the level of supply in the each of the four sub-areas at 1 April 2008 is insufficient in comparison with the housing delivery requirements, ranging from 3.6 years in the Central sub area to 5.2 years in the Western sub area. It is therefore proposed that major Greenfield sites will need to be released in all of the sub areas as part of this update. Table 10 also shows that in order to meet the housing delivery requirement the number of houses to be released in each of the sub areas is as follows:
- Northern – 372
 - Central – 828
 - Eastern – 319
 - Western – 218

Site release – considerations in principle

- 5.18 The Council has prepared a methodology¹³ that sets out the way it will assess and compare the suitability of potential housing sites. Whilst this was prepared primarily to help the consideration of sites as part of the preparation of the Local Development Framework Housing Development Plan Document, it serves as the most up-to-date means of assessing the suitability of sites for release as part of this annual update.
- 5.19 The methodology assesses potential sites against various considerations. It does this in a number of stages that act as a sieving process. The initial stage prioritises sites within or adjacent to settlements identified in the Joint Structure Plan settlement hierarchy and excludes those sites with principal environment or cultural constraints (e.g. conflict with international/national nature conservation designations or area at greatest risk from flooding or coastal erosion). It then assesses the site's proportion of previously developed land and accessibility credentials as Stage 2, before looking at such detailed site specific considerations such as biodiversity, landscape character and infrastructure issues at Stage 3 and developability and deliverability as Stage 4.
- 5.20 Whilst the Methodology does refer to the settlement hierarchy, the Yorkshire and Humber Assembly (who prepare the Regional Spatial Strategy and monitor development against it) have confirmed (with particular reference to the Hull Housing Market Area) the emphasis that they expect to be given to their Strategy's Core Approach and Sub Area policies. In particular, the balance of development to be directed to the Regional City, Principal Towns and elsewhere (see paragraph 5.9 above).

¹³ Housing Site Assessment Methodology, May 2007

- 5.21 The various Greenfield sites allocated in the Council's four adopted Local Plans that are located in the Regional City, Principal Towns, Towns and Smaller Settlements ¹⁴ and are, as yet, uncommitted have therefore been examined.
- 5.22 In addition, paragraph 44 of PPS3 does advise that as part of the Council's previously developed land strategies, they should consider whether sites that are currently allocated for industrial or commercial use could be more appropriately re-allocated for housing development in line with their housing trajectories. The PPS refers to the Government's advice on employment land reviews ¹⁵ when reviewing employment land. The objective of this guidance is to make sure that local planning authorities review their portfolios of employment sites and apply up to date and sensible criteria in terms of sustainable development and market realism.
- 5.23 Whilst the advice states that "Local planning authorities are encouraged to identify a robust and defensible portfolio of both strategic and locally important employment sites in their LDFs and, where appropriate, to safeguard both new and existing employment areas for employment rather than other uses" (paragraph 2.7), it then encourages employment land studies to review all existing or proposed employment sites to be consistently reviewed for their 'fitness for purpose' as employment sites and their alternative potential as housing sites.
- 5.24 The Council's Employment Land Review ¹⁶ has recommended that three existing employment allocations have potential for de-allocation. These are the sites at:
- Elloughton/Brough (Local Plan allocation In2b) – "potential to de-allocate or allow mixed use development"
 - Hedon (Local Plan allocation HED8) – "limited market appeal, over supply of general industrial land/wrong location for office development" and
 - Hornsea. (Local Plan allocations HRN4 and HRN6) – "not likely to be needed for employment use".
- 5.25 In addition, there is the major former Alamein Barracks 'Opportunity Site' site near to the Principal Town of Driffield. This is a previously developed site that is allocated in the Local Plan for a variety of uses (Local Plan allocations KELL4 to KELL7), which includes conversion for such uses as residential, office/research, tourist accommodation.
- 5.26 There have been Local Development Framework 'land bids' made for the Elloughton/Brough (for mixed use development), Hedon (for residential development) and the majority of the Alamein Barracks site (for mixed use development). These three sites have therefore been examined alongside the unreleased allocated Greenfield housing sites. However, the Hornsea sites lie in the southern portion of the Eastern Joint Structure Plan sub area where there is no need to release any further Greenfield sites at the present (paragraph 4.16 above). These sites have not therefore been considered at this stage.
- 5.27 These various allocated sites have been examined against various criteria in the Housing Site Assessment Methodology to assess their relative merit for release as part of this update. The schedules of the sites for the four sub areas have been placed in Group offices and public deposit points ¹⁷.

¹⁴ Regional City and Principal Towns as defined by the Regional Spatial Strategy, Towns as defined by the Joint Structure Plans and Smaller Settlements as defined by the Preferred Options Smaller Settlements Development Plan Document (see paragraph 5.7).

¹⁵ Employment Land Reviews: Guidance Note, ODPM, 2004

¹⁶ East Riding of Yorkshire Council Employment Land Review Stage 2 Final Report, April 2007

¹⁷ Schedules of the sites involved are also available on request from Asset Strategy.

Site release – Northern Joint Structure Plan sub area

- 5.28 Of the unreleased allocated Greenfield sites in the Northern Joint Structure Plan sub-area, there are two in Drifffield, the sub area's Principal Town, (Local Plan allocations DRIFF3 – Land east of New Walk and DRIFF4 – Land south of Bridlington Road) and five in the Town of Market Weighton (MARK5 – Land south of 43-73 Market Place, MARK7 – Land east of Aspen Close, MARK10 – Allotment Gardens, Hawling Road, MARK11 – Land north of Holme Road and MARK12 - Land south of Holme Road). There are no remaining unreleased allocated sites in Pocklington, the area's other Town. In addition, the Alamein Barracks Opportunity Site near to Drifffield (see paragraph 5.25), has also been considered.
- 5.29 The Council's Housing Land Position Statement of 1 April 2008 shows an existing supply of 252 houses on large sites in Drifffield, 149 in Pocklington and 79 in Market Weighton. It is not possible to release any further allocated sites in Pocklington, but it is considered that land should be released in both Drifffield and Market Weighton in the light of these respective levels of existing supply. Release in Drifffield will recognise its elevated status as a Principal Town and release in Market Weighton will redress the relatively low level of existing supply in the Town.
- 5.30 The total capacity of the two sites within Drifffield is 337 houses, the three sites in Market Weighton is 467 and Alamein Barracks is 810 (if it was all developed for housing), but there is only a need to release capacity for 372 houses in that sub area (see paragraph 5.17).
- 5.31 The assessment of the three sites in/near Drifffield using the Housing Site Assessment Methodology indicates that the DRIFF3 allocation performs better than both the DRIFF4 and the Alamein Barracks sites. This site has a capacity of 210 houses and there are no known major constraints to its development. Indeed, there is planning appeal pending against the Council's refusal of development for part of the allocation. This would increase the supply in Drifffield on large sites to 462 houses.
- 5.32 The relative performance of the five sites in Market Weighton against the Housing Site Assessment Methodology indicates that MARK5 to be the best. However, this site only has a capacity of 38 houses and this would be insufficient to meet the deficit in the supply area's supply nor add substantially to the Town's supply. The MARK11 site performs next best against the Methodology and this has a capacity of 257 houses. Whilst this will be a large site for the Town, its development will help deliver the MARK15 recreation allocation and highway improvements to the A1079, and a new health centre has also been offered. There are no known major constraints to the development of these two sites and in fact there have been recent planning applications for both sites.
- 5.33 It is therefore proposed that Local Plan allocations DRIFF3, MARK5 and MARK11 allocations be released to reach the required level of supply in the Northern Joint Structure Plan sub area.

Site release – Central Joint Structure Plan sub area

- 5.34 Of the unreleased allocated Greenfield sites in the Central Joint Structure Plan sub-area, there is only one in the Regional City, which is in Cottingham. (Local Plan allocation H1ap – Land south of Longmans Lane). There are a further two sites in the Principal Town of Beverley (Local Plan allocations H1aa – Land south of Keldgate and H1ac – Land east of Queensgate/ west of Victoria Road, Woodmansey). However, the total capacity of these sites is only 46 houses and there is a need to release a total capacity of 828 houses in the sub area (see paragraph 5.17)

- 5.35 There are no existing unreleased allocated Greenfield sites in the sub area's two Towns of Elloughton/Brough and Hedon, but there are the two existing employment allocations that have been recommended for de-allocation in the Council's 2007 Employment Land Review (see paragraph 5.24). These two sites have been assessed using the Housing Site Assessment Methodology and this indicates that they also perform better than other unreleased housing sites in the various Smaller Settlements in the sub area. The Elloughton/Brough site (Local Plan allocation In2b - Land south of Hull/Kings Cross railway/east of Skillings Lane) (as part of a mixed use development) and the Hedon site (Local Plan allocation HED8 – Land south of Hull Road) a capacity of 155 houses.
- 5.36 The Elloughton/Brough site, which largely involves previously developed land, has a potential housing capacity of more than the 825 houses required. Whilst the site has some development issues (such as access improvements and it lying partly in an area of high flood risk), the majority of the area proposed for housing lies outside the flood risk area and the landowners are keen to deal with the other matters. There is a reasonable prospect therefore that these issues will be resolved and housing development on the site would be achievable within five years as part of that mixed use development.
- 5.37 The Hedon site lies wholly in an area identified as at a high probability of flooding on the Environment Agency's Flood Map (Flood Zone 3). As such, it would be necessary to apply the Sequential Test as set out in PPS25¹⁸. This seeks to steer development to reasonably available sites of lowest flood risk first, with decision-makers only considering the suitability of sites in Flood Zone 3 where there are no reasonably available sites in Flood Zones 1 or 2. Given that sufficient capacity is available to meet the shortage in the sub area's housing requirement on other sites of lower flood risk, it would be difficult for this test to be met. This would raise a significant doubt over the site's deliverability.
- 5.38 It is therefore proposed that Local Plan allocations H1ap, H1aa, H1ac and In2b be released to reach the required level of supply in the Central Joint Structure Plan sub area.
- 5.39 It is suggested that a development brief should be prepared for the mixed-use development on the Local Plan allocation In2b site to deal with the phasing of development, the appropriate balance of uses on the site and the other planning issues likely to arise from its development.

Site release – Eastern Joint Structure Plan sub area

- 5.40 Of the unreleased allocated Greenfield sites in the northern portion of the Eastern Joint Structure Plan sub-area, there are three sites in Bridlington (BRID8 – Land east of Bempton Lane, BRID9 – Land west of Bempton Lane and BRID10 – Land north of Easton Road). The two Towns in the sub area (Hornsea and Withernsea) both lie in the southern portion of the sub area where there is where there is no need to release any further Greenfield sites at the present (paragraph 4.16 above).
- 5.41 The total capacity of the three sites in Bridlington is 675 houses, but there is only a need to release capacity for 319 houses (see paragraph 5.17). The assessment of the three sites using the Housing Site Assessment Methodology indicates that the BRID10 allocation performs better than the other two. This site has a capacity of 539 houses and there are no known major constraints to its development. It is not necessary therefore to consider the release of any additional major Greenfield sites to reach the required level of supply.

¹⁸ Planning Policy Statement: Development and Flood Risk, DCLG December 2006

- 5.42 The Council's Planning, Environment and Technical Services Committee adopted a development brief for the site on 8 July 1999 that set out the planning issues likely to arise from the development of the site. Whilst most of the brief's content remains valid, there are some of its provisions that have been overtaken by events or more recent guidance (e.g. the publication of PPS3 and Regional Spatial Strategy on Affordable Housing). It is therefore suggested that an addendum to the development brief be prepared to clarify any changes in the planning issues affecting the site's development.

Site release – Western Joint Structure Plan sub area

- 5.43 There are no unreleased allocated Greenfield housing sites in the Western Joint Structure Plan sub-area's Principal Town of Goole or either of its Towns of Howden and Snaith. The only remaining allocated Greenfield housing sites are in other settlements, of which three Gilberdyke, Newport and Rawcliffe were identified in the Council's Smaller Settlements Document (see paragraphs 5.7 and 5.21 above).
- 5.44 There are 2 sites in Gilberdyke (total capacity 24 houses), 3 sites in Newport (total capacity 241 houses) and 1 site Rawcliffe (41 houses). These are Local Plan allocations: S15D – Land east of Sandholme Road, Gilberdyke; S30A – North of High Street, Rawcliffe; S15C – North of Gilberdyke railway station; S25E – North of the B1230, Newport; S25B – Off Canal Side West, Newport; S25A – East of Thimblehall Lane, Newport.
- 5.45 The total capacity of the six sites in these settlements is 306 houses, but there is only a need to release capacity for 218 houses in that sub area (see paragraph 5.17). However, the largest of the six sites (132 houses on Local Plan allocation S25A in Newport) performs the least favourably against the Methodology, and so all six sites would need to be released to achieve the required level of supply.
- 5.46 It is therefore proposed that all six Local Plan allocations are released to reach the required level of supply in the Western Joint Structure Plan sub area.

Unallocated Greenfield sites

- 5.47 In view of the need to release a number of allocated Greenfield sites in certain settlements in the East Riding in order to meet the strategic housing requirement, it is necessary to consider the implications on how the Council should deal with proposals for Greenfield windfall sites that do not fall within the 'pragmatic exceptions' categories. Whilst it is still necessary to restrain their release it would be inequitable to preclude development on a windfall site in the respective settlement that performs better or equally as one of the released allocated sites solely on the grounds of the Managed Release Interim Policy Guidance.
- 5.48 It is therefore proposed as an exception to the prevailing approach as set out in the Council's adopted Interim Policy Guidance on the 'The Managed Release of Residential Development Sites', that applications for residential development on a Greenfield site in a settlement where an allocation has been released as part of this update, or an equivalent settlement in the settlement hierarchy in that sub area, and that site performs better or equally as one of the released allocated sites in that settlement (as tested by the Council's Housing Site Assessment Methodology) will be determined in accordance with the Development Plan and all other relevant material planning considerations.

Recycling target

- 5.49 The proportion of housing completions achieved on previously-developed land (sometimes referred to as 'recycled' or 'brownfield' land) in 2007 has shown a decrease following last year's highest recorded level. Nevertheless, the achieved figure of 50% is substantially above the 30% target set out in the Joint Structure Plan and is reasonable against the 60% national target and the new 65% Regional Spatial Strategy target given the rural nature of the East Riding.
- 5.50 However, the recommendation to release Greenfield development sites in all of the four Joint Structure Plan sub-areas will not assist the Council's ability to continue to meet and surpass these challenging national and regional targets.

6. Conclusion

- 6.1 The number of completions in the Northern and Central sub-areas once again exceeded the housing provision requirement for 2007 as revised to take account of the publication of the Regional Spatial Strategy in May 2008. The number of completions in the Eastern and Western sub-areas did fall short of the requirement in 2007 but, in total, there was a 35% over provision for the East Riding. There had been an overall 21% over-provision in the East Riding in the four years since the new Regional Spatial Strategy's base date.
- 6.2 Although the proportion of completions on previously developed land decreased to 50.0% in 2007 from 57.7% in 2006, it is still substantially above the levels of 18% to 20% before the IPG was introduced in 2003.
- 6.3 The level of existing housing supply has been reviewed in accordance with the recently published Regional Spatial Strategy, taking into account the area's revised strategic housing requirement and the new base and end dates for the 'housing trajectory'. This has led to a dramatic change to the East Riding's levels of future housing supply. As a result it has been necessary to release allocated sites in all of the four Joint Structure Plan sub areas in order to provide the required 5 years supply of housing land. The Council's Housing Site Assessment Methodology has been used to help assess the most suitable sites to release from those allocated sites available.

7. Recommendations and Reasons for Recommendations

It is recommended that:

- (a) in order to provide a 5 year supply of housing land the following allocated sites be released in the respective Joint Structure Plan sub areas in addition to those sites already released as part of previous annual updates:

Northern Joint Structure Plan sub area:

- DRIFF3 – East of New Walk/The Chase, Driffield
- MARK5 – South of 43-73 Market Place, Market Weighton
- MARK11 – North of Holme Road, Market Weighton

Central Joint Structure Plan sub area:

- H1ap – West of Longmans Lane, Cottingham
- H1aa – South of Keldgate, Beverley
- H1ac – East of Queensgate/West of Victoria Road, Beverley (Woodmansey parish)
- In2b – South of Hull/Kings Cross railway/east of Skillings Lane, Brough

Eastern Joint Structure Plan sub area:
BRID10 – North of Easton Road, Bridlington

Western Joint Structure Plan sub area:
S15D – East of Sandholme Road, Gilberdyke
S30A – North of High Street, Rawcliffe
S15C – North of Gilberdyke railway station
S25E – North of the B1230, Newport
S25B – Off Canal Side West, Newport
S25A – East of Thimblehall Lane, Newport

- (b) it is recognised that non allocated Greenfield sites may come forward for development that perform better or equally as well as a released allocated site in the same sub area when assessed against the criteria in the Council's Housing Site Assessment Methodology. These could involve sites in the following settlements in the respective sub areas: Northern - Driffield, Market Weighton and Pocklington; Central - Anlaby, Cottingham, Hessle, Kirkella, Willerby, Beverley, Elloughton/Brough and Hedon; Eastern – Bridlington; and Western – Goole, Howden, Snaith, Gilberdyke, Newport and Rawcliffe. In such circumstances the application will be determined in accordance with the Development Plan and all other relevant material planning considerations;
- (c) with the exception of recommendations (a) and (b), the prevailing approach to the release of residential development sites as set out in the Council's adopted Interim Policy Guidance (IPG) on the 'The Managed Release of Residential Development Sites' October 2003 be reaffirmed;
- (d) a development brief be prepared for the mixed use development on the In2b site south of Hull/Kings Cross railway/east of Skillings Lane, Brough to deal with the phasing of development, the appropriate balance of uses on the site and the other planning issues likely to arise from its development;
- (e) an addendum be prepared to the 2001 development brief for the BRID10 North of Easton Road, Bridlington site to clarify any changes in the planning issues affecting its development since that date; and
- (f) a further monitoring report be submitted to The Cabinet on the housing supply/completion position at the end of the 2008 financial year and on whether the prevailing approach to the managed release of residential development sites should be revised. This should include particular attention to the progress made with the development of those sites referred to in (a) above.

Barry Adams
Director of Corporate Policy and Strategy

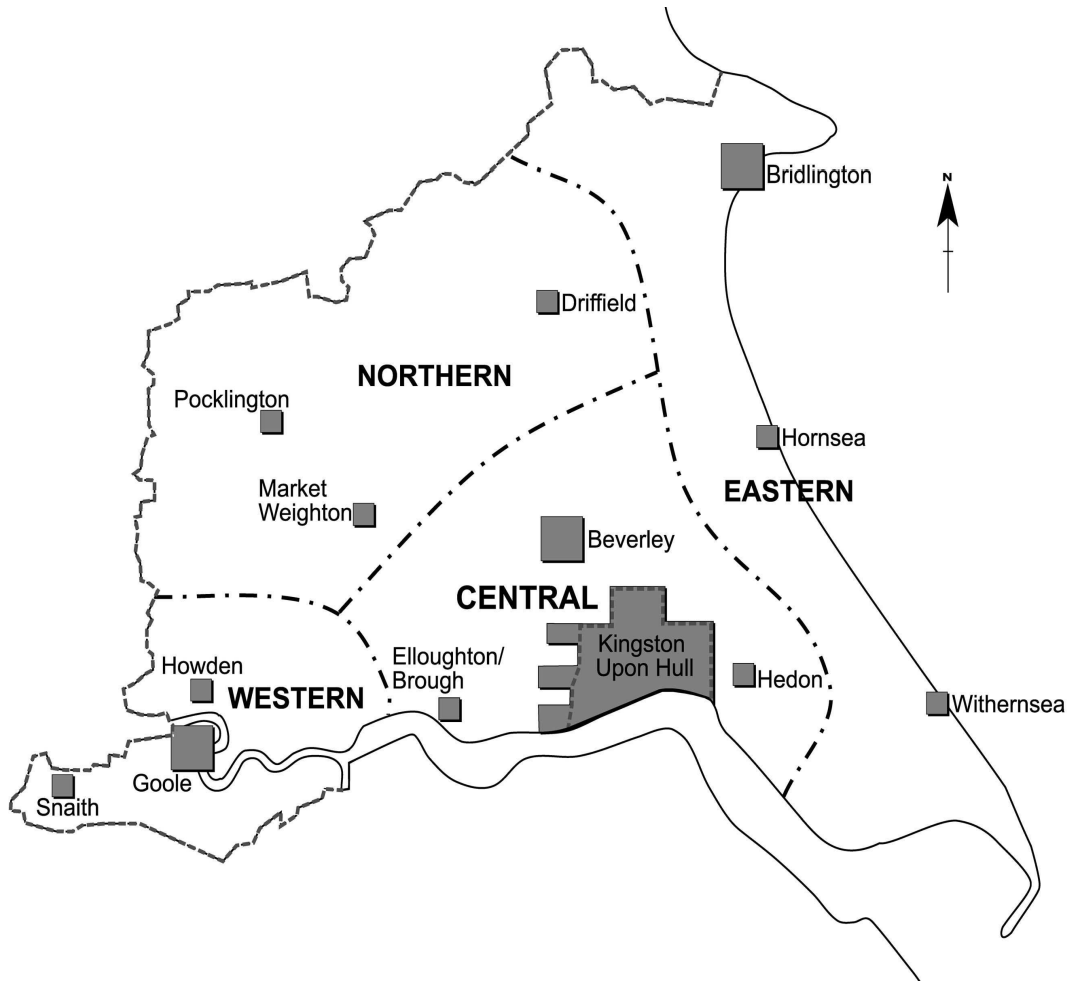
Contact Officer: Kristan Livingston
Head of Asset Strategy
Telephone Number: 01482 393900
E.mail: kristan.livingston@eastriding.gov.uk

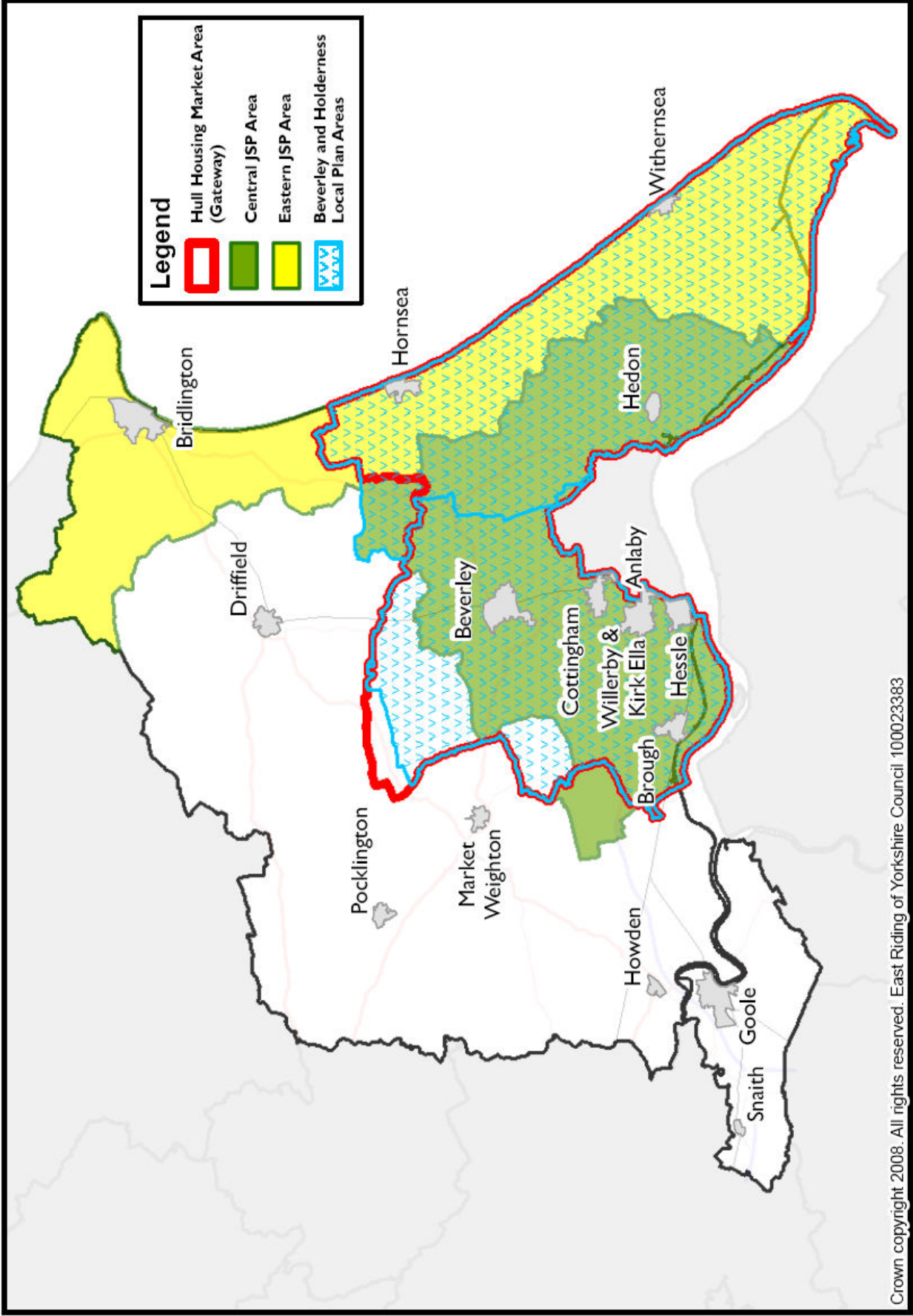
Contact Officer: Pete Ashcroft
Forward Planning Manager
Telephone Number: (01482) 391737
E.mail: Pete.ashcroft@eastriding.gov.uk

Background Papers

1. Interim Policy Guidance on the Managed Release of Residential Development Sites, October 2003.
2. Planning Policy Statement 1 'Delivering Sustainable Development', 2005
3. Planning Policy Statement 3 'Housing', 2006
4. Regional Spatial Strategy, the Yorkshire and Humber Plan (RSS12), 2008
5. Joint Structure Plan for Hull and the East Riding, 2005 (as 'Saved' by the Secretary of State's Direction)
6. Previous reports to Cabinet on the annual update on the position with the 'Managed Release of Residential Development Sites'

Joint Structure Plan Areas in the East Riding





Housing trajectory calculations by JSP sub-area

Appendix C

Northern

	Gross completions	Net completions	RSS annual requirement	Residual Annual Build Rate
2004	442	407	225	
2005	338	302	225	
2006	282	242	225	
2007	420	403	225	
2008			225	201.1
2009			225	201.1
2010			225	201.1
2011			225	201.1
2012			225	201.1
2013			225	201.1
2014			225	201.1
2015			225	201.1
2016			225	201.1
2017			225	201.1
2018			225	201.1
2019			225	201.1
2020			225	201.1
2021			225	201.1
2022			225	201.1
2023			225	201.1
2024			225	201.1
2025			225	201.1
2026			225	201.1
T total	1,482	1,354	5,175	3,821

Central

	Gross completions	Net completions	RSS annual requirement	Residual Annual Build Rate
2004	503	463	400	
2005	580	547	400	
2006	503	448	400	
2007	753	706	400	
2008			400	370.3
2009			400	370.3
2010			400	370.3
2011			400	370.3
2012			400	370.3
2013			400	370.3
2014			400	370.3
2015			400	370.3
2016			400	370.3
2017			400	370.3
2018			400	370.3
2019			400	370.3
2020			400	370.3
2021			400	370.3
2022			400	370.3
2023			400	370.3
2024			400	370.3
2025			400	370.3
2026			400	370.3
Total	2,339	2,164	9,200	7,036

Eastern

	Gross completions	Net completions	RSS annual requirement	Residual Annual Build Rate
2004	297	274	250	
2005	259	232	250	
2006	558	517	250	
2007	277	218	250	
2008			250	237.3
2009			250	237.3
2010			250	237.3
2011			250	237.3
2012			250	237.3
2013			250	237.3
2014			250	237.3
2015			250	237.3
2016			250	237.3
2017			250	237.3
2018			250	237.3
2019			250	237.3
2020			250	237.3
2021			250	237.3
2022			250	237.3
2023			250	237.3
2024			250	237.3
2025			250	237.3
2026			250	237.3
Total	1,391	1,241	5,750	4,509

Western

	Gross completions	Net completions	RSS annual requirement	Residual Annual Build Rate
2004	250	230	275	
2005	195	184	275	
2006	203	184	275	
2007	234	224	275	
2008			275	289.6
2009			275	289.6
2010			275	289.6
2011			275	289.6
2012			275	289.6
2013			275	289.6
2014			275	289.6
2015			275	289.6
2016			275	289.6
2017			275	289.6
2018			275	289.6
2019			275	289.6
2020			275	289.6
2021			275	289.6
2022			275	289.6
2023			275	289.6
2024			275	289.6
2025			275	289.6
2026			275	289.6
Total	882	822	6,325	5,503

East Riding part of the Hull Strategic Housing Market area

	Gross completions	Net completions	RSS annual requirement	Residual Annual Build Rate
2004	558	503	460	
2005	622	573	460	
2006	592	526	460	
2007	848	780	460	
2008			460	431.5
2009			460	431.5
2010			460	431.5
2011			460	431.5
2012			460	431.5
2013			460	431.5
2014			460	431.5
2015			460	431.5
2016			460	431.5
2017			460	431.5
2018			460	431.5
2019			460	431.5
2020			460	431.5
2021			460	431.5
2022			460	431.5
2023			460	431.5
2024			460	431.5
2025			460	431.5
2026			460	431.5
Total	2,620	2,382	10,580	8,198