



East Riding of Yorkshire Council

Strategic Housing Land Availability Assessment

Position at 1 April 2017

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Executive Summary

The Strategic Housing Land Availability Assessment (SHLAA) is an extensive survey of existing and potential housing sites in the East Riding. It is critical to both the determination of planning applications and as part of the monitoring and review process for the East Riding Local Plan.

The East Riding Local Plan Strategy Document sets out how the Council will distribute new housing provision in general. The East Riding Local Plan Allocations Document allocates specific sites that are consistent with this approach. The SHLAA does not in itself determine whether a site will be allocated for housing.

The National Planning Policy Framework (NPPF) states that local planning authorities must identify a deliverable five year supply of housing sites. Footnote 11 of the NPPF states that to be considered deliverable, sites should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.

Planning Practice Guidance (PPG) (Paragraph 001, 3-001-2014306) provides more detailed advice for carrying out a SHLAA, supporting the advice contained in the NPPF. It sets out that a land availability assessment should:

- identify sites and broad locations with potential for development;
- assess their development potential; and
- assess their suitability for development and the likelihood of development coming forward (their availability and achievability).

The 2017 SHLAA takes into account housing completions and other information (including planning permissions and site where permission has lapsed) to calculate the five year housing land supply position at 1 April 2017. It has been prepared in accordance with the NPPF, PPG and other relevant guidance. A core working group, made up of council officers, representatives from the house building sector and other stakeholders was established to develop and review (as required) the methodology. The methodology applied to the assessment of sites was based on robust and up to date evidence and was, as far as possible, agreed with the working group.

In reviewing the level of net housing completions since the start of the plan period in 2012 (4,354) against the Local Plan housing requirement over the same period (7,000), a shortfall of 2,646 dwellings has been identified. This shortfall is added to the next five year period, resulting in an annual residual housing requirement of 2,315 dwellings, a total five year requirement total of 11,575. The annual residual housing figure includes an additional 'buffer' of 20 percent in terms of housing land supply to ensure choice and competition in the market for land.

Executive Summary

The assessment finds that there is a deliverable supply of land to accommodate 12,500 dwellings available in the first five years. This principally comprises:

- large and small sites with planning permission (6,745 dwellings);
- sites allocated in the East Riding Local Plan (4,483 dwellings); and
- a windfall site allowance (1,272 dwellings)

The report identified that there is a further developable supply of 9,971 dwellings beyond year five, concluding that there is no need to outline any broad growth areas.

I Introduction

Background to the Assessment

- 1.1 In order for local planning authorities to identify sufficient land to meet their housing requirements, the National Planning Policy Framework (NPPF) sets out the need to carry out an assessment of land availability. The Strategic Housing Land Availability Assessment (SHLAA) is an extensive survey of potential housing sites in the East Riding. It is critical to both the determination of planning applications and as part of the monitoring and review process for the East Riding Local Plan.
- 1.2 It is important to note the distinction between the SHLAA and the East Riding Local Plan (principally made up of the Strategy Document and Allocations Document). The Strategy Document sets out how the Council will distribute new housing provision in general. The Allocations Document allocates specific sites that are consistent with this approach. The SHLAA does not in itself 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.
- 1.3 The 2017 SHLAA provides the housing land supply position at 1 April 2017.

Context

- 1.4 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 (NPPF) (March 2012)
- National Planning Practice Guidance (PPG) (March 2014) and as updated

The 'Development Plan'¹

- East Riding Local Plan Strategy Document (adopted April 2016).
- East Riding Local Plan Allocations Document (adopted July 2016).
- Bridlington Town Centre Area Action Plan (AAP) (adopted January 2013).

Other evidence and considerations

- Housing Market Area Position

¹ The supply position in this report is of 1 April 2016, but for simplicity, reference is made to allocations as set out in the Allocations Document adopted in July 2016.

- Planning permissions and recent completions
- Development Viability

National Policy

The National Planning Policy Framework

- I.5 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. Local planning authorities are 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.
- I.6 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.**
- I.7 In addition, a further supply of specific developable sites for years six to fifteen 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 fifteen years, broad locations for future growth should be identified.
- I.8 The NPPF identifies the need to consider:
- A supply buffer - local planning authorities are required to include an additional allowance or 'buffer' of five percent (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 percent buffer (paragraph 47) to provide a realistic prospect of achieving the planned supply.
 - 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).

- 1.9 Paragraph 49 of the NPPF states that 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.

Planning Practice Guidance

- 1.10 On 6 March 2014 the Department for Communities and Local Government (DCLG) published the planning practice guidance accompanying the NPPF. Paragraph 31 of the PPG provides further clarity on what might constitute a 'deliverable' site:

“Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within 5 years.”

- 1.11 This has been used to determine the approach taken in this document.

The Development Plan

Local Plan Strategy Document (April 2016)

- 1.12 The Strategy Document was adopted in April 2016. This 2017 SHLAA is based on a housing requirement of 1,400 (net) dwellings per annum, identified in the Strategy Document. The settlement network identified in Policy S3 of the Strategy Document helps to determine which sites are included in the SHLAA. For clarity, the settlements included within the SHLAA are listed in Chapter 3 (table 5). Where a site has planning permission for development in a settlement not identified in the network, this is still included in the SHLAA where the assessment concludes it is deliverable.

Allocations Document (July 2016)

- 1.13 The Allocations Document was adopted in July 2016. The Allocations Document contains policies that guide the development of specific sites. It was prepared following extensive consultation with residents, Town and Parish Councils, the development industry, other organisations and statutory bodies.

Bridlington Town Centre Area Action Plan (January 2013)

- 1.14 An Area Action Plan (AAP) for Bridlington Town Centre was adopted by the Council in January 2013. The AAP sets out the Council's strategy and vision for the Bridlington Town Centre area and the approach for achieving the changes needed in the Town Centre and Harbour area over the period to 2021, including residential development. It is accompanied by a Town Centre and Marina Supplementary Planning Document (SPD) that provides the detailed design guidance for the delivery of the development proposals set out in the AAP.

Other Evidence and Considerations

Housing Market Area Position

1.15 Planning Practice Guidance (PPG) (Paragraph 001, 3-007-2014306) states the area selected for the housing land availability assessment should be the relevant housing market area. Together, the East Riding and Hull local authority areas collectively make up the Housing Market Area. Therefore, for completeness, the housing land supply across the Hull City Council authority area is presented in section 4. Hull City Council are a key stakeholder in the preparation of the SHLAA.

Recent Completions

1.16 Table I shows the annual housing completions in the East Riding for 2016-17. The gross figure indicates the total number of dwellings completed in 2016-17. The net completions figure reflects the losses from dwelling conversions, change of use and demolitions.

1.17 The Strategy Document (Policy S5) requires approximately 45 percent of the total housing provision in the East Riding to be located in the Beverley & Central and Holderness & Southern Coastal sub areas over the plan period. These areas reflect where the interactions between the City of Hull and those settlements in the East Riding are the strongest.

1.18 In the period 2016-17, 714 of the 1,159 (net) completions in the East Riding (62 percent) were located in the Beverley & Central and Holderness & Southern Coastal sub areas. The SHLAA reviews completions in the Beverley & Central and Holderness and Southern Coastal sub areas on an annual basis to ensure that, over the lifetime of the East Riding Local Plan, this target is met.

Table I Housing completions 2016-17

Local Plan Sub Area	Gross	Net
Beverley & Central	673	650
Bridlington Coastal	64	14
Driffield & Wolds	63	57
Goole & Humberhead Levels	90	78
Holderness & Southern Coastal	93	64
Vale of York	305	293
Total	1,291	1,159

Development Viability

1.19 Paragraph 173 of the NPPF states:

"to ensure viability, the costs of any requirements likely to be applied to the development, such as requirements for affordable housing, standards, infrastructure

contributions or other requirements should, when taking into account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable".

- 1.20 Paragraph 47 (footnote 11) of the NPPF provides further information on viability in the context of housing land supply assessments. This clarifies that in order to be considered deliverable, sites should be viable. Developable sites are those which could be viably developed at the point envisaged.
- 1.21 The 2017 SHLAA applies information from the viability analysis supporting the Community Infrastructure Levy (CIL) Draft Charging Schedule. This included testing the viability of a range of development schemes across different housing value areas using a residual valuation model to ascertain which schemes/locations are currently viable. The model takes into account costs required as a result of development plan policy, for example, affordable housing. Greenfield and brownfield schemes between 0.5-10 hectares and at a density between 30 - 40 dwellings per hectare were tested. This range of sites best represents the sites being put forward in the current market. Strategic allocations were considered in more detail as there needs to be an understanding that such sites are deliverable, taking into consideration the possible additional infrastructure requirements for delivering such sites.

Performance and Residual Targets

- 1.22 In 2016-17, the net housing completions figure for the East Riding was 1,159 dwellings. The gross and net completions for the 2016-17 were the highest recorded in the plan period so far. With the exception of Driffield and the Wolds and Goole & Humberhead Levels, all sub areas saw an increase in completions compared with the previous year. The Beverley and Central Sub area saw a significant increase in completions in 2016-17 of 50% on the 2015-16 figure. In previous years, the Bridlington Coastal sub area recorded relatively high completions, however in 2015-16 and 2016-17 there was a significant number of demolitions as part of the Bridlington Area Action Plan, which accounts for the low net figure.
- 1.23 Within the East Riding, the housing requirement has not been met since 2008-09 (reflecting the economic downturn). However, in the ten years before the downturn (2007-08), the Council demonstrated consistent over delivery against its housing requirement. Despite the long period of over delivery before the downturn, the 2017 SHLAA continues to provide a 20 percent buffer in recognition of aim of the NPPF (refer to paragraph 1.8 above) to increase housing delivery.
- 1.24 Table 2 shows how the five year housing requirement for the East Riding has been calculated, taking into account housing shortfall from 2012-13 (start of the East Riding Local Plan period), including a 20 percent buffer.

I Introduction

Table 2 Housing completions and residual housing requirement

		Total
A	Net completions (2012 - 2016/17)	4,354
B	Local Plan housing requirement (per annum)	1,400
C	Local Plan requirement (2012 - 2016/17)	7,000
D	Shortfall [C-A]	2,646
E	Shortfall [D / 5 years]	529
F	Annual residual requirement for five year period (including 20% buffer) [B+E+20%]	2,315
G	5 year residual requirement (including 20% buffer) [F x 5]	11,575

- I.25** Reviewing the level of net housing completions since the start of the plan period against the four year Local Plan housing requirement means that a shortfall of 2,646 dwellings can be identified (7,000 minus 4,354 net completions). In order to boost housing delivery, the 20 percent buffer has been added to the five year housing requirement and shortfall, i.e. (Housing requirement + shortfall) + 20 percent buffer. This approach to applying the buffer is endorsed in recent appeal decisions and was supported by the working group (see Chapter 3).
- I.26** The approach seeks to address the shortfall in the next five year period, demonstrating the Council's commitment to boosting the supply of housing. This is commonly referred to as the 'Sedgefield' approach and is recommended (but not required) in the PPG (Paragraph 35, 3-035-20140306). The Planning Inspector's Report on the Strategy Document concluded the application of the 'Sedgefield' approach was appropriate.
- I.27** Front loading the shortfall and applying a 20 percent buffer results in an annual residual housing requirement of 2,315 dwellings for the first five years, or a total five year requirement of 11,575 dwellings. **This figure is used to determine the five year housing land supply position in the East Riding.**
- I.28** The 20% buffer means that the supply requirement is much higher than the actual delivery requirement to meet the needs set out in the Local Plan. This need is also over a longer period than 5 years. Standard approach to assessing local housing need
- I.29** On 14th September, the Department for Communities and Local Government began a consultation which sets out a number of proposals to reform the planning system to increase the supply of new homes and increase local authority capacity to manage growth. This includes a proposal to introduce a standard method for calculating housing need.
- I.30** The indicative assessment of housing need in the East Riding is 991 dwellings per annum. Depending on how the Government takes this approach forward, future reviews of the Local Plan and supply position may be based on different figures to the current requirement of 1,400 dwellings per annum.
- I.31** The Housing Market Area's position will also be impacted. The indicative annual housing requirement for Hull's is 409 dwellings per annum.

Brownfield Completions

I.32 Policy S5 of the Strategy Document seeks to ensure at least 20% of new housing is built on brownfield land. Table 3 shows the performance of the Council in supporting the re-use of previously developed land (PDL) since the start of the plan period (2012). In 2016-17 there was an increase in the number of gross completions located on brownfield land (32%, however this is still below the proportion of Brownfield completions between 2012 and 2015). A general reduction was anticipated to account for the fact that the Local Plan allocates a significant number of greenfield sites to meet requirements to 2029. The development of the allocated sites are being reflected in the later years, presented in the table below.

Table 3 Brownfield completions

Financial Year	Brownfield Completions	Total Completions (gross)	% Brownfield Completions
2012-13	563	997	56
2013-14	400	905	44
2014-15	361	844	43
2015-16	260	1,000	26
2016-17	406	1,291	32
Total	1,990	5,037	40

Planning Approvals

I.33 Since 2012, the number of approvals of both outline and full applications in the reporting year has risen significantly, with almost 10,000 plots approved in the last three years alone². This demonstrates the effectiveness of having a Local Plan in place that specifically allocates sites for housing development.

Table 4 Planning Approvals

Financial Year	Number of plots approved
2012-13	878
2013-14	1,619
2014-15	3,816
2015-16	1,995
2016-17	4,122
Total	12,430

² There may be an element of double counting as the figures include both outline and reserved matters applications, as well as replacement applications on previously approved sites.

2 Consultation

Establishing a Partnership

- 2.1 National planning practice guidance stresses the importance of a partnership approach, with local planning authorities and other key stakeholders working together in a joined up way. 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 City of York Council, Doncaster Metropolitan Borough Council, Hull City 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, comprising people who are central to the SHLAA development process. The members are invited to meetings to represent their wider groups throughout the SHLAA process.
- 2.4 The 2017 core working group consists of:
- professionals representing national house builders (Barratt and David Wilson Homes, Linden Homes, Persimmon Homes);
 - professionals representing local house builders (JG Hatcliffe and Partners, Peter Ward Homes, Risby Homes, and Scruton Homes);
 - planning policy officers from City of York Council and Hull City Council involved in the production of their respective SHLAAs; and
 - a planning officer from the Development Management section of East Riding of Yorkshire Council.
- 2.5 The second working group, which does not meet in person, is the wider consultation group, including:
- the Environment Agency;
 - the Home Builders Federation;
 - Highways England; and

- a range of other house builders and agents.³

2.6 Both working groups had an opportunity to comment on the proposed SHLAA methodology. Composition of the 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.

2.7 The East Riding's many cross-border issues with Hull, means an officer from Hull City Council has a place on the core 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. A Joint Planning Statement between Hull City Council and East Riding of Yorkshire Council has also been prepared, setting out the strategic issues affecting both authorities, including housing.

Consultation

2.8 Developing the SHLAA methodology involved setting up a meeting with the core working group and a formal consultation on the draft methodology with both groups. The methodology will continue to be reviewed annually to reflect new guidance and local circumstances, in consultation with the groups.

Developing the Methodology

2.9 The draft methodology presented data and outlined the proposed approach for the following elements of the SHLAA:

- draft housing completion figures;
- residual housing requirement and the methodology for applying the buffer;
- sources of five year (deliverable) supply;
- non-implementation of sites;
- lapsed sites;
- developable area assumptions;
- density assumptions;
- development viability;

³ A full list of members is included in Appendix A

2 Consultation

- pre-build lead-in times; and
- build rates.

2.10 The draft methodology was circulated to both working groups for formal consultation. This was an opportunity for members of the working groups to submit their own evidence to support their position, should it be different from the Council's. All responses to the consultation were considered and taken into account during the production of the final SHLAA report. Appendix B provides a summary of responses submitted to the consultation.

2.11 Individual pro-formas were also sent to landowners/ agents/ developers to understand specific approaches on an individual site basis.

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

3 Methodology

Good Practice

3.1 The PPG (Paragraph 001, 3-001-2014306) provides more detailed advice for carrying out a SHLAA, supporting the advice contained in the NPPF. It sets out that an assessment of land availability should:

- identify sites and broad locations with potential for development;
- assess their development potential; and
- assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

3.2 In drawing up the methodology, the Council also considered guidance published by bodies such as the Planning Advisory Service (PAS), as well as considering the outcomes from planning appeals and High Court judgments across the country. As noted previously, working in partnership with the development industry to develop the methodology has been crucial to understanding the relevance and accuracy of the assumptions set out in this chapter.

Assessed Settlements

3.3 The Settlement Network in the Strategy Document (Policy S3) helps to determine the settlements included within the SHLAA. The list of settlements included in the SHLAA are illustrated by Figure 1 and listed below in Table 5. Where a site has planning permission for development in a settlement not identified in the network, this is included in the SHLAA where the assessment concludes it is deliverable.

Figure 1 The East Riding Settlement Network

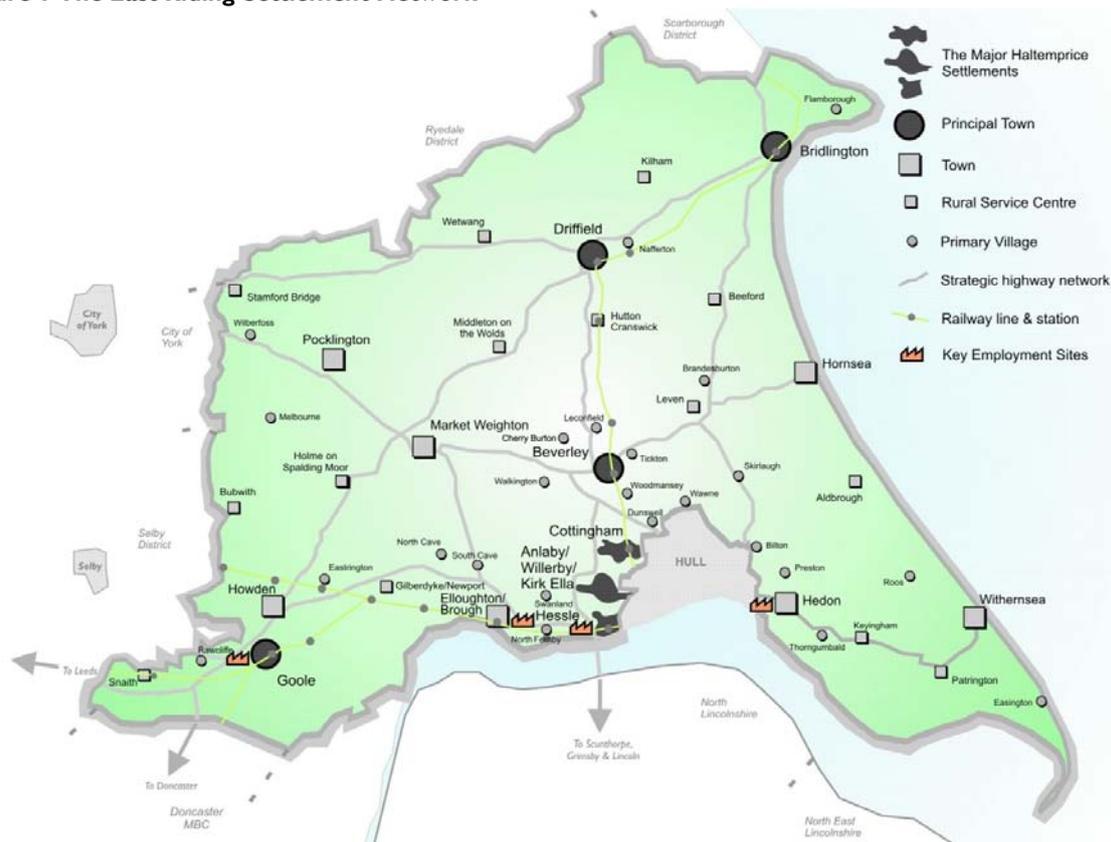


Table 5 The East Riding Settlement Network

Major Haltemprice Settlements		
Anlaby	Cottingham	Hessle
Kirk Ella	Willerby	
Principal Towns		
Beverley	Bridlington	Driffield
Goole		
Towns		
Elloughton Cum Brough	Hedon	Hornsea
Howden	Market Weighon	Pocklington
Withernsea		
Rural Service Centres		
Aldbrough	Beeford	Bubwith
Gilberdyke/Newport	Holme on Spalding Moor	Hutton Cranswick
Keyingham	Kilham	Leven
Middleton on the Wolds	Pratington	Snaith
Stamford Bridge	Wetwang	
Primary Villages		
Bilton	Brandesburton	Cherry Burton
Dunswell	Easington	Eastrington
Flamborough	Leconfield	Melbourne
Nafferton	North Cave	North Ferriby
Preston	Rawcliffe	Roos
Skirlaugh	South Cave	Swanland
Thorngumbald	Tickton	Walkington
Wawne	Wilberfoss	Woodmansey

Populating the SHLAA

3.4 Sites in the SHLAA are put into three broad categories: 5 year (deliverable) supply, 6-15 year and 'potential' supply.

A. The five year supply

3.5 The Council has identified a supply of deliverable sites within the SHLAA from the following sources, where they can be either fully or partially delivered within the five year period and where they meet the definition of a 'deliverable' site as set out in the NPPF and PPG:

- large and small sites with planning permission or delegated approval;
- selected housing allocations within the Allocations Document; and
- suitable sites on the Brownfield Register.

3.6 A windfall site allowance is also included within the deliverable supply. This is based on historic data.

3.7 These sources of supply are covered in more detail in the paragraphs that follow.

Sites with Planning Permission

Large sites with planning permission

3.8 Large sites are classed as having five or more dwellings with either outline or full permission which remain either entirely or partially undeveloped at 1 April 2017.

Small sites with planning permission

3.9 Small sites are classed as having fewer than five dwellings with either outline or full permission which remain either entirely or partially undeveloped at 1 April 2017. An assumption, based on historic trends, is made to determine how many dwellings from this source are likely to be completed within the five year period. These sites are not included on the SHLAA maps (see Appendix C) nor listed in the SHLAA spreadsheet on account of their size.

Sites deferred for delegated officer approval

3.10 Planning applications which, at 1 April 2017, were deferred for delegated officer approval are included in the five year supply. These are sites where the planning committee has considered them and agreed that the application be approved subject to certain outstanding elements being resolved to the satisfaction of officers (for example, because a Section 106 legal agreement is required to secure affordable

housing). The working group did not raise any concerns on the principle of including sites deferred for delegated officer approval in the five year supply.

Lapsed sites

- 3.11 Policy AD1 of the Allocations Document supports development on existing residential commitments where they are consistent with the approach in the Strategy Document. Where a previously identified planning permission has lapsed (at 1 April 2017) but the site is shown as an existing commitment on the Policies Map, the Council has investigated the publicly available planning history, and where relevant, contacted the applicant to consider whether the site can still be considered deliverable.

Selected housing allocations within the Allocations Document

- 3.12 The 2017 SHLAA will continue to include other deliverable East Riding Local Plan allocations (i.e. those not benefiting from a live planning approval) as part of the 5-year supply. This approach is based on the fact that these sites have been tested through examination, and also on the basis of a site by site assessment reflecting the latest available information on delivery.
- 3.13 The results of the CIL Viability analysis demonstrate the majority of sites within the five year land supply are viable and can be developed in accordance with footnote 11 of the NPPF. In some instances, the study indicates sites are not likely to be viable at current costs and values. These sites are not included within the deliverable five year land supply unless there is additional evidence to demonstrate delivery of the site, for example, there may be investment/strategies available to facilitate delivery of the site or evidence of recent market activity.

Brownfield Register

- 3.14 In 2016 the Council produced a Brownfield Register as part of a national pilot scheme. The Town and Country Planning (Brownfield Land Register) Regulations 2017 now requires local authorities to prepare and maintain registers of brownfield land that is suitable for residential development. Whilst the majority of the sites on the register are sites with planning permission or are Local Plan Allocations, some additional suitable sites have been identified as deliverable. All sites included in the Brownfield Register are included in the SHLAA, but are also available to view as a separate document:
- 3.15 For the practical purposes, the Register forms a sub-set of data within the SHLAA. Sites on Part 1 of the Register have been subject to the same assessment process employed in the SHLAA.

A Windfall Site Allowance

3.16 A windfall allowance is included within the five year supply. This is consistent with the NPPF (paragraph 48) and the PPG (Paragraph 24, 3-24-20140306). The windfall allowance is realistic and based on historic evidence (see paragraphs 3.32-3.37)

B. The 6-15 year supply

3.17 The 6-15 year supply consists of dwellings from sites;

- identified in the Allocations Document which, after applying the assumed build rates and lead- in times, will not be completely built out in the initial five year period because they are large sites.
- with a current planning permission which, after applying the assumed build rates and lead- in times, will not be completely built out in the initial five year period because they are large sites.
- identified in the Allocations Document which have had their lead-in time increased beyond five years to reflect that the site is developable but not likely to come forward in the next five years. The site specific adjustment of the lead-in time will result in these sites being identified in the 6-15 year supply.

C. Potential supply

3.18 The potential supply is made up of 'land bids' and other sites, which do not benefit from planning permission and are not in the Allocations Document.

3.19 Land bids are sites that were put forward by landowners and developers for consideration through the East Riding Local Plan. Many sites were rejected through the plan making process for a range of reason including, in some cases, the fact that there were better options available. They usually take the form of unallocated greenfield land outside of development limits, but include a variety of forms, including land currently in use for other non-housing uses. A number of sites in the potential supply are developable, whereas others are likely to be undevelopable due to different constraints (e.g. flood risk, remoteness, suitability). Land bids received in the reporting year are included in the potential supply.

The Assessment

3.20 Appendix B sets out the results of the individual site assessments. The SHLAA was populated with the following fields:

3 Methodology

Table 6 SHLAA Fields

Local Plan Sub Area	The name of the Local Plan sub area the site is located in.
Settlement Hierarchy	Where the settlement is placed in the Settlement Network (see Table 5).
Settlement Name	Location of site.
Allocations Ref	Local Plan allocations reference where applicable
PP Reference	Should the site have planning permission, this is the planning application reference for the site.
Suffix	Indicates whether the site is classed as: a site with planning permission (PP), a site identified in the Allocations Document (AD) (without planning permission), or a potential site (PS).
SHLAA ID	The unique reference number for the site. This cross-references to the sites shown on the map in Appendix B.
Location	Short description of where the site is located.
Planning Permission Allocation	An indication as to whether the site has planning permission.
Allocation extent of site	An indication as to whether the site is allocated in the Local Plan.
Potential Site	Should the site be an allocation, this column indicates whether the site forms part or all of the draft allocation site boundary.
Lapsed Site	An indication as to whether the site is a 'potential site'.
Deferred Site	Site has a lapsed planning permission at 1 April 2016 and the ongoing deliverability of the site has been assessed on a case by case basis.
Delayed Site	Sites which, at 1 April 2016, were deferred for delegated officer approval and included in the five year supply on that basis.
In 5 year supply?	Site with an increased lead-in time.
Date of permission	An indication as to whether the site is included in the 5 year supply.
Permission started?	The date the notice of decision was issued, should the site have planning permission.
Permission Expiry Date	An indication as to whether works have commenced on-site, should the site have planning permission.
Reason Considered	The date the permission will expire (lapse), should the site have planning permission.
Area (ha)	Information showing what source the site came from, e.g. a land bid, housing allocation, etc.
Developable area ratio	Gross area of the site measured in hectares (ha).
Developable area (ha)	The area of the site considered purely developable for housing (%) <i>Sites with planning permission have already had their developable area approved through the development management process. All other sites follow the developable area assumptions except for some allocations which have had their assumptions adjusted to account for special on-site circumstances.</i>
Density	The area of the site in hectares (ha) considered developable.
Net capacity	The number of dwellings which can be built on the site per hectare (ha) of the site area. <i>Sites with planning permission have already had their density approved through the development management process.</i>
Capacity remaining	The estimated number of dwellings that can be accommodated onto the net site area. For sites with permission, this number represents the total number of dwellings given by the most recent permission on the site.
GF/BF	In the case of sites with planning permission, this figure shows the remaining number of dwellings still to be complete if development has already started. This figure will be the same as net capacity for all other types of sites.
	An indication as to whether the site is greenfield land (GF), brownfield land

	(BF), or a mixture of both.
% PDL	The area of the site considered to be previously developed land (PDL)(%).
Total PDL Area	The estimated area of land in hectares (ha) considered to be previously developed.
Net developable PDL Area	The estimated area of developable land in hectares (ha) considered to be previously developed.
National Policy Restrictions	Relevant national policy designations <i>Sites of Special Scientific Interest (SSSI)</i> <i>Ramsar Sites, Special Protection Areas (SPA)</i> <i>Special Areas of Conservation (SCA)</i> <i>National Nature Reserves (NNR)</i> <i>Scheduled Monuments, Ancient Woodlands</i> <i>Health and Safety Executive Inner Zones</i> <i>Flood Risk areas - Zone 3b 'Functional Floodplain'</i>
Risk of Flooding	Data relating to the risk of flooding using the EA flood maps and council SFRA's.
Suitability Assessment	An assessment of the suitability of the site, includes issues that would need to be overcome through the planning application process e.g. access to the site, neighbouring uses, proximity of waste water treatment works, contamination, topography and mineral designations, etc.
Availability	Details of the owner/s and/or representative/s of the site.
Housing Market Viability Area	The viability area applied in the CIL Viability Study.
Viability result	An indication as to whether the site is viable, applying the CIL Viability Study.
Viability assessment	A conclusion on site viability, applying the CIL Viability Study and other information/evidence as relevant.
Overcoming constraints	A range of potential solutions for any constraints.
Site additional delivery comments	Any additional information with regards to the deliverability of the site. <i>Should the site be identified as an allocation in the Local Plan, this column may indicate when the Council expects to receive a planning application.</i>
Lead in time (years)	The time from the point of approval of a planning application to the expected completion of the first plot.
Build rates	The number of dwellings expected to be built each year
Overall Deliverability	How long the site will take to develop (in years).
Dwellings which can physically be built in 0-5 years	The number of dwellings which can physically be built in this year.
Dwellings which can physically be built in 6-10 years	The number of dwellings which can physically be built in this year.
Dwellings which can physically be built in 11-15 years	The number of dwellings which can physically be built in this year.

Calculating Density

- 3.21 The PPG (Paragraph 17, 3-017-20140306) looks to development plan policy to identify the development potential of each site with regards to density assumptions. It states: *"the estimation of the development potential of each identified site should be guided by the*

existing or emerging plan policy including locally determined policies on density". In light of this guidance, Policy H4 of the Strategy Document has been used to apply a density assumption to the SHLAA sites without planning permission.

- 3.22 Policy H4 encourages development to achieve a density of at least 30 dwellings per hectare (dph). Where a site is within close proximity of a Town or District Centre or a railway station or core bus route within the Major Haltemprice Settlements, Principal Towns or Towns, the policy seeks to achieve more than 30 dph. On this basis, a density of 30 dph has been applied to the net developable area of all sites without permission unless they would reasonably be expected to achieve a higher density rate, where a rate of 35 dph has been applied. The Council will seek to ensure development proposals make the most efficient use of land to fulfil this policy and will also have regard to the policy aimed at achieving a mix of housing where appropriate.
- 3.23 The density assumptions are only applied to sites without permission. A significant number of allocations already have information agreed with regards to density (in the form of committed numbers of dwellings) through a planning application and resolution.

Calculating Developable Areas

- 3.24 On large sites, the working group continued to agree 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.
- 3.25 The net developable area includes those 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, significant landscape buffer strips, open space serving the wider surrounding area, or an area necessary to make space for significant water storage;
 - an existing on-site feature or wider constraint that limits the area that can be developed, such as the need to maintain an important landscape or wildlife site; and
 - areas comprising non housing development, such as employment, commercial uses or community facilities (such as a new school or health centre).
- 3.26 The 2017 SHLAA continues to apply assumptions to sites without planning permission (see Table 7). On-site features affecting the developable area of Local Plan allocations

have been accounted for in developing the indicative capacity figures set out in the Allocations Document.

Table 7 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 or more	75

Pre-build lead-in times: 5 year supply sites

3.27 For clarity, the pre-build lead in time is the period of time from the point of approval of a planning application (notice of decision) to the completion of the first plot(s). For Local Plan allocations without planning permission, the lead-in time is from 1 April 2017 to completion of the first plot(s). The assumed pre-build lead-in times applied to the five year supply sites in the 2017 SHLAA are shown in Table 8.

3.28 Feedback from the SHLAA Core working group suggested previous SHLAA assumptions may not necessarily reflect the lead-in times of smaller sites (fewer than 50 units). In response to this feedback, this SHLAA has increased the lead-in times by six months for sites with fewer than 50 plots (shown in Table 8).

Table 8 5 year supply lead in times

	Fewer than 50 plots	More than 50 plots
Local Plan allocations without planning permission	36 months	36 months
Outline planning permission	30 months	30 months
Reserved matters/full planning permission	18 months	18 months

3.29 The above assumptions will continue to be applied to all five year supply sites unless credible information has been provided by industry professionals to suggest the assumptions are not relevant for individual sites or there are site specific considerations to take into account.

3.30 There are a small number of allocations where the Council is aware that the site is developable but is unlikely to be brought forward in five years. These sites have had their lead-in times increased accordingly.

3.31 No lead-in time has been applied to sites which have already started because these sites have effectively 'used up' their lead-in-time. It was agreed that the above assumptions be used as a broad-brush approach.

Build rates for large sites

3.32 The build rate is an estimate of how many dwellings can be built on a site in a year.

3 Methodology

3.33 Build rates are affected by factors such as the prevailing market conditions, availability of finance; the number of developers on a site and their capacity to build out the site.

3.34 A review of confirmed build rates, information from industry professionals and other LPA assumptions suggests it would be appropriate to retain the 2016 rates. The assumed rates, shown in Table 9 (below), have been applied to all five year supply sites unless:

- credible information has been provided by industry professionals to suggest the assumptions are not relevant for individual sites; and/or
- following planning permission, the Council is aware of how many developers are developing a site, enabling the build rate to be adjusted accordingly.

Table 9 Annual Build Rates

Size of site	2016-17 onwards (normal rate)
Fewer than 10 units	8
Fewer than 50 units	25
Fewer than 200 units	35
Fewer than 400 units (assuming 2 developers)	60
400 or more units (assuming 3 developers)	90

Calculating a windfall allowance

3.35 A windfall site is a site not specifically allocated for development but which unexpectedly becomes available for development. Table 10 (below) shows that windfall completions have formed just under half of the gross completions in the East Riding in the last two years. The proportion of windfall sites completed has decreased, most likely due to Local Plan sites coming forward. However, the absolute numbers have been relatively stable over the last three years (c. 500 dwellings per annum). The number of windfall completions in 2016-17 was above 500 dwellings.

3.36 Table 10 shows that of the 5,037 gross completions in the last 5 years, 2,976 (or 59 percent) have been on windfall sites. They have continued to come forward even in more recent times. This is compelling evidence that windfall sites have consistently become available and that a windfall allowance can continue to be included in the five year supply.

Table 10 Windfall Completions in the East Riding

	Windfalls completed	Gross completions	Windfalls completed as a percentage of annual gross completions (%)
2012-13	700	997	70
2013-14	758	905	83
2014-15	543	844	64
2015-16	461	1000	46
2016-17	514	1,291	40
Total	2,976	5,037	59

3.37 The number of approvals on windfall sites has been consistently high and has continued to increase year on year. The largest proportion of these (44%) are small sites below 5 dwellings, 41% are on medium sites (5 – 50 dwellings) and just 15% are on large sites (50+ dwellings).

3.38 A relatively conservative assumption of 600 approvals is being taken forward. Using historic rates of completions (74% completed by year five of their planning permission), this leads to the results in Table 12.

Table 11 Windfall Approvals⁴

Year	Windfalls approved	Allocation sites approved	Total	Windfall (%)
2012-13	563	315	878	64%
2013-14	600	1,019	1,619	37%
2014-15	610	3,206	3,816	20%
2015-16	908	1,087	1,995	46%
2016-17	963	3,159	4,122	23%
Total	3,644	8,786	12,430	30%
Average	729	1,757	2,486	29%

Table 12 Calculating the windfall allowance

Year	Number of anticipated permitted dwellings on windfall sites	Dwellings complete by (cumulative):				
		Year 1	Year 2	Year 3	Year 4	Year 5
2013-14	600	30	126	288	384	444
2014-15	600		30	126	288	384
2015-16	600			30	126	288
2016-17	600				30	126
2017-18	600					30
Total						1,272

3.39 The total number of dwellings that can be expected to be completed on windfall sites across the East Riding over the next five years is 1,272.

⁴ There was an error in the reporting of windfall approvals in the 2015-16 SHLAA. In addition, due to the nature of the recording process the data can fluctuate year to year due to two stage applications and replacement proposals.

Non-Implementation Discount: Large Sites

- 3.40 Considering the non-implementation of planning permissions is an important factor when calculating housing supply. Whilst the 20 percent buffer ensures choice and competition in the market for the supply of land, non-implementation looks to make an additional discount regarding housing delivery on the ground.
- 3.41 The Council considers that assessing large sites with planning permission on a site by site basis is more appropriate than applying a blanket non-implementation rate to all large sites with permission. Assessing permissions on a site by site basis in this way continues to be supported by the working group. All large sites with permission where building works have not commenced have instead been individually assessed, paying particular attention to:
- whether the planning history shows numerous unimplemented permissions;
 - whether the site has a residential permission but also has implemented a permission for an alternative use; and
 - older permissions which are unlikely to be implemented.

Non-Implementation Discount: Small Sites

- 3.42 The number of small sites approved over the last five years and the year they were built has been considered. Historic completion rates indicate that 73 percent of small sites are implemented by year five. A non-implementation rate (27 percent) has therefore been applied to the supply of small sites to take into account sites which may not come forward.

4 Assessment Findings

Introduction

4.1 The different aspects of the methodology, as described and evidenced in the previous chapter, have been applied to the sites in the assessment. The fundamental purpose of the SHLAA is to identify land which is suitable, available and achievable for housing uses over the plan period.

4.2 This assessment is broken down into the five year (deliverable) supply, 6-15 year supply and potential supply. The presentation of the assessment findings are as follows:

Step 1: Identifying the five year (deliverable) supply

An assessment of the total number of plots with planning permission, broken into small and large sites, as well as the total number of plots from selected housing allocations within the Allocations Document and a windfall allowance.

Step 2: Projecting the five year (deliverable) supply in a trajectory

A projection of the five year supply across the plan period using the information from the detailed assessments of individual sites.

Step 3: Assessing the 6-15 and potential supply

An assessment of specific, deliverable/developable housing sites likely to be delivered in years 6-15 of the plan.

Step 4: Identifying any potential for broad locations

Clarification of whether broad locations for housing growth need to be identified.

Step 1 - Identifying the five year (deliverable) supply

Sites with planning permission

Large sites

4.3 A total of 6,143 dwellings can be delivered on large sites with a current planning permission over the next five years. As described in Chapter 3, the Council has considered the delivery of large sites on a site by site basis and those that are unlikely to be delivered in the next five years that have not been included in the SHLAA.

Small sites

4.4 The total number of plots on small sites with permission in the East Riding as of 1 April 2017 is 824. Applying a non-implementation discount to account for sites where

the permission may not be implemented reduces the supply to 602 over the next five years.

- 4.5 Therefore 6,745 dwellings from large and small sites with a current planning permission (including a non-implementation discount) are deliverable over the next five years.

Housing allocations within the Allocations Document

- 4.6 The 2017 SHLAA focuses on the individual deliverability of allocations and includes an up to date site by site assessment of their deliverability. A total of 4,483 dwellings are deliverable from East Riding Local Plan allocations (which do not currently benefit from planning permission) in the next five years. The Council is satisfied that the vast majority of the allocations in the Allocations Document are deliverable sites and can contribute to the supply of housing land for the next five year period.

- 4.7 The site by site assessment of deliverability has resulted in the following 20 allocations (or part thereof) being excluded from the five year (deliverable) supply, with a longer lead in time applied:

- ALD-A (Land North West and South of the telephone exchange Hornsea Road)
- ALD-B (Piggeries North Street)
- ALD-C (Land At Aldbrough Hall Hornsea Road)
- ALD-D (Land North of Queensmead)
- CHER-A (Land At Manor Farm Highgate)
- COT-D (Land West of Lawns Garth, Cottingham)
- DRF-E (Land North of Meadow Gates)
- DRF-F (Land South Side of Lockwood Street)
- DRF-L (Land North of Exchange Street and East of Middle Street North)
- DRF-M (Cattle Market, Beckside)
- GOO-F (Goole Depot, Dunhill Road, Goole)
- HES-H (Hessle Dock Livingston Road)
- HOR-C (Land Northwest of Parva Road, Hornsea)

- HOR-E (Land South of Sands Lane)
- CRA-E (Station Garage 48 & 50 Station Road)
- PAT-A (Highfields Farm On Ings Lane, Patrington)
- PAT-B (Land East of Guardians Road, Patrington)
- PAT-C (Land to the rear of 17-69 Northside, Patrington)
- WITH-B (Land to the West of Hollym Road, Withernsea)
- WITH-D (Land at the Car Park Station Road, Withernsea)

4.8 These Local Plan allocations are considered to be developable but are unlikely to be brought forward in the next five years for one/or more of the following reasons:

- the land owner/agent has indicated the site will not be available for development in the next five years (for example, because an existing use needs to be relocated prior to the commencement of development);
- the land owner/agent has indicated it is unlikely a planning application will be submitted on this site in the next five years; or
- the current evidence on viability suggests that a site is unlikely to be economically viable for development in the short term.

Windfall Allowance

4.9 A windfall allowance of 1,272 has been included in the five year supply.

The Five Year Supply

4.10 Table 13 shows the five year supply position. The total five year existing supply is 12,500 dwellings, compared to the five-year supply requirement of 11,575 (outlined in chapter 1).

Table 13 Five-year supply position

	Total
Planning permissions (large sites)	6,143
Planning permissions (small sites)	602
Local Plan Allocations	4,483
Windfall allowance	1,272
Total dwellings in the 5 year existing supply	12,500
Annual residual supply requirement (including 20% buffer)	2,315
Five-year net residual supply requirement (including 20% buffer)	11,575
Difference	925

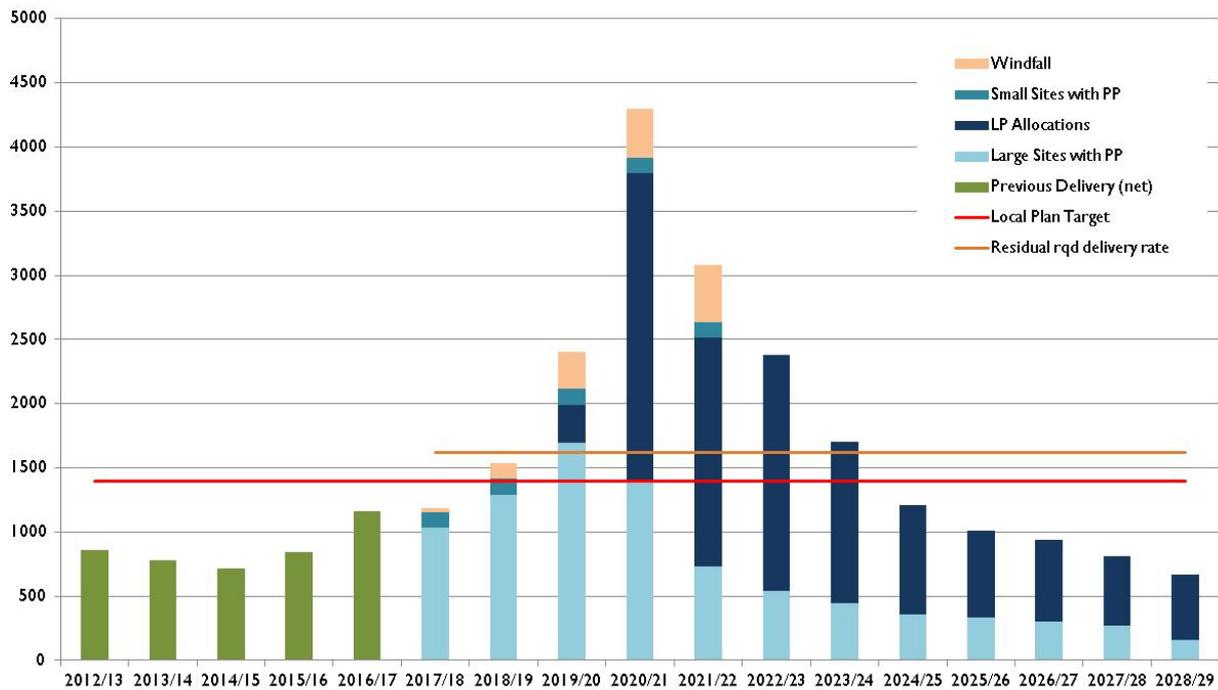
Please note - figures may not total due to rounding.

- 4.11 The Beverley & Central and Holderness & Southern Coastal sub areas have a total five year existing supply of 6,097. The Strategy Document (Policy S5) requires approximately 45 per cent of the total housing provision in the East Riding to be located in these sub areas, reflecting where the interactions between the City of Hull and those settlements in the East Riding are the strongest. The five year net residual housing requirement for the two sub areas is 5,078. Using these figures it can be calculated that this part of the East Riding has more than a five year supply of housing land.

Step 2 - Projecting the five year (deliverable) supply in a trajectory

- 4.12 The housing trajectory below (Figure 2) projects the supply to 2028-2029 applying the methodology. The windfall allowance is also included within the next five years of the plan period. It is important to note that the trajectory is based purely on allocated sites and sites with permission; it does not include assumptions about potential supply. Potential supply is considered further through step three.
- 4.13 The trajectory is based on build rates and pre-build lead-in times which are applied for all sites. In reality, sites will come forward in a less predictable way which is impossible to forecast with certainty, reflecting market conditions and the capacity of the development industry to deliver housing. The actual rate of delivery of housing will be determined by, amongst other things, the capacity of the market to deliver (e.g. skilled labour, finance and materials) and the demand for new homes in different locations across the East Riding. It is a rolling trajectory. New sites will be granted permission which will add to the supply as existing sites are built out.

Figure 2 East Riding Supply Trajectory



Step 3 – Assessing the 6-15 year and potential supply

Assessment of 6-15 year supply

4.14 Local planning authorities are required to assess the 6-15 year supply position. It should be noted that years 14 and 15 extend beyond the current Local Plan period (which runs to 2029).

4.15 The 6-15 year supply consists of:

1. Dwellings from sites in the Allocations Document which, after applying the assumed build rates and lead- in times, will not be completely built out in the initial five year period because they are large sites (6,156 dwellings).
2. Dwellings from sites with a current planning permission which, after applying the assumed build rates and lead- in times, will not be completely built out in the initial five year period because they are large sites (2,657 dwellings).
3. Dwellings from sites in the Allocations Document which have had their lead- in time increased beyond five years to reflect that the site is developable but not likely to come forward in the next five years (1,158 dwellings).

4.16 The total supply from these three sources is therefore 9,971.

4 Assessment Findings

Table 14 6-15 year supply position

	6-15 years
1. Local Plan Allocations (too large to be built out in five years)	6,156
2. Planning permissions (large sites, too big to be built out in five years)	2,657
3. Local Plan Allocations identified in the 6-15 year supply only (as a result of increased lead-in times)	1,158
Total	9,971

Assessment of Potential Supply

- 4.17 For clarity, the potential supply comprises of sites not identified in the Allocations Document and without planning permission. There are 615 such sites in the SHLAA with a total capacity of 73,628 dwellings.
- 4.18 A significant number of these sites are considered currently undevelopable because they are affected by national policy restrictions and/or are remote from the built form of a settlement in the settlement network. There may also be other constraints affecting the development of the site, such as the risk of flooding.

Step 4 - Broad Locations

- 4.19 As it has been shown that the East Riding has a supply of suitable, available and deliverable sites, it is not necessary to search for broad locations for development.

Housing Market Area Position

- 4.20 Planning Practice Guidance (PPG) (Paragraph 001, 3-007-2014306) states that the area selected for the housing land availability assessment should be the housing market area. It is therefore important to have regard to the housing land position in the Hull authority area. For completeness, the housing land supply position reported by Hull City Council at 1 April 2016 is reported in Table 16 below.

Table 15 Hull City Council five year land supply position

	Dwellings
Total dwellings in the five year existing supply (including windfall)	4,621
Five year net residual requirement (including 20% buffer)	3,720
Five year supply position	6.2

5 Summary and Conclusions

- 5.1 The SHLAA has identified over 900 sites in total. After non-implementation has been accounted for, 6,745 dwellings could be provided on sites that currently have permission (both large and small sites) in the next five years.
- 5.2 The number of dwellings that could be provided on allocations identified in the Allocations Document without a current planning permission in the next five years is 4,483.
- 5.3 A windfall allowance of 1,272 dwellings has also been included within the five year land supply.
- 5.4 The number of dwellings that can be accommodated on deliverable sites in the next five years (the deliverable supply) is 12,500, compared to a five-year requirement of 11,575 dwellings (+1,173 dwellings). A further 9,971 dwellings are available beyond the 5 year period.
- 5.5 The SHLAA has shown there is an abundance of sites that are, in theory, suitable, available and achievable over the plan period. Therefore, there is no need to identify any new broad locations of growth within the East Riding.

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 will continue to 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;

5 Summary and Conclusions

- whether the lead-in times and build rates are accurate and if they need updating;
- changing national policy context, including proposed amendments to the NPPF; and
- changes to the viability of sites.

Appendix A: SHLAA Wider Working Group Members

- Amec
- Home Builders Federation
- Barton Willmore
- Leonards Estate Agents
- Beal Homes
- Nathaniel Litchfield and Partners
- Bellway Homes
- North East Lincolnshire Council
- BNP Paribas Real Estate
- North Lincolnshire Council
- Doncaster Metropolitan Borough Council
- Ryedale District Council
- Doug Jennings Planning Consultant
- East Riding of Yorkshire Council Officers (representing development management, regeneration and valuation/estates)
- Scarborough Borough Council
- Selby District Council
- Shirethorn Ltd
- Spawforths
- Edwardson Associates
- Turley Associates
- Environment Agency
- PB Planning
- Gladman
- Pegasus Group
- Homegroup Housing Association
- Walker Morris
- ID Planning
- Wheldon Homes
- Globe Consultants Limited
- Highways Agency
- Homes and Communities Agency

Appendix B Feedback from Draft SHLAA Methodology Consultation

The HBF provided a written response to SHLAA Methodology Consultation. The main points raised are summarised below, along with the Council’s response to these issues.

HBF Comment	ERYC Response
General Comments	
The HBF agrees that assumptions on issues such as build-out rates, lead-in times and net developable area are useful. It is, however, recommended that the Council endeavours, where possible, to discuss these matters with the relevant land owners / agents / developers. These discussions should be used to inform the approach taken on particular sites.	Agreed. The Council consult on the SHLAA Methodology annually, and feedback from this is used to inform the approach taken to the SHLAA as a whole. Individual pro-formas are also sent to landowners/ agents/ developers to understand specific approaches on an individual site basis.
Housing completions	
Important that the Council seeks to increase the rates of housing delivery wherever possible.	Agreed. As acknowledged by the HBF, the adoption of the Local Plan is an important step in helping to deliver more homes. In addition, the Council are preparing a Housing Delivery Action Plan to identify a range of activities that the Council currently undertakes and others it could embark on to help bring sites forward faster. There is clear evidence of an increase in house-builder interest in this District following the adoption of the Local Plan
The Council will need to consider the implications of (the housing) delivery test and identify appropriate actions and trigger points. This may require considering additional sources of supply. The HBF and our members should be engaged in any actions the Council intends to take.	As noted above, the Council already seeking to develop an Action Plan and will respond to the specific provisions of the Delivery Test once finalised.
The 2016 SHLAA housing trajectory (figure 2) suggests a significant rise in housing delivery over the next 12 to 24 months. This is encouraging but will need to be closely monitored and remedial actions taken if the anticipated scale of delivery fails to materialise.	Noted. The trajectory sets out the deliverability of sites which will rely on the resources of the HBF’s members, and others, to bring forward. Housing delivery is monitored annually through the SHLAA and Annual Monitoring Report. The Housing Delivery Action Plan will set out actions to encourage delivery of housing.
The HBF also queries the lack of reference to completions in neighbouring Hull. This is important due to the fact that the two authorities’ share a joint housing market area and Hull are tasked with meeting a proportion of the housing needs from ERYC.	Reference is made to the Housing Market Area Position and Hull’s currently housing supply in the SHLAA itself. An additional table will be included in the 2017 SHLAA, setting out the housing completions reported by Hull City Council.

Appendix B Feedback from Draft SHLAA Methodology Consultation

Windfall site allowance	
Caution should be utilised when projecting forward this source of supply and considers the average approval figure of 700 to be too high.	Noted. The number of approvals is monitored on an annual basis with the evidence suggesting 600 approvals per annum is a conservative and appropriate number.
Ensure that no double-counting occurs in terms of windfall sites and the other sources of supply, particularly in the first three years.	Agreed. This is an important element to consider. The Council has monitoring mechanisms in place to avoid double counting.
Housing allocations within the Adopted Local Plan Allocations Document	
'Old allocations' left over from the former local plans should not be included without significant evidence indicating why they are now considered deliverable. This evidence should include information on why the situation has changed to such a degree that the site is now considered deliverable.	There are 26 sites in the East Riding Local Plan that were previously allocated for housing in the former local plans. 13 of them have been built, are under construction, have the benefit of planning permission or there is developer interest. The remaining allocations have been subject to the assessment tests set out in the NPPF and PPG. Sites cannot be simply ruled out on the principle of being older allocations, considering the number of these sites that have already come forward.
Non-implementation of sites: Assessment of allocations in the Local Plan	
For allocated sites to be included within the five year supply there should be an identified commitment from the landowner / developer to bring the site forward within five years. A lack of information should not be construed as the site being deemed available in the next five years.	ERYC endeavour to maintain up to date information on allocations, including the intention of landowners/developers to bring the site forward. Updates are regularly sought from landowners and developers. However, in debating the inclusion of a site, the PPG makes clear that there needs to be clear evidence that a site is not deliverable rather than clear evidence that a site will certainly (or more probably) be delivered.
Non-implementation of sites: Large sites with permission (not on East Riding Local Plan allocated sites)	
In addition to the criteria identified at paragraph 3.4 the Council should also take into account whether a developer is on board and, where possible, seek to discuss likely implementation dates with the landowner / agent / developer.	Noted. As part of the consultation process, the Council has contacted landowners/ agents/ developers to understand specific timescales where relevant.
Non-implementation of sites: Lapsed sites	
Lapsed sites should only be included in the five year supply where there is clear evidence the site will be brought forward.	Agreed. In assessing whether a lapsed site should be included we look at alternative permissions and consult Development Management on whether they are aware of progress with the site.
Non-implementation discount to small sites with permission	
The scale of such a discount should be discussed	Noted. The non-implementation discount to

Appendix B Feedback from Draft SHLAA Methodology Consultation

with the development industry.	small sites with permission is set out in the SHLAA and identified as an aspect for consideration through the SHLAA methodology paper. A number of small housebuilders are on the SHLAA working groups. The discount is worked out by assessing the implementation rates of small sites approved over the last five years.
Net developable area for sites without permission	
The ratios identified in table 2 appear quite high, particularly for larger sites. It is recommended that discussions are held with the development industry as well as land owners regarding larger sites above 5ha.	Noted. The average developable areas are based on evidence from completed and proposed developments. These are adjusted on a site by site basis where further evidence is available.
Further clarity in relation to the criteria identified in paragraph 3.8 would be useful to aid interpretation of what the Council is / is not excluding from the net developable area (i.e. what is meant by significant).	Noted. Where an application is submitted, the application normally sets out what the developer considers to be the net developable area. For allocations, the general assumptions are made but regard is also made to the specific policy requirements of the site allocation.
Pre-build lead-in times	
The lead-in times identified in table 3 are generally considered appropriate where site specific information is not available. The exception to this is for existing and emerging allocations without permission. As noted in paragraph 12 above these should only be included where the landowner / developer has shown a clear commitment to develop the site within five years.	The test for whether a site is deliverable is set out in Paragraph: 031 Reference ID: 3-031-20140306 of the PPG, and does not include whether or not a developer is on board. Where a developer provides information in respect of a timetable, this is used.
The Council should also consider the type and quantity of pre-commencement conditions placed upon the development. These can, and do, have a significant bearing upon implementation. The HBF recommends that pre-commencement conditions are discussed with the applicant and only used where absolutely necessary.	Noted. The Council has commenced a review of the use of conditions and the number of pre-commencement conditions.
Build rates	
Exercise caution in the presumption in table 10 that sites of 200 to 400 units will have two developers and above 400 units will have three developers. This should be confirmed prior to applying this assumption.	Noted. In 2015-16, the Council removed the assumption that a site of 400 or more units could have 4 developers as this was deemed to be unlikely. Of the 6 sites with an implemented permission that have over 200 units, just one has the assumed build rate. The rest are based on evidence from previous year's rates or anecdotal

	<p>evidence.</p> <p>The Council will continue to adjust the build rate on a case by case basis where additional evidence is available.</p>
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Feedback from SHLAA Core Working Group Meeting

A meeting of the SHLAA Core Working Group was held on 12 July 2017. The key points raised were:

SHLAA Core Working Group Comment	ERYC Response
The lead in times for small sites should be increased by 6 months	The lead in times for small sites has been increased by 6 months.
There are a number of specific sites that might be deliverable.	These sites have been re-assessed and officers have made further enquiries.

Appendix C: SHLAA Site Assessments and Maps

See

www.eastriding.gov.uk/environment/planning-and-building-control/current-strategic-plans/housing-monitoring/



East Riding of Yorkshire Council will, on request provide this document in braille or **large print**.

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