

East Riding of Yorkshire Council

Strategic Housing Land Availability Assessment

Position at 1 April 2012



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A Executive Summary

A.1 The *Strategic Housing Land Availability Assessment* (SHLAA) forms part of the evidence base for the emerging East Riding *Local Plan* (formerly the Local Development Framework or LDF). It is an extensive survey of existing and potential housing sites in the East Riding and will have particular relevance to the *Local Plan Strategy Document* and *Local Plan Allocations Document*. The *Local Plan Strategy Document* will set out how the Council will distribute new housing provision in general. The *Local Plan Allocations Document* will allocate specific sites that are consistent with this approach. **The SHLAA does not in itself determine whether a site would be allocated for housing.**

A.2 The *National Planning Policy Framework* (NPPF) states that local planning authorities must identify both a deliverable five year and a developable fifteen year supply of housing sites. The broad methodology for the SHLAA is set out in the 2007 national practice guidance issued by the Department for Communities and Local Government (DCLG). This requires potential housing sites to be tested according to a framework that considers their:

- Suitability (is the site a suitable location for housing?);
- Availability (is the site available now or is there a reasonable prospect of it becoming available?); and
- Achievability (is there a reasonable prospect of housing being achieved on the site?).

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

A.3 The East Riding base target is 1,150 (net) dwellings per annum as set out in the *Regional Spatial Strategy* (RSS). In reviewing the level of past housing completions against this requirement a residual target of 1,289 (net) dwellings per annum has been included in this SHLAA. The residual target includes an additional 'buffer' of 5% in terms of housing land supply to ensure choice and competition in the market for land. An allowance for windfall sites in the five year supply has also been made.

A.4 This update of the SHLAA includes a review of dwelling completions in the previous financial year (1 April 2011 to 31 March 2012) and has been prepared in accordance with relevant national guidance. In particular, a core working group, made up of Council officers, representatives from the house building sector (house builders, land agents) and other stakeholders was established to help steer the work and to respond to issues as they arise. The methodology used to assess the sites was, as far as possible, agreed with the working groups and is based on robust and up-to-date evidence presented by the Council. The sites were assessed applying the methodology and the results collated into this report.

- A.5** The SHLAA has been undertaken in a period of continued uncertainty with regard to the prevailing housing market conditions. This has been taken into account as part of the projection of housing completions in future years by adopting a realistic approach in the early years of the plan period. This position will be reviewed in future updates.
- A.6** The assessment finds that there is a **4.9 year supply of existing sites in the East Riding as a whole**, arising from planning permissions, existing allocated housing land, and windfall sites. It also shows that there is at least a five year supply for the Eastern and Northern sub areas. The Central and Western sub areas both have a shortfall in the five year supply.
- A.7** The report finds there is an abundance of potentially developable sites in all sub areas to meet any shortfall in provision over the next 15 years, and well beyond this. Therefore, the assessment finds that there is no need to outline any broad growth areas. The potentially developable sites will be considered for allocation through the East Riding *Local Plan* process.
- A.8** It is important to note that the report applies the market conditions, status of sites and policy guidance as at **1 April 2012**. The next update of the SHLAA will set out the position as at 1 April 2013. This update will take into account prevailing market conditions and other matters such as the proposed abolition of the RSS, new elements of the evidence base and the emerging East Riding *Local Plan*.
- A.9** For clarity, the SHLAA does not allocate sites for development, nor does it create new policy. The inclusion of sites in the SHLAA or comments made about them does not in any way imply that those sites will be granted planning permission or will be allocated for development in the *Local Plan Allocations Document*.

I Introduction

Background to the Assessment

- 1.1** In order for local planning authorities to identify sufficient land to meet their housing requirements, currently determined by the *Regional Spatial Strategy (RSS)*, the *National Planning Policy Framework (NPPF)* sets out the need to carry out a *Strategic Housing Land Availability Assessment (SHLAA)*.
- 1.2** The SHLAA forms part of the evidence base for the emerging East Riding *Local Plan* (formerly the *Local Development Framework or LDF*) and will help inform the allocation of sites set out in the *Local Plan Allocations Document*.
- 1.3** It is important to note the distinction between the SHLAA and the *Local Plan Allocations Document*. The SHLAA does not allocate sites for development, nor does it create new policy. Its purpose is to assess the potential supply of sites to meet the likely need for housing. This is a background paper, which will inform the emerging East Riding *Local Plan*. The *Local Plan Allocations Document* will set out where the local planning authority proposes to allocate land for housing. The preparation of the *Local Plan Allocations Document* will involve a rigorous sustainability assessment of individual sites against a *Site Assessment Methodology* (March 2011) as well as full consultation with the wider community and public examination by an independent planning inspector.
- 1.4** The SHLAA also helps with the broad selection of locations for new housing in the East Riding *Local Plan* in that it helps identify in land terms, the basic capacity of settlements to accommodate housing growth.
- 1.5** **Please note, the inclusion of sites in the SHLAA or comments made about them does not in any way imply that those sites will be granted planning permission or allocated for development in the *Local Plan Allocations Document*.**

Context

- 1.6** This assessment has been carried out in accordance with the policy and development framework provided by the following:

National Policy

- *The National Planning Policy Framework* (March 2012)

The ‘Development Plan’

- *Yorkshire and Humber Plan: Regional Spatial Strategy to 2026* (May 2008)

- Saved policies in the *Joint Structure Plan for Kingston upon Hull and the East Riding of Yorkshire* (2005)
- Saved policies in the four existing Local Plans: *East Yorkshire Borough Wide Local Plan* (June 1997), *Beverley Borough Local Plan* (June 1996), *Holderness District Wide Local Plan* (April 1999) and the *Boothferry Borough Local Plan* (April 1999)

The emerging East Riding Local Plan

- *Potential Sites Allocations Document* (May 2010)
- *Further Consultation Core Strategy* (October 2011)
- *Bridlington Town Centre Area Action Plan* (Submission, April 2011)

Interim Approaches and Position Statements

- *Cabinet report on the Council's Approach to the Abolition of Regional Spatial Strategy for Yorkshire and the Humber* (September 2010)

Other Evidence

- *The Strategic Housing Market Assessment (SHMA)* (October 2011)
- Recent patterns of development

The National Planning Policy Framework

- 1.7** Published on 27 March 2012, the *National Planning Policy Framework* (NPPF) aims to make planning less complex and more accessible by removing a series of planning policy statements which were considered too lengthy and complex. The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. For housing this means providing the supply of housing required to meet the needs of present and future generations.
- 1.8** The NPPF retains many key aspects of the now deleted *Planning Policy Statement 3 Housing* (2006) in that local planning authorities are still required to prepare a SHLAA in order to establish realistic assumptions about the availability, suitability and achievability of land to meet the identified need for housing over the plan period.
- 1.9** Paragraph 47 of the NPPF requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. 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 five years and development of the site should be viable.

- 1.10** In addition to identifying sufficient specific deliverable sites for the first five years of the plan period, a further supply of specific developable sites for years 6-10, and where possible for years 11-15 should be identified. To be considered developable sites should offer a suitable location for housing development and there should be a reasonable prospect the site is available and can be viably developed at the point envisaged. Where it is not possible to identify sufficient sites for years 11-15, broad locations for future growth should be identified.
- 1.11** The NPPF makes some significant additions to the deleted *Planning Policy Statement 3 Housing (2006)*:
- **Viability** - local planning authorities should consider the likely economic viability of land to help inform whether a site is deliverable (Paragraph 47). This formalises what is set out in the practice guidance which states that assessing the achievability of a site for housing is a judgement about the economic viability of a site.
 - **Supply buffer** - local planning authorities are required to include an additional allowance or 'buffer' of 5% (moved forward from later in the plan period) in terms of supply to ensure choice and competition in the market for land. Local planning authorities with a record of persistent under delivery of housing should consider applying a 20% buffer (Paragraph 47).
 - **Windfall sites** - local planning authorities may make an allowance for windfall sites in their five year supply if they have compelling evidence such sites have consistently become available in the local area and will continue to provide a reliable source of supply (Paragraph 48).
- 1.12** Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites (Paragraph 49).

The Regional Spatial Strategy

- 1.13** The Yorkshire and Humber Plan, which is the *Regional Spatial Strategy (RSS)* for the Yorkshire and Humber area, remains part of the Development Plan for the East Riding. The RSS, together with the saved policies in the four existing Local Plans and the *Joint Structure Plan (JSP)* continue to be used to determine planning applications in the East Riding (alongside any material considerations).
- 1.14** The Coalition Government has made clear its intention to abolish Regional Spatial Strategies. In the meantime the RSS for the Yorkshire and Humber area provides a direction for the level of housing required in the East Riding.

- 1.15** The gross RSS requirement for the East Riding is 1,190 dwellings per annum. Taking into account the likely clearance or loss of dwellings to other uses, the net RSS requirement for the East Riding is 1,150 dwellings per annum. This means the net housing requirement over the remaining part of the RSS plan period (fourteen years) is 16,100 dwellings. The RSS notes that around 40% of this total should be provided within the Hull Housing Market Area (HHMA).
- 1.16** In response to the original proposed revocation of RSS in 2010, the Council confirmed that it would continue to use the RSS housing figures in the short term (Cabinet Report on 7 September 2010). The RSS figure remains 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. A revised housing target will be established through the *Local Plan Strategy Document*.
- 1.17** The RSS identified the Principal Towns in the East Riding as Goole, Beverley, Driffield and Bridlington. Settlements forming part of the RSS defined Regional City are Cottingham, Hessle, Anlaby, Kirk Ella and Willerby and are referred to as the Major Haltemprice Settlements. The Principal Towns and the Major Haltemprice Settlements provide the focus for development in the East Riding.

Joint Structure Plan for Kingston upon Hull and the East Riding of Yorkshire

- 1.18** The *Joint Structure Plan* (JSP) was adopted in June 2005. A number of policies expired in June 2008 and were replaced by policies in the RSS. Other JSP policies were saved and continue to be used. The saved policies of most relevance to the SHLAA are DS3 (Towns), DS4 (Smaller settlements and the countryside) and H7 (Housing development in villages).
- 1.19** The JSP uses an approach that divides the East Riding into four sub areas (Northern, Central, Eastern and Western). Pending completion of the East Riding *Local Plan*, the SHLAA continues to adopt a sub area approach in order to bring a more local focus to an authority that covers such a large area.

Local Plans

- 1.20** The four existing Local Plans (*East Yorkshire Borough Wide Local Plan*, *Beverley Borough Local Plan*, *Holderness District Wide Local Plan* and the *Boothferry Borough Local Plan*), contain a number of undeveloped housing allocations. These have been used to calculate the supply of housing from existing allocated sites. These policies have been saved and continue to be used.

Emerging East Riding Local Plan

- 1.21** Paragraph 216 of the NPPF allows decision takers to give weight to relevant policies in emerging Local Plans according to:
- the stage of preparation of the emerging plan;

- the extent to which there are unresolved objections to relevant policies; and
- and the degree of consistency of the relevant policies in the emerging plan to the policies in the NPPF.

Potential Sites Allocations Document (May 2010)

1.22 The *Local Plan Allocations Document* will, when adopted, allocate sites for specific uses including housing. The *Potential Sites Consultation* presented a number of site allocation options for consideration and was the first stage in the preparation of the *Local Plan Allocations Document*. The 'land bids' submitted to the Council for consideration by landowners and developers form part of the potential supply in the SHLAA. The next update of the SHLAA will consider the policy context provided by the progression of the *Local Plan Allocations Document*.

Further Consultation Core Strategy (October 2011)

1.23 On the 22 May 2012 the *Position Statement on Housing in Rural Areas* (April 2009) was cancelled by the Council's Cabinet. In light of the weight that can be afforded to emerging plans and the absence of saved Development Plan policies relating to the settlement network, the settlement network identified in the *Further Consultation Core Strategy* (Policy SS2) provides the most up-to-date position to determine which sites are included in this SHLAA. Policy SS2 of the *Further Consultation* confirms that the higher levels of the settlement network established through the RSS and JSP will continue to be used. For clarity, the settlements considered within the SHLAA are listed in Chapter 3.

Bridlington Town Centre Area Action Plan

1.24 The *Bridlington Town Centre Area Action Plan* (AAP) has been found 'sound' by an independent planning inspector. This provides for housing in the Town Centre of Bridlington. When the AAP is adopted, the housing sites in the AAP will be included in future updates of the SHLAA.

The Strategic Housing Market Assessment

1.25 The *Strategic Housing Market Assessment* (SHMA) considers the characteristics of the housing markets within the East Riding, how they work now and potential changes in the future. This includes identifying the range of tenures needed to cater for housing demand and the scale of housing needed to meet the demand. To understand the housing requirements of the East Riding and the ability of areas to accommodate development, a range of evidence, in addition to the SHMA, informs the ongoing preparation of the East Riding *Local Plan*.

Recent Patterns of Development

1.26 Despite over provision against the net RSS requirement of 1,150 dwellings between 2004-05 and 2007-08, recent patterns of development (see Tables 1 and 2 below) show that due to the impact of the housing market downturn and the resulting reduction in housing completions, the East Riding has had an overall under provision of 908 dwellings against the eight year (2004-2012) net RSS requirement of 9,200 dwellings.

1.27 The 'gross' completions figure for each year indicates the total number of dwellings completed in that year. The 'net' completions figure is important because it takes into account the gains and losses from dwelling conversions, change of use and demolitions.

Table 1 - Annual gross and net completions (2004 to 2012)

		Central	Eastern	Northern	Western	Total	HHMA
2004-05	Gross	535	303	447	253	1,535	584
	Net	495	280	413	233	1,421	*
2005-06	Gross	613	291	359	205	1,468	654
	Net	580	264	323	194	1,361	*
2006-07	Gross	528	589	304	214	1,635	625
	Net	473	548	264	195	1,480	*
2007-08	Gross	804	327	452	267	1,850	919
	Net	757	268	435	257	1,717	*
2008-09	Gross	342	268	79	98	786	384
	Net	304	198	49	91	642	*
2009-10	Gross	191	102	95	111	499	217
	Net	168	79	74	93	414	*
2010-11	Gross	239	134	98	77	548	292
	Net	197	91	65	15	368	*
2011-12	Gross	403	208	191	160	962	453
	Net	386	175	179	149	889	*

**net figures not available for these years*

The comparatively low completion figure in the Western sub area in 2010-11 can largely be accounted for by 58 demolitions in Phoenix Street, Goole.

Performance and Residual Targets

- 1.28** The sub area picture varies substantially. Table 2 (below) shows that the Central sub area is the only one of the sub areas to significantly over provide against the eight year net RSS requirement (by 160 dwellings). This may be due in part to the strength of the housing market in the area, which has seen it weather the housing downturn far better than the other sub areas. The Northern sub area also over provides against the eight year requirement, albeit marginally.
- 1.29** Despite the high level of completions in 2006-07, largely as a result of significant numbers of developments in Bridlington, the reductions in completions in recent years has meant that the Eastern sub area has slightly under provided against the eight year net RSS requirement (by 97 dwellings).
- 1.30** The Western sub area has by far the largest under provision (-973 dwellings) over the eight years and is responsible for the vast majority of under provision in the East Riding. This has altered the residual target for that sub area quite substantially, whereas the other sub areas remain virtually unchanged.
- 1.31** The plan period has seen 6,323 dwellings completed in the Hull Housing Market Area (HHMA). This is 44% of the gross total completions for the East Riding, exceeding the RSS target of 40%.
- 1.32** For 2011-12 the net housing completions figure for the East Riding (889 dwellings) is significantly higher than the net housing completions figure for the previous three years, reflecting an improvement in the housing market. In a buoyant housing market in the four years prior to the economic downturn (2004-5 to 2007-08) an average of 1,495 (net) dwellings were completed each year. This was consistently good against the RSS net requirement of 1,150 dwellings per year.
- 1.33** There is still an overall under provision in the number of housing completions against the eight year RSS requirement, largely as a result of prevailing housing market conditions. The Council has adopted a residual approach in order to try to make back the shortfall over the preceding period. To be consistent with the use of net figures to calculate residual provision, net base targets have replaced the gross targets.

Table 2 - Housing completions and residual targets

	Central	Eastern	Northern	Western	Total
Total net completions 2004 - 2012	3,360	1,903	1,802	1,227	8,292
Net RSS requirement 2004 - 2012	3,200	2,000	1,800	2,200	9,200
Over/ under Provision	+160	-97	+2	-973	-908
Divided by 14 years (left in the RSS plan period)	N/A	-7	N/A	-70	-77
Base net annual target	400	250	225	275	1,150
Residual annual target	400*	257	225*	345	1,227
Annual residual target (including the 5% buffer)	420	270	236	363	1,289
5 year residual target (including the 5% buffer)	2,100	1,350	1,180	1,815	6,445

*Please note - The residual annual target for the Central and Northern sub areas remains the same as the base net target because these areas have over provided over the plan period. Figures may not total due to rounding.

Applying a 5% buffer

1.34 For the position as at 1 April 2012, the residual target has been calculated taking the NPPF into account, more specifically the requirement to provide an additional buffer (5%) in terms of supply to ensure choice and competition in the market for land.

1.35 The annual residual target for the East Riding (including a 5% buffer) has been worked out as follows, using the total for the Eastern sub area as an example:

1. The difference in provision per sub area (-97)
2. Divided by the 14 years left in the RSS plan period (-7)
3. Added to the net base target of 250 to produce a residual annual target (257)
4. Finally a 5% buffer is added = 270
5. Calculation results in a residual net figure of **270 dwellings per annum for the Eastern sub area**

- 1.36** Adding together the annual residual requirement for each sub area, worked out using the above calculation, results in an overall **East Riding annual residual requirement (including a 5% buffer) of 1,289 dwellings.**
- 1.37** The above method is considered an appropriate way to calculate the residual target. Recent trends of under delivery against the RSS can be largely accounted for by the economic downturn and lack of finance available for developers and home buyers. It is not necessarily a reflection of the availability or delivery of land for development. In a buoyant housing market prior to the economic downturn (2004-5 to 2007-08) the Council consistently over provided against the requirements set out in the RSS.
- 1.38** The Planning Advisory Service suggest it would be appropriate for local planning authorities to consider previous housing delivery over the long term (5-10 years) to inform a judgement as to what level of buffer should be used (Source: NPPF Frequently Asked Questions). Examining historic trends reveals the Council consistently over provided prior to the economic downturn. Between 1996-97 and 2007-08 an average of 1,538 gross dwellings were completed each year, higher than the RSS gross requirement of 1,190 dwellings per year (please note, net completions are not available for this time period). A 5% buffer has been included within this SHLAA as the housing under provision in the East Riding cannot reasonably be considered 'persistent'.
- 1.39** The most appropriate way of dealing with housing shortfall is a matter of judgement. Making up the shortfall over a five year period is not considered to be a realistic approach. The NPPF (Paragraph 158) states that a SHLAA should be prepared to "*establish realistic assumptions about the availability, suitability and likely economic viability of land to meet the identified need for housing*". Recognising the current economic climate, the SHLAA continues to adopt a residual approach, spreading the housing shortfall over the remaining years of the RSS plan period (14 years). This approach, alongside other elements of the methodology (discussed in the next chapter) are open to review as part of the next update to the SHLAA and in light of the emerging East Riding *Local Plan*.

Brownfield Completions

- 1.40** Table 3 shows the past performance of the Council in achieving the re-use of previously developed land (PDL). The percentage of completions achieved on PDL was low (less than a third) before the *Managed Release Interim Planning Guidance (IPG)* was introduced in October 2003. After this date the percentage of dwellings on PDL rose well above 50% and, despite the economic recession, continued to provide the majority of completions, with the exception of last year. The IPG was cancelled in October 2011.

Table 3 - Brownfield completions

Financial Year	Brownfield Completions	Total completions (gross)	% Brownfield Completions
2001-02	319	1,550	21
2002-03	303	1,530	20
2003-04	637	1,907	33
<i>Managed Release Interim Planning Guidance introduced during 2003/04</i>			
2004-05	753	1,535	49
2005-06	667	1,468	45
2006-07	961	1,635	59
2007-08	982	1,850	53
2008-09	583	786	74
2009-10	343	499	69
2010-11	354	548	65
2011-12	426	962	44
Total	6,183	14,270	44

2 Consultation

Establishing a Partnership

- 2.1** National practice guidance stresses the importance of a partnership approach, with local planning authorities and other key stakeholders working together to ensure a joined up approach. Private sector house builder input, in particular, helps provide an important market-based perspective.
- 2.2** The Council has consulted with neighbouring authorities throughout the SHLAA process in order to achieve a joined up approach. These authorities include Hull City Council, City of York Council, Doncaster Metropolitan Borough Council, North Lincolnshire Council, North East Lincolnshire Council, Ryedale District Council, Scarborough Borough Council and Selby District Council.
- 2.3** In addition to consultation with other authorities, the Council has set up two tiers of working group. The first is a core working group. This group comprises people who are central to the SHLAA development process. The members are invited to meetings to represent their wider groups throughout the SHLAA process. The core working group consisted of:
- A forward planning officer from Hull City Council who is involved in the production of the Hull SHLAA;
 - 2 professionals representing national house builders (Linden Homes, Barton Willmore); and
 - 2 professionals representing local house builders (Risby Homes, Scruton Homes).
- 2.4** The second working group is the wider working group. Members of the wider working group were consulted throughout the process, particularly on the conclusions arising from the core working group meetings. Notable members of the wider working group included:
- The Environment Agency;
 - The Home Builders Federation;
 - The Highways Agency; and
 - A range of other house builders and agents.
- 2.5** The composition of the working groups reflects the issues facing housing provision in the East Riding, as well as the way its housing issues affect other authorities. The presence of the Environment Agency reflects flood risk issues in large parts of the East

Riding and the need to factor in flooding issues when formulating the methodology for the assessment. The East Riding's many cross-border issues with Hull, means an officer from Hull City Council attends the working group to ensure consistency between the two councils' SHLAAs. Cross boundary issues concerning East Riding of Yorkshire Council and Hull City Council, such as the provision of housing, are primarily addressed by the two Council's respective Local Plans.

2.6 Appendix A provides a full list of core working group and wider working group members.

Consultation

2.7 Three stages of consultation have been followed in preparing this SHLAA. These are set out below.

Methodology

2.8 Developing the methodology occurred over three meetings with the core working group and a formal consultation with both working groups. Numerous aspects of the methodology were evidenced by the Council and discussed in detail.

2.9 The first meeting of the core working group was held on 24 May 2012 to discuss the methodology used for assessing sites and to present initial figures and evidence. Some issues such as build rates for large sites and pre-build lead in times were resolved at this meeting. The working group requested additional evidence be gathered in relation to density rates, developable areas and local authority affordable housing schemes. This additional evidence was presented over the course of two further meetings (15 June, 26 June 2012) ensuring the evidence feeding into the SHLAA was as up-to-date and robust as possible. Other elements of the methodology discussed over the course of these two meetings included:

- Completions and residual housing target;
- Discount for non-implementation; and
- Incorporating an element of windfall in the supply.

2.10 A formal consultation on the proposed methodology with both working groups allowed for most issues to be resolved and a methodology, as far as possible, to be agreed.

Draft Report Consultation

2.11 Following the methodology consultation the core working group were presented with the draft findings of the SHLAA (7 September 2012). The following issues were discussed at this meeting:

- The application of the methodology;
- The report findings; and

- The implications of the NPPF.

2.12 A formal consultation with both working groups on the draft final SHLAA report (13 September 2012) enabled all stakeholders to comment on the draft report.

The Developability and Deliverability of Sites

2.13 A key part of the assessment requires input from professionals in the house building industry regarding the developability and deliverability of sites. On 19 September 2012 both working groups were invited to comment on the sites in the SHLAA based on the assessment criteria. Outcomes of this consultation stage included:

- Changes to the details of sites, such as ownership;
- Some sites were merged when two adjacent sites were owned by the same party or were split where they were owned by different parties; and
- Some sites were moved from a deliverability period of 6-10 years to 0-5 years and vice versa if the developer or agent submitted evidence to support this change.

Finalising the report

2.14 The Council received a number of responses at the draft report consultation stage. The key issues raised by some members of the working groups included:

- The application of a 5% buffer;
- The approach to making up the housing shortfall;
- Whether existing undeveloped Local Plan allocations contribute to the five year supply; and
- Whether a windfall allowance should be included in the five year supply.

2.15 All responses to the draft report consultation were taken into account during the production of the final report. Where there were differences of opinion in relation to any of the above points, the rationale behind the approach adopted in the SHLAA has been set out. This can be found primarily in the next chapter although the application of a 5% buffer and the residual approach is discussed in the previous chapter.

2.16 The next chapter sets out the methodology applied to the sites which was, as far as possible, agreed with the working groups based on up-to-date and robust evidence presented by the Council.

3 Methodology

Good Practice

- 3.1** National practice guidance provides more detailed advice for carrying out a SHLAA, supporting the advice contained in the NPPF, 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 individual site; and
 - The identification of potential constraints on the delivery of housing on each site and where appropriate, recommendations on how these constraints may be overcome.
- 3.2** The guidance 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.
- 3.3** The guidance 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*” (page 11).
- 3.4** The Council has also considered the advice in the Planning Advisory Service’s, *Strategic Housing Land Availability Assessment: Frequently Asked Questions*’ (January/February 2008). This advises against scoring sites because it will mean the SHLAA report going beyond assessing deliverability to making judgements about which are the “best” and may be more appropriate for inclusion in the plan.
- 3.5** Such judgements are plan-making judgements and should be made as part of the preparation of the East Riding *Local Plan*, rather than in the SHLAA. To score or rank sites will make it difficult to persuade people that the SHLAA merely provides information about possible sites, because it will be seen as beginning to make the decisions. It may also present difficulties for developer partners in the assessment. On the basis of the logic of this advice the SHLAA does not include scoring.

Assessed Settlements

3.6 The NPPF (Paragraph 216) states that decision takers may give weight to relevant policies in emerging plans, taking into account the stage of preparation of the emerging plan. Given the weight that can be afforded to emerging Local Plans and the absence of any saved Development Plan policies relating to the Settlement Network, it is considered appropriate to use the Settlement Network in the *Further Consultation Core Strategy* to determine the settlements included within this SHLAA. The list of settlements included in the SHLAA are illustrated below by Figure I and listed below in Table 4. The HHMA is also shown in Figure I.

Figure I Core Strategy Further Consultation Settlement Network

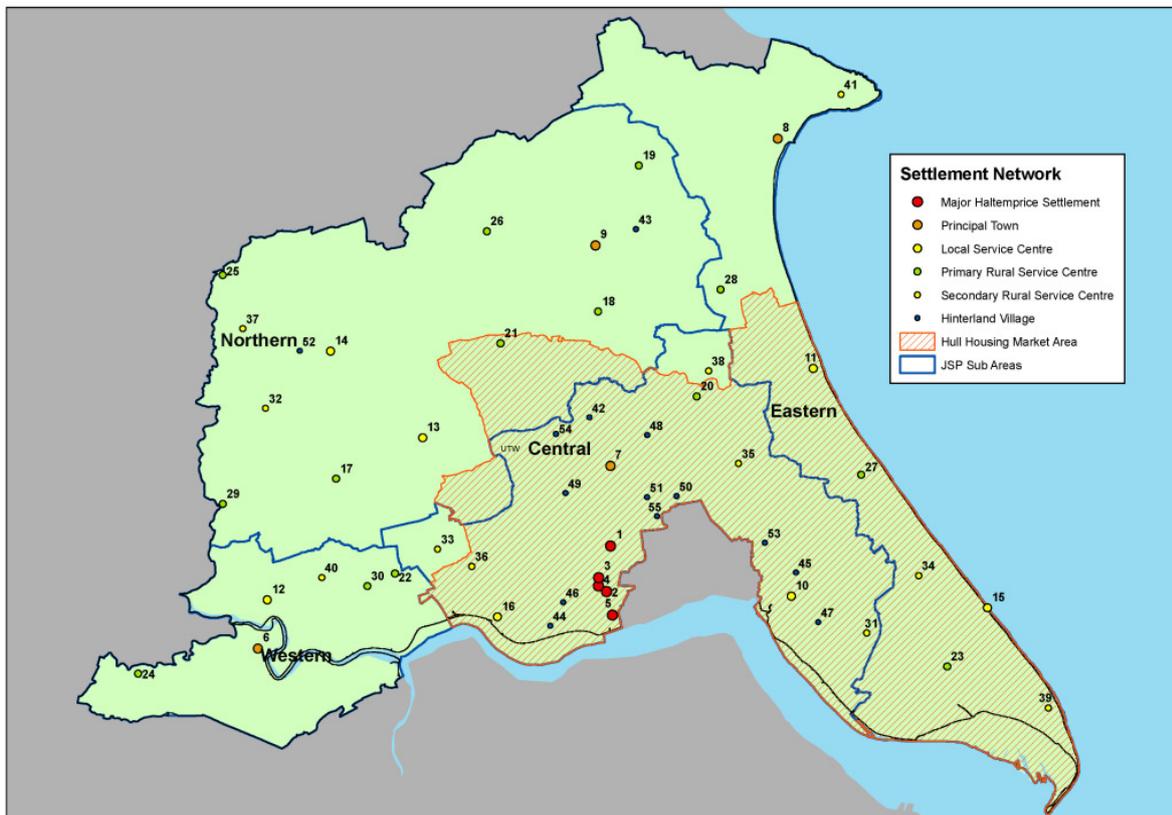


Table 4 - Settlement network

Settlement Network	Settlement Name	Map Number
Major Haltemprice Settlement	Cottingham	1
	Anlaby	2
	Willerby	3
	Kirk Ella	4
	Hessle	5
Principal Town	Goole	6
	Beverley	7
	Bridlington	8
	Driffield	9
Local Service Centre	Hedon	10
	Hornsea	11
	Howden	12
	Market Weighton	13
	Pocklington	14
	Withernsea	15
	Brough	16
Primary Rural Service Centre	Holme on Spalding Moor	17
	Hutton Cranswick	18
	Kilham	19
	Leven	20
	Middleton on the Wolds	21
	Newport	22
	Patrington	23
	Snaith	24
	Stamford Bridge	25
	Wetwang	26
	Aldbrough	27
	Beeford	28

Settlement Network	Settlement Name	Map Number
	Bubwith	29
	Gilberdyke	30
Secondary Rural Service Centre	Keyingham	31
	Melbourne	32
	North Cave	33
	Roos	34
	Skirlaugh	35
	South Cave	36
	Wilberfoss	37
	Brandesburton	38
	Easington	39
	Eastrington	40
	Flamborough	41
Hinterland Village	Leconfield	42
	Nafferton	43
	North Ferriby	44
	Preston	45
	Swanland	46
	Thorngumbald	47
	Tickton	48
	Walkington	49
	Wawne	50
	Woodmansey	51
	Barmby Moor	52
	Bilton	53
	Cherry Burton	54
	Dunswell	55

Populating the SHLAA

3.7 Sites in the SHLAA are put into two broad categories: **existing and potential supply**. Existing supply consists of sites which do not have policy restrictions and can be developed now. Potential supply consists of sites that have been identified for consideration through the East Riding *Local Plan* and may be currently constrained by existing policy restrictions.

Existing supply

- **Large sites with planning permission:** Sites over 5 dwellings with either outline or full permission which remain undeveloped as of 31 March 2012 (though they may have commenced but not completed building work).
- **Small sites with planning permission:** Sites with less than 5 dwellings with either outline or full permission which remain undeveloped as of 31 March 2012 (though they may have commenced but not completed building work). These sites are assessed in less detail than all other sites and are not included on the SHLAA maps.
- **Allocations:** Sites included as allocations in the four existing Local Plans which are identified in the above Settlement Network and which don't have a current planning permission (remain undeveloped).
- **Windfall sites:** Dwellings expected to come forward on sites not specifically identified as allocations at this time, for example on vacant land.

3.8 As noted in the previous chapter, some members of the working groups asked if allocated sites from the existing Local Plans should be included as part of the five year supply. Over the past ten years almost 40% of the dwellings completed in the East Riding have been delivered on existing allocated housing sites. Allocated sites remain part of the Development Plan which is the starting point for making decisions on planning applications. These sites are still considered acceptable in principle and are included within the five year supply.

3.9 It is important to note that only allocated sites within settlements in the settlement hierarchy are included in the SHLAA and that a non-implementation discount has been applied to existing allocated sites to account for a proportion of them not coming forward in the next five years.

Potential supply

3.10 The potential supply is made up of sites which do not fall into any of the above categories described above. These sites come from several different sources, including:

- Land bids: sites put forward by landowners and developers for consideration through the East Riding *Local Plan*. They usually take the form of unallocated greenfield land outside of development limits, but include a variety of forms, including land currently allocated for education, employment and other non-housing uses.
- Sites identified in the emerging *Bridlington Town Centre Area Action Plan (AAP)*.
- Sites identified in masterplans such as the *Goole Renaissance Plan*.
- Brownfield land identified in the National Land Use Database (NLUD) and the Council's Strategic Urban Potential Study.
- Sites identified by officers, in a small number of cases.

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 settlements recognised as being in the settlement network were included in the assessment.
- 3.12** This approach also reflected the fact that initial assessments of supply indicated that the East Riding had an abundance of potential sites without significant constraints in and around the settlements listed in the network to meet a fifteen year housing supply. Therefore, there was no need to assess additional sites in other smaller settlements. This means that many sites submitted to the Council as land bids are not included in the SHLAA assessment.
- 3.13** In the majority of cases land bids were assessed as they were submitted to the Council. In some instances land bids were either joined or split up in order to produce realistic and tenable housing sites and to make sites easier and more practical to assess. This was particularly the case for large sites in smaller settlements where the prospect of such growth was considered to be unlikely and inappropriate in scale.

The Assessment

- 3.14** The SHLAA has been populated in a simplified manner that achieves the core outputs. Appendix B sets out the results of the individual site assessments. The sheer number of sites in the East Riding (which is one of the largest Councils in the country by area) 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:
- **SHLAA 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 B.

- **Settlement hierarchy:** Where the settlement is placed in the *Further Consultation Settlement Network* (Table 4).
- **Allocations Document reference:** Where relevant, the site reference set out in the *Potential Sites Consultation Allocations Document* has been included for information. Not all sites will link up with this consultation as this document included non-housing uses. The SHLAA also includes land bids submitted to the Council following May 2010. This reference will be updated as the *Local Plan Allocations Document* progresses.
- **JSP Sub Area:** Identifies which one of the four JSP sub areas the site falls within.
- **Type:** All sites are classed as 'allocation site', 'permission site' or 'potential site'.
- **Date of permission:** If relevant.
- **Reason considered:** Information showing what source the site came from, e.g. a land bid, housing allocation, etc.
- **Area:** Gross area of the site in hectares (ha).
- **Net developable area:** Area of site that can be developed purely for housing.
- **Density:** Differs by settlement network level and for greenfield and brownfield sites.
- **Net capacity:** The estimated number of dwellings that can be accommodated onto the net site area. This is calculated as net developable area multiplied by density. For planning permissions this number represents the total number of dwellings given by the most recent permission on the site.
- **Capacity remaining:** In the case of sites with planning permission, this figure shows the remaining number of dwellings still to be complete (as of 1 April 2012) if development has already started. This figure will be the same as net capacity for all other types of sites.
- **GF/PDL:** Whether the site is composed entirely of greenfield land, previously developed land, or a mix of both.
- **National policy restrictions:** National guidance states that only national policy designations should be considered when assessing whether a site is developable. 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 fifteen year housing supply and will be held in abeyance. The following are relevant national policy designations:
 - Sites of Special Scientific Interest (SSSI)

- Ramsar Sites, Special Protection Areas (SPA)
 - Special Areas of Conservation (SCA)
 - National Nature Reserves (NNR)
 - Schedule Monuments, Ancient Woodlands
 - Health and Safety Executive Inner Zones
 - Flood Risk areas - Zone 3b 'Functional Floodplain'
-
- **Risk of flooding:** A significant issue for the East Riding, flooding has been kept separate from other physical constraints. The level of flood risk has been determined by the Council's Level 1 Strategic Flood Risk Assessment, (SFRA) (January 2010). The SFRA is a detailed assessment of flood risk and only the basic, critical data is included in the site assessments. Goole has been assessed with a Level 2 SFRA (July 2011) which includes data on the level of hazards posed to areas from flood defence breaches. More detail on sites and an explanation of the SFRA assessment methods the document can be viewed on the Council's website.
 - **Physical limitations:** Includes significant issues that will inhibit the site coming forward and therefore adversely affect its suitability. These issues include: access to the site, neighbouring uses, proximity of wastewater treatment works, contamination, topography and mineral designations, etc.
 - **Ownership details:** Details of the owner/s and/or representative/s of the site where known.
 - **Can availability and suitability constraints be overcome?** A range of possible solutions for any availability or suitability constraints.
 - **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 - 5 year supply. A site that has issues that can be resolved in the short to medium term is placed in the 6 -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 -15 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.
 - **Deliverability in years:** This question is broken into the 3 time periods of the plan period: years 0-5; years 6-10; and years 11-15. The number of dwellings that can be built in a plan period will be shown here. The development of some sites will run over different time periods.

Calculating Density

- 3.15** When calculating the density rates for sites (dwellings per hectare), to reflect the current state of the market the Council used the density rates agreed in approvals over the last three years. Average density figures were taken from a sample of settlements for both greenfield sites and brownfield sites. At the request of the core working group, flats were excluded from the sample as these were thought to skew the results. The assumptions in Table 5 below were agreed by the majority of working group members. In the case of mixed sites, where both greenfield and brownfield land is present, the predominant type of land (over 50%) will be used to determine the density for the whole site.
- 3.16** It was agreed that the density assumptions will be used as a broad-brush approach. If any developer considered their site would differ from the assumptions then they could submit the estimate of the density on their site and it would be included accordingly in the SHLAA.

Table 5 - Density rates (dph)

Settlement	Greenfield Site	Brownfield Site
Major Haltemprice Settlements	35	40
Principal Towns	35	45
Towns	30	50
Rural Service Centres and Supporting Villages	30	35
Other	30	25

Calculating Developable areas

- 3.17** On large sites it was agreed that not all of the area of the site can be developed solely for houses. In the case of large sites, using the gross site area can be misleading because space on larger housing sites will be required for ancillary uses. Using the 'net developable area' is a useful way of discounting for those parts of the site not developed for housing.
- 3.18** The net developable area includes those areas within a site which are developed for housing and directly associated uses. This includes access roads within the site, private garden space, car parking areas, incidental open space and landscaping and children's play areas (where these are to be provided). Beyond this it is considered reasonable to exclude the following from the definition of net developable area:
- Major distributor roads;
 - Primary schools;

- Open spaces serving a wider area; and
- Significant landscape buffer strips.

3.19 The above definition is sourced from the now deleted Planning Policy Guidance 3 (2000) which provides the most reasonable and available guidance on the issue.

3.20 A range of assumptions are set out in Table 6 (below). These are based on an analysis of completed and proposed developments applying the above definition of net developable area. The assumptions are useful in that they indicate the expected capacity of potential housing sites included within the assessment. For example, it can be expected that for sites over 5 hectares, 75% of the available land would be occupied by housing. Evidence suggests it is reasonable to assume 100% of the area of small sites could potentially be developed for housing because smaller sites are likely to utilise existing infrastructure and facilities. A proposal for 5 dwellings, for example, is very unlikely to include a major distributor road, school, significant open space or landscaping buffer. The working groups considered that including a threshold of 5.0 to 10.0 hectares was reasonable.

Table 6 - Developable areas

Site area (ha.)	Gross to Net Ratio (%)
Up to 0.5	100
0.5 to 2.0	90
2.0 to 5.0	85
5.0 to 10.0	75

3.21 Land bids submitted to the Council as mixed use 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, the gross to net ratio is applied; after this the density multiplier will be applied to find the potential housing capacity of a site.

3.22 It was agreed that developable area assumptions should be used in a broad-brush manner. If any developers considered their site would differ from the assumptions they could submit estimates of the developable area of their site for inclusion accordingly in the SHLAA. For example, if development constraints were considered to apply on site (steep slopes, heavy tree cover, awkward shape etc).

Pre-build lead in times

3.23 This is the lead-in time from the point of identification of a site to the start of development. It was agreed with the core working group that the larger the site the longer the timeframe required in pre-application and application periods and to negotiate section 106 agreements, etc. The pre-build timescales agreed were:

- Outline permission (fewer than 15 plots) - 18 months.
- Reserved Matters/Full Permission granted after April 2010 (fewer than 15 plots) - 12 months.
- Outline permission (15 or more plots) - 30 months.
- Reserved Matters/Full Permission granted after August 2009 (15 or more plots) not yet started - 18 months.

In addition, similar pre-build lead in times will be used for allocated sites without planning permission and all other potential sites:

- 18 months for sites with fewer than 15 plots.
- 30 months for sites with 15 plots or more.

3.24 No lead in-time was applied to sites granted permission prior to the dates above. They were considered to have 'used up' their lead-in-time. It was agreed that the above assumptions be used a broad-brush approach. If any developers considered their site would differ from the assumptions they could submit the estimated pre-build rate of their site for inclusion accordingly in the SHLAA.

Build rates for large sites

3.25 This is an estimate of how many dwellings can be built on a site in a year. Build rates are affected by factors such as the strength of the housing market in the area; the availability of finance; the number of developers on a site; and their capacity to build out the site. The assumed rates, agreed with the working groups are:

Table 7 - Annual build rates

Size of site	2012-13 (recession rates)	2013-14 (interim rates)	2014 onwards (normal rates)
less than 10 units	4	6	8
less than 50 units	15	20	25
less than 200 units	25	30	35
less than 400 units (assuming 2 developers)	45	55	70
400 or more units (assuming 3 developers)	60	80	105

3.26 The build rates start off at a reduced rate to reflect the current slow down in the market, and return to normal levels by 2014-15. These rates are continued from the last SHLAA as the core working group considered the housing market remains affected by the economic recession. If any developers considered their site would differ from the assumptions they are welcome to submit the build rates of their site for inclusion accordingly in the SHLAA.

Build rates for small sites

3.27 A significant proportion of housing completions in the East Riding year-on-year are made up of small sites, i.e. sites with less than 5 dwellings. To project them into a trajectory with a build rate similar to larger sites would result in an unrealistically high number of completions in the first year, with no completions thereafter.

3.28 To prevent this, small sites have had their completions projected over the coming five year supply period using historical rates of completion (or implementation) from the previous five years. The projections apply for five years only because as an average over the last five years, 60% of dwellings from small sites were built by the fifth year of their permission. The five year timescale will roll on year-on-year. A sub area approach was taken to the projection of small sites, as the rate of small site completions vary over these geographical areas.

Calculating a windfall allowance

3.29 A windfall site is a site not specifically identified as available through the East Riding *Local Plan* process, for example previously-developed sites that unexpectedly become available.

Table 8 - Windfall completions in the East Riding

	Windfalls completed	Gross completions	Windfalls completed as a percentage of annual gross completions (%)
2007-08	1117	1850	61
2008-09	667	786	85
2009-10	367	499	74
2010-11	404	548	74
2011-12	587	962	61
Total	3142	4645	68

3.30 Table 8 (above) shows that over the last five years windfall completions have consistently formed over half of the gross completions in the East Riding. Of the 4,646 gross completions in the last five years, 3,142 (or 68%) have been on windfall sites. They have

continued to come forward even in more recent times. This is considered compelling evidence that windfall sites have consistently become available and that a windfall allowance can be included in the five year supply.

3.31 The five year windfall allowance for the East Riding has been worked out as follows. The windfall allowance does not include dwellings likely to be built on garden land as the NPPF (Paragraph 48) states that any windfall allowance should not include residential gardens. The decision to make an allowance for garden land in the windfall allowance was supported by members of the working groups.

3.32 As Table 9 (below) shows, the annual average number of dwellings granted permission on windfall sites in the East Riding over the last five years was **693** dwellings.

Table 9 - Windfall permissions in the East Riding

	Windfalls granted planning permission
2007-08	941
2008-09	863
2009-10	377
2010-11	762
2011-12	520
Average	693

- Historic completion rates (based on the last five years of windfall site completions) indicates that, of the windfall sites granted permission in the last five years, on average:
 - 10% were completed by year 1 of their permission;
 - 25% were completed by year 2 of their permission (cumulatively);
 - 40% were completed by year 3 of their permission (cumulatively);
 - 50% were completed by year 4 of their permission (cumulatively);
 - 58% were completed by year 5 of their permission (cumulatively);

The above historic completions rates were used to project the windfall allowance expected to come forward in the East Riding over the next five years. The results are shown in Table 9 (below).

Table 10 - Calculating the windfall allowance

Year	Permissions granted	Dwellings complete by (cumulative):				
		Year 1	Year 2	Year 3	Year 4	Year 5
2012-13	693	72	171	278	345	405
2013-14	693		72	171	278	345
2014-15	693			72	171	278
2015-16	693				72	171
2016-17	693					72
Total						1,271

- The total number of dwellings that can be expected to be completed on windfall sites across the East Riding over the next five years **1,271**.
- A reduction was then made for the number of windfall dwellings likely to be built on garden land each year. Based on historical evidence of previous windfall completions this reduction was 17%. This avoids the inclusion of garden land in the five year supply.
- This allowed for the number of dwellings expected to be completed on windfall sites across the East Riding over the next five years to be determined (**1271 x 0.83**).
- The number of dwellings that can reasonably be expected to be completed on windfall sites across the East Riding over the next five years is **1,055**.

3.33 With regards to expected future trends, windfall sites are expected to provide a reliable source of supply, particularly as brownfield sites continue to be recycled, existing dwellings subdivided and empty (non-residential) buildings converted.

Non-Implementation Discount

3.34 Non-implementation of planning permissions is an important factor when calculating housing supply. Whilst the 5% buffer ensures choice and competition in the market for the supply of land, non-implementation looks to make realistic assumptions regarding housing delivery on the ground.

3.35 The number of plots approved over the last eleven years and the year they were built has been considered. The number of dwellings built after five years of being in the supply has fallen in recent years. At the peak of the market, implementation rates were around 90% after five years of being in the supply. As an average over the last three years, implementation rates by year five have been 74%, falling significantly from the previous years SHLAA, when implementation rates by year five were recorded as 85%. The

decrease can be accounted for by the low implementation of planning permissions approved in 2007-08 when the economic downturn hit the house building industry and many sites were at least temporarily abandoned.

3.36 Based on the above evidence, the following non- implementation rates, agreed and supported by the working groups, will be applied:

- A non-implementation rate of 20% will be applied to the first five years of the plan period, reflecting the current market downturn; and
- A non-implementation rate of 10% to be applied for the rest of the plan period, reflecting a return of the market to normality.

The discount rates will be applied annually to the supply.

4 Assessment Findings

Introduction

4.1 The different aspects of the methodology, as described and evidenced in the previous chapter, are applied to the sites feeding into the assessment. The fundamental purpose of the SHLAA is to identify a sufficient supply of housing sites to enable local planning authorities to plan ahead for fifteen years from the anticipated date of adoption of their Local Plan. This assessment is broken down into deliverable (0-5 years) and developable (6-10 years and 11-15 years). The presentation of the assessment findings are as follows:

Step 1: Identifying the existing supply

Assessing the total number of plots with planning permission, broken into small and large sites, as well as assessing the total number of plots from undeveloped allocations.

Step 2: Projecting the existing supply in a trajectory

Applying the methodology, the existing supply is projected across the plan period. Using this information a more detailed assessment of the five year supply can be prepared.

Step 3: Assessing the overall and potential supply

Determining whether the East Riding has a total fifteen year supply of specific, deliverable/ developable housing sites. Includes an assessment of potential supply.

Step 4: Identifying any potential for broad locations

If the East Riding does not have a fifteen year supply of deliverable and developable housing sites, broad locations for housing growth will need to be identified.

Step 1 - Identifying the existing supply

Existing planning permissions

Large sites

4.2 The remaining dwelling capacity of large sites with planning permissions as of 1 April 2012 is 2,546. Due to the projected 20% non-implementation of permissions, as well as considering build rates, it is anticipated that 1,927 of these could be built out in the first five years of the plan period, leaving little coverage in the 6-10 year and none in the 11-17 year supply period. The number of these dwellings that can be built on brownfield land over the plan period is estimated to be 613 or 32% of the total dwelling capacity of large sites (including non-implementation). These dwellings can be built over the first five years.

Small sites

- 4.3** The total number of plots on small sites with permission in the East Riding as of 1 April 2012 is 927. To avoid unrealistic projections of small sites, their completions are projected over the coming five year supply period using historical rates of completion (or implementation) from the previous five years. It is anticipated that of the total supply of small sites, 355 of these could be built out the first five years of the plan period. The number of dwellings that can be built on brownfield land over the plan period is 651, or 70% of the total dwelling capacity of small sites. Using the total number of dwellings with permission on brownfield sites over the plan period (651), the maximum number of dwellings built on small brownfield sites in the first five years is likely to be around 249 (i.e. $355 \times 70\%$).
- 4.4** The combined total of dwellings from small and large sites with permission is 3,473. The number of these that can be built in the first five years (after applying the non-implementation) is 2,282, 66% of the total number with permission. The number of these dwellings that can be built on brownfield land in the first five years is 862 dwellings.

Allocations

- 4.5** There are 66 undeveloped allocated housing sites (yet to be granted planning permission) from the four existing Local Plans in settlements in the settlement network. These sites have a total calculated capacity of 4,435 dwellings (after applying the non-implementation discount) to add to the supply within the plan period. The amount that can be delivered in the first five years is 2,922 dwellings.

Windfalls

- 4.6** A windfall allowance of 1,055 has been included in the five year supply. This is equivalent to 0.8 years of supply and does not include garden land.

The Five Year Supply

- 4.7** Table 9 (below) shows how much of the existing supply (large and small sites with planning permission, allocations and windfalls) is likely to come forward in the first five years, applying the methodology described above. The amount of existing supply that can be delivered in the first five years is 6,259. Comparing this figure to the five year residual requirement (including the additional 5% buffer) of 6,445 means that the East Riding as a whole has a **4.9 year supply**.
- 4.8** The supply per sub area varies. Table 10 shows that there is a **3.3 year supply in the Western sub area, 4.8 years in the Central sub area, 5.8 in the Northern sub area and 6.2 years in the Eastern sub area**. The Hull Housing Market Area has 46% of the total supply for the authority, exceeding the requirement for 40% of the authorities housing growth to occur in this area.

Table 11 - Five year existing supply position

	Central	Eastern	Northern	Western	Total	HHMA
Large sites with permission	466	458	546	458	1,928	808
Small sites with permission	69	105	107	74	355	110
Allocations	1050	846	485	540	2,922	1455
Windfalls	424	267	238	126	1,055	500
Total five year existing supply	2,009	1,676	1,376	1,198	6,259	2873
Annual residual target (including the 5% buffer)	420	270	236	363	1,289	492
Five year net residual target (including the 5% buffer)	2,100	1,350	1,180	1,815	6,445	2460
Years of total existing supply	4.8	6.2	5.8	3.3	4.9	5.8
Surplus/deficit in 5 year supply	-91	+326	+196	-617	-186	+413

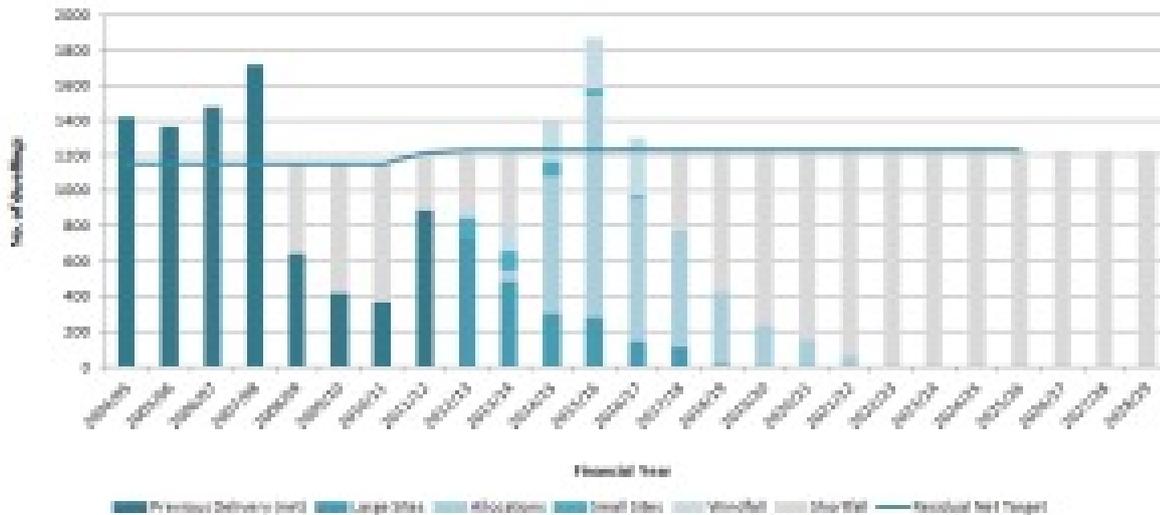
Please note - figures may not total due to rounding.

Step 2 - Projecting the existing supply in a trajectory

- 4.9** The housing trajectories below project the net figures for the existing supply to 2028-29 applying the methodology. The windfall allowance is also included within the first five years of the plan period. It is important to note that the trajectories are based purely on existing supply and do not include assumptions about potential supply. Potential supply is considered further through Step 3.
- 4.10** The trajectories are based on agreed build rates and pre-build lead in times which are applied pro rata for all sites and show a market recovery by 2014-15. In reality sites will come forward in a less predictable way which is impossible to predict with certainty. It is important to note that a 20% non-implementation discount has been applied to the existing supply in the first five years of the plan period and a 10% discount thereafter. These are rolling trajectories. New sites will be granted permission which will add to the supply as existing sites are built out.
- 4.11** As well as an overall picture for the East Riding, it is important to include a sub area breakdown, as the way housing is built across the authority area varies according to local circumstances.

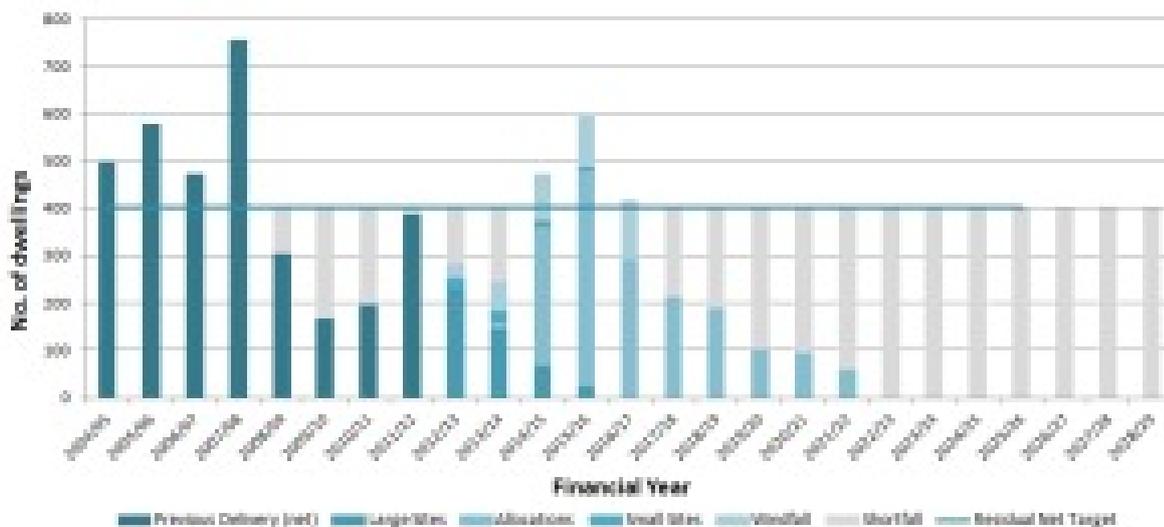
East Riding

4.12 The current supply from large sites with permission is due to be built out by 2018. As it stands, the existing supply is not expected to meet the current residual target until 2014-15. The year 2014-15 onwards shows a greater percentage of dwellings derived from existing undeveloped Local Plan allocations; these are expected to be built out by 2021-22.



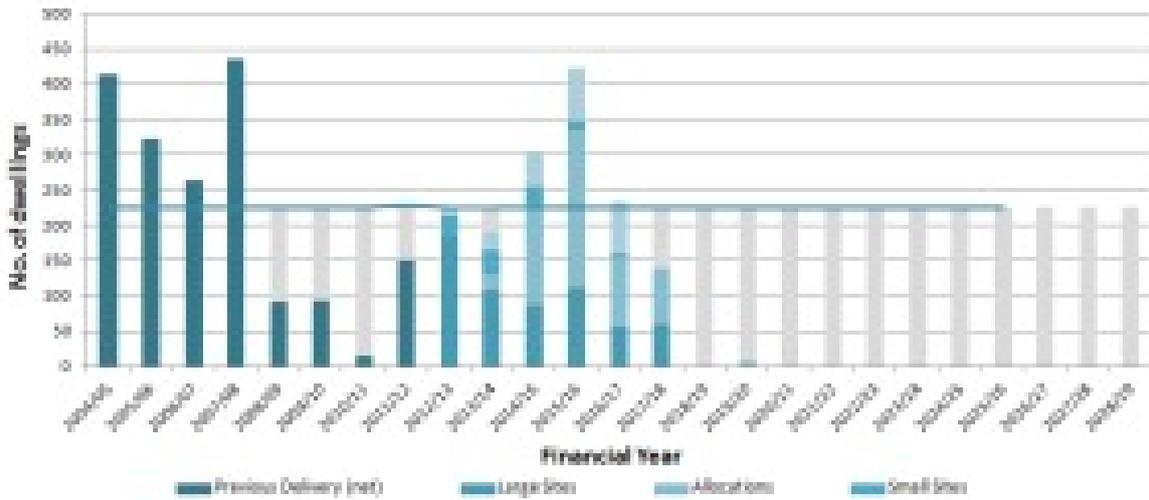
Central Sub Area

4.13 The Central sub area mirrors the overall trend for the East Riding over the course of the plan period. The existing supply meets the current residual target by 2014-15.



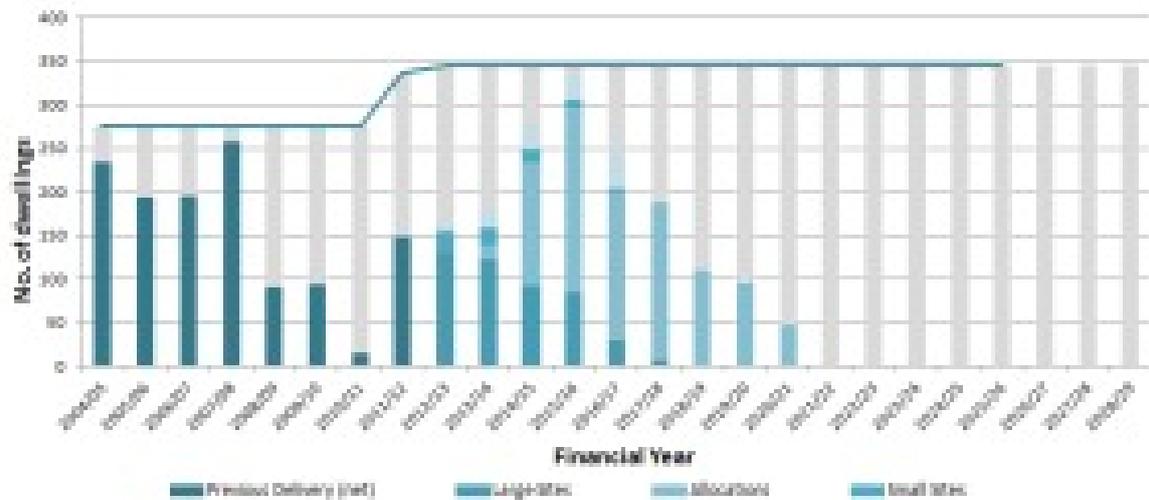
Northern Sub Area

4.14 The existing supply meets the current residual target by 2012-13. The supply from large sites with permission is expected to fall in 2013-14. This is as a result of large sites with permission being built out and no longer contributing to the supply. Completions from the existing supply are due to run out in 2020.



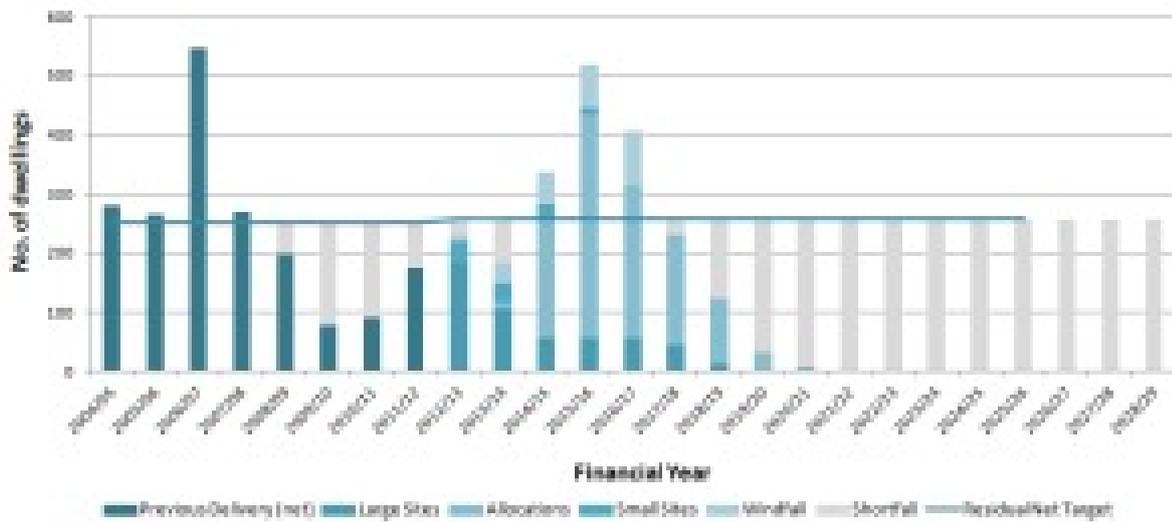
Western Sub Area

4.15 The Western sub area has consistently under provided against its annual target. Completions have increased this year compared with last year but the sub area is still under providing. In comparison with the other sub areas, the western sub area has a large amount of supply from allocated land.



Eastern Sub Area

4.16 The number of completions on sites with permission is higher in 2012-13. The high number of completions in this year is also attributable to the amount of local authority house building in the sub area. Past completions from the existing supply end in 2019-20.



Step 3 – Assessing the overall and potential supply

Assessment of potential sites

- 4.17** The above information clearly highlights the importance of assessing potential housing sites outside of the existing supply in order to identify a fifteen year supply of developable sites. After the initial sieving process relating to small sites, sites outside the Settlement Network and other sites in unsuitable locations, 601 potential sites remained to be assessed in the SHLAA.
- 4.18** The 601 sites have a potential capacity of 61,774 dwellings (after non implementation is applied). The amount which could theoretically come forward in the first five years is 37,063. These totals will, of course, decrease markedly once local policy constraints are considered through the preparation of the East Riding *Local Plan*. Table 11 (below) gives the complete supply position for all types of site across the entire plan period, as projected in the trajectory.

Table 12 - Total supply (including potential sites)

Site type	0-5 years	6-10 years	11-17 years	Total 2012-2026
Planning permissions (large sites)	1,927	123	0	2,050
Planning permissions (small sites)	355	*	*	355
Allocations	2,922	1,513	0	4,435
Windfall	1,055	*	*	1,055
Total five year existing supply	6,259	1,636	0	7,895
Potential sites	37,063	22,851	1,860	61,774
Total supply	43,322	24,487	1,860	69,669

Potential sites - brownfield land

- 4.19** In terms of the supply of brownfield land from potential sites in the SHLAA, 24 sites are entirely brownfield; these have a total net developable area of 104 hectares and a net capacity of 2,140 dwellings. 89 sites have a mixture of brownfield and greenfield land; the total net developable area of brownfield land within these mixed sites is 61 hectares, with a capacity of 1,834 dwellings. However, the density figure used to inform this calculation may not be appropriate for all mixed greenfield/brownfield sites and, therefore, this figure is indicative only.
- 4.20** The combined net developable brownfield area from each of these two types of sites is 165 hectares. This represents 3,974 dwellings.

Step 4 - Broad Locations

- 4.21** As it has been shown that the East Riding has a supply of suitable, available and deliverable sites, throughout and well beyond the plan period, it is not necessary to search for broad locations for development. The sites (or 'land bids') submitted to the Council for consideration by landowners and developers form part of the potential supply and will be considered for allocation through the East Riding *Local Plan* process.

5 Summary and Conclusions

- 5.1** The SHLAA has identified 806 sites, which have a total theoretical capacity to deliver 69,669 dwellings. After non-implementation has been accounted for, 2,282 of these dwellings could be provided on sites that currently have permission (both large and small sites) in the first five years. In terms of allocations, 4,435 dwellings could be provided on remaining undeveloped Local Plan allocations in settlements in the settlement network which do not have planning permission. The vast majority of the total dwelling capacity found in the SHLAA comes from potential sites: 61,774.
- 5.2** The amount of existing supply that can be delivered in the first five years is 6,259. Comparing this figure to the five year residual requirement of 6,445 (including the additional 5% buffer) means that as of 01 April 2012 the East Riding as a whole has a **4.9 year supply**. The existing supply comprises sites with permission, allocated sites and a windfall allowance.
- 5.3** The picture across the sub areas varies: the Eastern sub area has a 6.2 year supply, the Northern sub area has a 5.8 year supply, the Central sub area has a 4.8 year supply, and the Western sub area has a 3.3 year supply.
- 5.4** The SHLAA has shown 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. Potentially developable sites will be considered for allocation through the *Local Plan Allocations Document*.
- 5.5** The assessment has shown that the total number of dwellings from potential sites that could theoretically be built on brownfield land is 3,974.

Keeping the Assessment up to date

- 5.6** The SHLAA will be monitored and updated on an annual basis. The next update of the SHLAA (establishing the position as at 1 April 2013) will consider issues such as:
- What sites with planning permission are under construction and what progress has been made
 - What planning applications have been submitted or approved on sites identified in the assessment
 - Whether sites in the assessment are subject to preliminary negotiations or have been deferred to planning committee for delegated approval
 - What unforeseen constraints have emerged which means a site is no longer deliverable
 - Whether progress has been made in removing constraints to development and whether a site is now considered deliverable

- Whether the windfall allowance remains a realistic and reliable source of supply
- Whether a 5% supply buffer remains appropriate
- Whether the residual approach remains appropriate
- Changing national policy context and relevant evidence including the planned review of planning practice guidance
- Policy context provided by progression of the East Riding *Local Plan* (including the *Local Plan Strategy Document*, *Local Plan Allocations Document* and *Bridlington Town Centre Area Action Plan*).
- Other relevant socio-economic considerations impacting on the local economy, availability of finance and development rates
- The continued role and effective involvement of the working groups

5.7 All the above monitoring information will continue to be discussed and where possible agreed with the working groups before the SHLAA is updated year-on-year

Appendix A

SHLAA Working Groups

Core Working Group Members

- A forward planning officer from Hull City Council who is involved in the production of the Hull SHLAA
- 2 professionals representing national house builders (Linden Homes, Barton Willmore)
- 2 professionals representing local house builders (Risby Homes, Scruton Homes).

Wider Working Group Members

- Amec
- Barratt Homes
- Beal Homes
- Bellway Homes
- City of York Council
- Doncaster Metropolitan Borough Council
- Doug Jennings Planning Consultant
- East Riding of Yorkshire Council Officers (representing development management, regeneration and valuation/estates)
- Edwardson Associates
- Entec
- Homegroup Housing Association
- Globe Consultants Limited
- Hull City Council
- Leonards
- North East Lincolnshire Council
- North Lincolnshire Council
- Ryedale District Council
- Scarborough Borough Council
- Selby District Council
- Shirethorn
- Spawforths
- The Environment Agency
- The Highways Agency
- The Homes and Communities Agency
- Persimmon Homes
- Peter Ward Homes
- Walker Morris
- Wheldon Homes

Appendix B

SHLAA Site Assessments and Maps

<http://www2.eastriding.gov.uk/environment/planning-and-building-control/current-strategic-plans/housing-monitoring/?locale=en>

East Riding of Yorkshire Council will, on request, provide this document in Braille, audio or large print format.

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