



East Riding of Yorkshire Council

Strategic Housing Land Availability Assessment

Position at 1 April 2015



EAST RIDING
OF YORKSHIRE COUNCIL

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A Executive Summary

- A.1** 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*.
- A.2** The *East Riding Local Plan Strategy Document* (adopted April 2016) 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.**
- A.3** 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.
- A.4** 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 (the availability and achievability).
- A.5** The 2015 SHLAA takes into account housing completions and other information (including planning permissions and lapsed housing sites) to calculate the five year housing land supply position at 1 April 2015. 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 input into 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.
- A.6** In reviewing the level of net housing completions since the start of the plan period in 2012 (2,353) against the Local Plan housing requirement over the same period (4,200), a shortfall of 1,847 dwellings has been identified. This shortfall is added to the next five year period, resulting in an annual residual housing requirement of 2,125 dwellings and a five year requirement total of 10,625. 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.

- A.7** The assessment finds that there is a **6.2 year supply of deliverable housing sites in the East Riding as a whole**. This principally comprises:
- large and small sites with planning permission (5,219 dwellings);
 - selected housing allocations within the *East Riding Local Plan Submission Allocations Document* (January 2014) and accompanying Schedule of Modifications (March 2015) (7,060 dwellings); and
 - a windfall site allowance (848 dwellings).
- A.8** Given the Council's continued commitment to affording the *East Riding Local Plan Submission Allocations Document* (January 2014) appropriate weight in the determination of planning applications it is apparent that, applying the assumed build rates and lead-in times to sites identified as allocations in the *Allocations Document*, a significant number of dwellings from emerging allocations can be considered deliverable in the five year supply period. This means a large supply of deliverable land for housing is available in the East Riding.
- A.9** The report clarifies that there is a sufficient supply of potentially developable sites to meet provision over the next fifteen years. Therefore, the assessment finds that there is no need to outline any broad growth areas.
- A.10** 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.

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* (adopted April 2016) 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 preparation of the *Allocations Document* has involved a rigorous sustainability assessment of individual sites against an adopted Site Assessment Methodology (January 2014) as well as full consultation with the wider community. The 2015 SHLAA takes into consideration the sites set out in the *Submission Allocations Document* (January 2014) and accompanying Schedule of Modifications (March 2015).
- 1.4** The SHLAA helps support the broad selection of locations for new housing in the *East Riding Local Plan* in that it helps identify, in land terms, the basic availability of sites to accommodate housing growth. The 2015 SHLAA provides the housing land supply position at 1 April 2015. **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.**

Context

- 1.5** 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⁾

- 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 Boothferry Borough Local Plan (April 1999).
- Bridlington Town Centre Area Action Plan (AAP) (Adopted January 2013).
- *East Riding Local Plan Strategy Document* (adopted April 2016).

The emerging Allocations Document

- *East Riding Local Plan Submission Allocations Document* (January 2014) and accompanying Schedule of Modifications (March 2015).

Other evidence and considerations

- Housing Market Area Position.
- Recent completions.
- Development Viability.

National Policy

The National Planning Policy Framework

1.6 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.

1.7 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 The supply position in this report is of 1 April 2015 although consideration has been made to the latest position with the Development Plan to aid clarity.

- 1.8** In addition to identifying sufficient specific deliverable sites for the next five years of the plan period, 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.
- 1.9** 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).
 - 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).
- 1.10** 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. The 2014 SHLAA identified a 7.6 year supply of deliverable housing sites in the East Riding at 1 April 2014.

Planning Practice Guidance

- 1.11** On 6 March 2014 the Department for Communities and Local Government (DCLG) published the planning practice guidance accompanying the NPPF. The PPG provides clarity on what might constitute a 'deliverable' site.

The Development Plan

Existing Local Plans

- 1.12** The four existing Local Plans (East Yorkshire Borough Wide Local Plan, Beverley Borough Local Plan, Holderness District Wide Local Plan and Boothferry Borough Local Plan) contain a number of undeveloped housing allocations without a current planning permission. The policies for the development of those sites have been saved and continue to be used until the adoption of the *Allocations Document*.

Bridlington Town Centre Area Action Plan

- 1.13** The Bridlington Town Centre Area Action Plan (AAP) was adopted in February 2013. It provides for housing in the Town Centre of Bridlington. The housing requirement identified in the AAP is included within the SHLAA.

Local Plan Strategy Document (April 2016)

- 1.14** The *Strategy Document* was adopted in April 2016. This 2015 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 4). 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.

The emerging Allocations Document

Submission Allocations Document (January 2014) and accompanying Schedule of Modifications (March 2015).

- 1.15** The Council submitted the *Allocations Document* for an Examination In Public on 29 April 2014. Public hearing sessions were held in November 2014 and July 2015. The Council expects to adopt the *Allocations Document* in Summer 2016.
- 1.16** The *Submission Allocations Document* contains policies that guide the development of specific sites. It has been prepared following extensive consultation with residents, Town and Parish Councils, the development industry, other organisations and statutory bodies. Previous plan preparation stages include:
- *Potential Sites* (May 2010) - marked the first stage in the process. Presented all sites that were being considered through the preparation of the *Allocations Document*.
 - *Draft Allocations Document* (January 2013) - set out the preferred site allocations proposed for development, as well as other sites that had been rejected.
 - *Proposed Major Changes* (August 2013) - set out a number of changes to the preferred site allocations.
 - *Proposed Submission Allocations Document* (January 2014) - set out the allocations proposed for development (to be considered by an independent planning inspector).
- 1.17** The preparation of the *Allocations Document* has involved an extensive site assessment process. Landowners and developers have submitted 'land bids' for the Council to consider as part of the preparation of the document. All land bids have been considered and assessed against an adopted Site Assessment Methodology (2014) providing a consistent basis for comparing the different options to enable the most suitable sites to be selected for future development.

- 1.18** In addition to the above stages of consultation, a 'fact-checking' exercise was conducted with those who had submitted land for consideration within or closely related to settlements in the identified settlement network. Questions over deliverability were asked of those who put the site forward allowing for constraints that impact on suitability, availability and achievability to be identified in the SHLAA preparation process.
- 1.19** The Council regularly contacts planning agents, land owners and developers to obtain the very latest position regarding the delivery of the allocations in the *Submission Allocations Document*. This has enabled the Council to respond to the very latest industry information regarding the deliverability of draft allocations and ensure the latest information is reflected in the SHLAA.
- 1.20** The assessment and consultation processes have allowed the Council to identify deliverable and developable sites within the *Submission Allocations Document*. Any outcomes through this assessment process have also informed the SHLAA process.
- 1.21** In line with paragraph 216 of the NPPF, the Council continues to take a pragmatic and positive approach to the determination of planning applications for residential development and has been affording appropriate weight in the decision making process to proposed housing allocations in the *Allocations Document*. Where developers are promoting sites in advance of the adoption of the *Allocations Document*, the Council has been taking a supportive approach where sites are identified as preferred allocations.

Other Evidence and Considerations

Housing Market Area Position

- 1.22** Planning Practice Guidance (PPG) (Paragraph 001, 3-007-2014306) states the area selected for the housing land availability assessment should be the 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 has been presented (see chapter 4). Hull City Council are a key stakeholder in the preparation of the SHLAA.

Recent Completions

- 1.23** Table I shows the annual housing completions in the East Riding for 2014-15. The gross figure indicates the total number of dwellings completed in 2014-15. The net completions figure reflects the losses from dwelling conversions, change of use and demolitions.
- 1.24** 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.

1.25 In the period 2014-15, 349 of the 713 (net) completions in the East Riding (49 percent) were located in the Beverley & Central and Holderness & Southern Coastal sub areas. The SHLAA will review 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 1 - Housing completions 2014-15

Local Plan Sub Area	Gross	Net
Beverley & Central	298	269
Bridlington Coastal	166	121
Driffield & Wolds	49	41
Goole & Humberhead Levels	105	84
Holderness & Southern Coastal	93	80
Vale of York	133	118
Total	844	713

Development Viability

1.26 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".

1.27 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.

1.28 The 2015 SHLAA applies the viability analysis from the Community Infrastructure Levy (CIL) Viability Study (January 2016). This study tests 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 any 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

- 1.29** In 2014-15, the net housing completions figure for the East Riding was 713 dwellings. The Beverley & Central sub area had the highest level of completions in the East Riding reflecting the continuing strength of this housing market area. This was followed by the Bridlington Coastal and Vale of York sub areas. The Goole and Humberhead, Holderness and Southern Coastal and Driffield & Wolds sub areas had the lowest level of housing completions in 2014-15.
- 1.30** Paragraph 47 of the NPPF requires local planning authorities 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.
- 1.31** Within the East Riding, the housing requirement has not been met since 2008-09 (coinciding with the economic downturn). However, in the period since the Council formed (1996) to 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 2015 SHLAA continues to provide a 20 percent buffer in recognition of aim of the NPPF to increase housing delivery.
- 1.32** Table 2 (overleaf) 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 plan period), including a 20 percent buffer.

Table 2 - Housing completions and residual housing requirement

		Total
A	Net completions (2012 - 2014/15)	2,353
B	Emerging Local Plan housing requirement (per annum)	1,400
C	Emerging Local Plan requirement (2012- 2014/15)	4,200
D	Shortfall (C-A)	1,847
E	Shortfall (D) / 5 years	370
F	Annual residual requirement (including 20% buffer) (B+E+20%)	2,125
G	5 year residual requirement (including 20% buffer) (F*5)	10,625

- 1.33** Reviewing the level of net housing completions since the start of the plan period against the three year emerging Local Plan housing requirement means that a shortfall of 1,847 dwellings can be identified (4,200 minus 2,353 net completions). In order to boost housing delivery, the 20 percent buffer has been added to the 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 2).

1.34 This 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.

1.35 Front loading the shortfall and applying a 20 percent buffer results in annual residual housing requirement of 2,125 dwellings, or a five year requirement of 10,625 dwellings. **This figure is used to determine the five year housing land supply position in the East Riding.**

Brownfield Completions

1.36 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 2014-15 nearly half of the gross completions were located on brownfield land, against a *Local Plan* target of 20 percent.

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
Total	1,324	2,746	48

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. 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.
- 2.4** The 2015 core working group consisted 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.
 - A planning officer from the Development Management section of East Riding of Yorkshire Council.
- 2.5** The second working group is the wider working group. Both working groups had an opportunity to comment on the proposed SHLAA methodology.
- 2.6** Notable members of the wider working group included:
- The Environment Agency.
 - The Home Builders Federation.
 - The Highways Agency.
 - A range of other house builders and agents.

- 2.7** 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.
- 2.8** 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*. 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.
- 2.9** Appendix A provides a full list of the 2015 working group members.

Consultation

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

Developing the Methodology

- 2.11** The Council met with the core working group to discuss the methodology used for assessing sites and to present figures and evidence. The following elements of the methodology were discussed at this meeting:
- 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
 - pre-build lead-in times
 - build rates.

- 2.12** At this meeting the core working group noted that existing allocations not identified in the *Submission Allocations Document* (January 2014) and accompanying Schedule of Modifications (March 2015) would not be included in the five year deliverable supply unless there was a planning permission or other evidence confirming the deliverability of the site. The group had no objections to the principle of including deliverable emerging Local Plan allocations in the five year supply.
- 2.13** The Council's intention to assess large sites with permission on a site by site basis, rather than apply a blanket non-implementation discount across all sites, was discussed and supported. The group was also made aware of the Council's intention to examine the continued deliverability of lapsed sites. The meeting was used as an opportunity to clarify what was meant by the pre-build lead in time and to review the density, developable area and build rate assumptions. The group was reminded that these assumptions are always treated as a starting point and could be tailored on a site by site basis to reflect specific circumstances and up to date reliable information provided to the Council.
- 2.14** Following the meeting, a 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 position. All responses to the consultation were considered and taken into account during the production of the final SHLAA report.
- 2.15** 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** 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** 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** In drawing up the methodology, the Council has also had regard to guidance published by bodies such as the Planning Advisory Service (PAS), as well as considering the outcomes from planning appeals and High Court judgements across the country. Working in partnership with the development industry to develop the methodology is crucial to understanding the relevance and accuracy of the assumptions set out in this chapter.

Assessed Settlements

- 3.4** 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 4 (overleaf). 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 I The East Riding Settlement Network

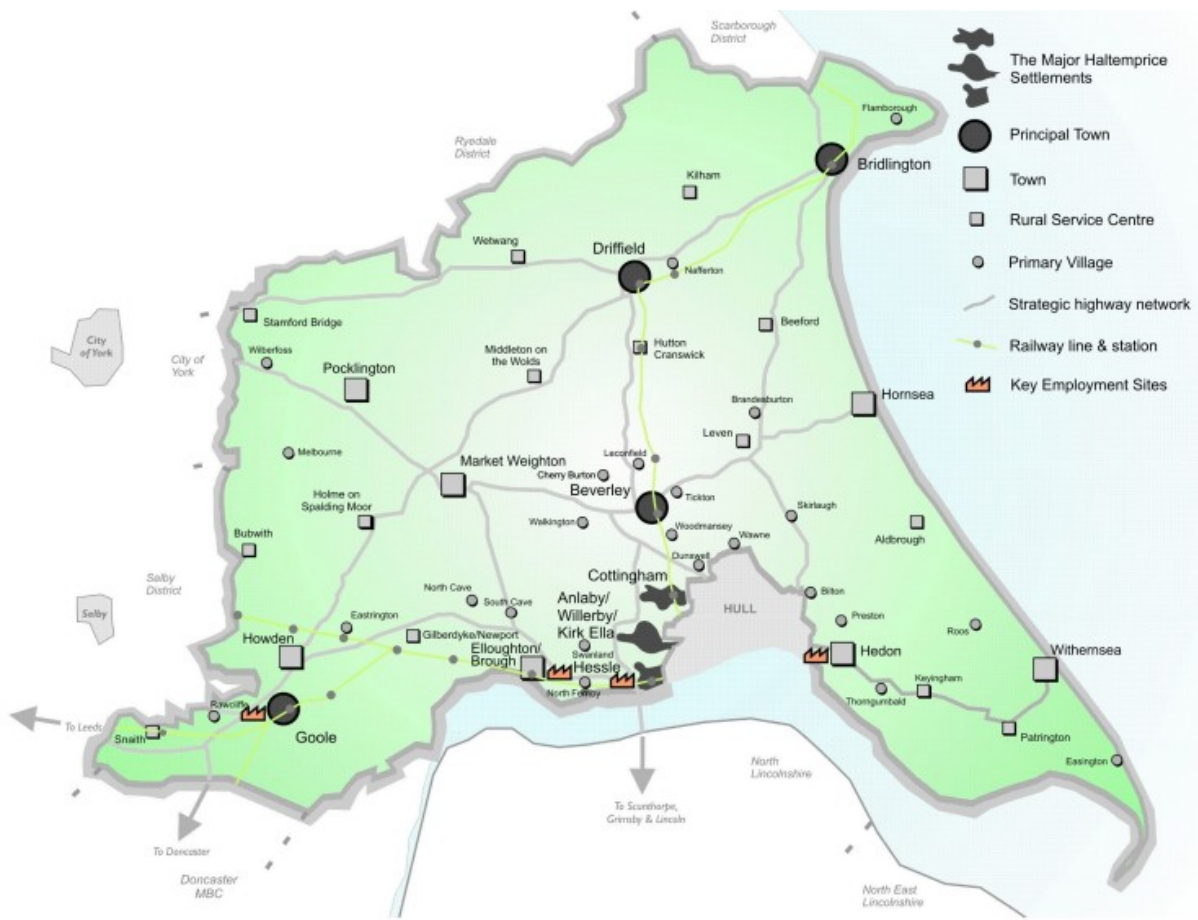


Table 4 - East Riding Settlement Network

Major Haltemprice Settlements		
Anlaby ⁽²⁾	Cottingham	Hessle
Kirk Ella	Willerby	
Principal Towns		
Beverley	Bridlington	Driffield
Goole		
Towns		
Elloughton cum Brough	Hedon*	Hornsea
Howden	Market Weighton	Pocklington
Withernsea		
Rural Service Centres		
Aldbrough	Beeford	Bubwith
Gilberdyke/Newport*	Holme on Spalding Moor	Hutton Cranswick
Keyingham	Kilham	Leven
Middleton on the Wolds	Patrington	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

* No specific allocations for residential development will be made based on current evidence regarding the level of flood risk/health and safety risk in these settlements.

2 Including Anlaby Common

Populating the SHLAA

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

The five year supply

- 3.6** 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 they meet the definition of a 'deliverable' site as set out in the NPPF and PPG:

- Large and small sites with planning permission; and
- Selected housing allocations within the *Submission Allocations Document* (January 2014) and accompanying Schedule of Modifications (March 2015).

- 3.7** A windfall site allowance is also included within the deliverable supply. This is based on historic data. These sources of supply are covered in more detail in the paragraphs that follow.

Sites with Planning Permission

Large sites with planning permission

- Specific sites with five or more dwellings with either outline or full permission which remain undeveloped at 1 April 2015 (though they may have commenced but not completed building work).

Small sites with planning permission

- Specific sites with fewer than five dwellings with either outline or full permission which remain undeveloped at 1 April 2015 (though they may have commenced but not completed building work). 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 B).

Sites deferred for delegated officer approval

- Planning applications which, at 1 April 2015, 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 principal of including sites deferred for delegated for officer approval in the five year supply.

Lapsed sites

- Policy AD1 of the *Submission Allocations Document* (January 2014) 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 2015) 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 be considered deliverable.

Selected Housing allocations within the Submission Allocations Document

3.8 The 2015 SHLAA continues to include the vast majority of allocations identified in the *Submission Allocations Document* (January 2014) and accompanying Schedule of Modifications (March 2015) as part of the five year supply. It is considered appropriate to consider these sites within the five year supply because;

a) the *Allocations Document* has reached an advanced stage, has been subject to numerous rounds of consultations and the allocated sites have been subject to rigorous assessment and 'fact checking' with the landowners or their agents;

b) the Council has strong evidence to support the deliverability of these sites; and

c) the Council is committed to affording emerging allocations appropriate weight in the determination of planning applications in order to boost significantly the supply of housing. This is evidenced by the substantial number of planning applications which have been approved on emerging allocations. In summary, the current position in relation to the planning status on the allocations in the *Submission Allocations Document* (at 9 May 2016) is as follows:

- 94 planning applications for residential development have been approved on proposed housing/mixed use allocations totalling 6,749 dwellings.
- 13 planning applications for residential development on proposed housing allocations have been deferred at Planning Committee with delegated powers to approve. These total 1,154 dwellings.
- 17 further planning applications are currently in the process of being determined on proposed housing allocations. These applications total 2,789 dwellings and have been supported, in principle, by the Forward Planning team.
- 28 further schemes on proposed allocations have been subject to pre-application consultation or screening.

3.9 **The above statistics reflect the position at 9 May 2016 and have been provided for information only. For clarity, the 2015 SHLAA reports the position at 1 April 2015.**

3.10 The approach of using emerging allocations is consistent with the PPG (Paragraph 19, 3-019-20140306) which states: "assessing the suitability of sites or broad locations for development should be guided by: the development plan, emerging policy and national policy." In relation to deliverable sites, the PPG (Paragraph 31, 3-031-20140306) confirms that planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five year supply. It states:

"However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five year supply. Local Planning Authorities will need to provide robust evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. If there are no significant constraints (eg. Infrastructure) to overcome... sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five year timeframe."

3.11 Guidance in the PPG, footnote 11 of the NPPF, and the stance taken by the High Court judge in the case of *Wainhomes*⁽³⁾, all indicate that proposed allocations can be considered for inclusion in the five year supply, subject to consideration of the evidence that they are deliverable. The Planning Inspector's Report on the *Local Plan Strategy Document* and several recent planning appeals in the East Riding have concluded the inclusion of deliverable emerging Local Plan allocations in the five year supply is appropriate.

3.12 Given the Council's continued commitment to affording the emerging allocations appropriate weight in the determination of planning applications, it is apparent that, applying the assumed build rates and lead-in times to sites identified as allocations in the *Submission Allocations Document* (January 2014) and accompanying Schedule of Modifications (March 2015), a significant number of dwellings can be considered deliverable in the five year supply. This means a much greater supply of deliverable land for housing is available in the East Riding.

3.13 The results of the CIL Viability Study (January 2016) 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.

3 CO/12207/2012 *Wainhomes (South West) Holdings Limited v Secretary of State for Communities and Local Government*

A Windfall Site Allowance

3.14 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 lower than has previously been the case) in that it has regard to the expected decrease in the the number of windfall approvals when the full *East Riding Local Plan* is adopted and competition from allocated sites increases.

The 6-15 year supply

3.15 The 6-15 year supply consists of;

1. Dwellings from sites identified as allocations in the *Submission Allocations Document* (January 2014) and accompanying Schedule of Modifications (March 2015) 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. 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.
3. Dwellings from sites identified as allocations in the *Submission Allocations Document* (January 2014) and accompanying Schedule of Modifications (March 2015) 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. A small number of emerging allocations fall into this category. The site specific adjustment of the lead-in time will result in these sites being identified in the 6-15 year supply.

Potential supply

3.16 The potential supply is made up of 'land bids' and sites allocated in the existing Local Plans⁽⁴⁾ which do not benefit from planning permission and are not being taken forward as an allocation in the *Allocation Document*.

3.17 Land bids are 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.

3.18 The four existing Local Plans contain a number of undeveloped housing allocations without a current planning permission. The policies for the development of those sites have been saved and continue to be used until the adoption of the *Allocations Document*.

4 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 Boothferry Borough Local Plan (April 1999)

The vast majority of the existing allocations are considered acceptable in principle and remain part of the development plan. However, these sites have a five year lead-in time to reflect that they are part of the potential supply only.

3.19 For clarity, the potential supply comprises of;

1. Sites not identified as allocations in the *Submission Allocations Document* (January 2014) and accompanying Schedule of Modifications (March 2015) and without planning permission. The majority of these sites have been submitted by landowners/developers as 'land bids'.
2. Sites identified as existing Local Plan allocations which do not benefit from planning permission.

3.20 The assessment considers some of the potential supply to be developable, as no insurmountable constraints (including viability) have been identified. The sites identified in the developable potential supply are those rejected through the *East Riding Local Plan* assessment process because other sites were considered more suitable through a more detailed sustainability assessment.

3.21 Sites that are undevelopable 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 constraint(s) affecting the development of the site (for example Flood Zone 3).

The Assessment

3.22 Appendix B sets out the results of the individual site assessments. The SHLAA was populated with the following 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 4).
Settlement Name	Location of site.
Allocations Ref	Should the site have been identified through the emerging <i>Local Plan</i> process, this is the reference for the site.
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 <i>Allocations Document</i> (DA) (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	An indication as to whether the site has planning permission.
Existing Allocation	An indication as to whether the site is an existing <i>Local Plan</i> allocation.
Draft Allocation	An indication as to whether the site is allocated in the emerging Local Plan.
Draft Allocation extent of site	Should the site be a draft allocation, this column indicates whether the site forms part or all of the draft allocation site boundary.
Potential Site	An indication as to whether the site is a 'potential site'.
Lapsed Site	Site has a lapsed planning permission at 1 April 2015 and the ongoing deliverability of the site has been assessed on a case by case basis.
Deferred Site	Sites which, at 1 April 2015, were deferred for delegated officer approval and included in the five year supply on that basis.
Delayed Site	Site with an increased lead-in time.
In 5 year supply?	An indication as to whether the site is included in the 5 year supply.
Date of permission	The date the notice of decision was issued, should the site have planning permission.
Permission started?	An indication as to whether works have commenced on-site, should the site have planning permission.
Permission Expiry Date	The date the permission will expire (lapse), should the site have planning permission.
Reason Considered	Information showing what source the site came from, e.g. a land bid, housing allocation, etc.
Area (ha)	Gross area of the site measured in hectares (ha).
Developable area ratio	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 draft allocations which have had their assumptions adjusted to account for special on-site circumstances.</i>
Developable area (ha)	The area of the site in hectares (ha) considered developable.
Density	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>

Net capacity	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.
Capacity remaining	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.
% PDL	The area of the site considered to be previously developed land (PDL)(%).
GF/BF	A indication as to whether the site is greenfield land (GF), brownfield land (BF), or a mixture of both.
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	<p>Relevant national policy designations</p> <p><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></p>
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 with only the basic critical data 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 assessments can be viewed on the Council's website.
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 value 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 currently developable?	Considers whether the site is developable in 6-15 years.
Site additional delivery comments (position at 6 May 2016)	Any additional information with regards to the deliverability of the site. <i>Should the site be identified as a draft allocation in the emerging 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 2015-16	The number of dwellings expected to be built in 2015-16.
Build rates 2016+	The number of dwellings expected to be built in 2016/17 and every year until 2029/30.
2015-2016	The number of dwellings expected to be built in this year.
2016-2017	The number of dwellings expected to be built in this year
2017-2018	The number of dwellings expected to be built in this year.
2018-2019	The number of dwellings expected to be built in this year.
2019-2020	The number of dwellings expected to be built in this year.
2020-2021	The number of dwellings expected to be built in this year.
2021-2022	The number of dwellings expected to be built in this year.
2022-2023	The number of dwellings expected to be built in this year.
2023-2024	The number of dwellings expected to be built in this year.
2024-2025	The number of dwellings expected to be built in this year
2025-2026	The number of dwellings expected to be built in this year..
2026-2027	The number of dwellings expected to be built in this year.
2027-2028	The number of dwellings expected to be built in this year.
2028-2029	The number of dwellings expected to be built in this year.
2029-2030	The number of dwellings expected to be built in this 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

- 3.23** The PPG (Paragraph 17, 3-017-20140306) looks to emerging 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.
- 3.24** 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 be looking 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.
- 3.25** The density assumptions are only applied to sites without permission. A significant number of draft allocations already have information agreed with regards to density (in the form of committed numbers of dwellings) through a planning application and resolution. Members of the working group were invited to submit their own information on site specific schemes for consideration.

Calculating Developable areas

- 3.26** 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.
- 3.27** 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 a important landscape or wildlife site; and
- areas comprising non housing development, such as employment, commercial uses or community facilities (such as new school or health centre).

3.28 The 2015 SHLAA continues to apply assumptions to sites without planning permission (see Table 5). On-site features affecting the developable area of emerging *Local Plan* allocations have been accounted for in developing the indicative capacity figures set out in the *Submission Allocations Document* (January 2014) and accompanying Schedule of Modifications (March 2015).

Table 5 - 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

- 3.29** 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. The assumed pre-build lead-in times applied to the five year supply sites in the 2015 SHLAA are shown in Table 6 (overleaf).
- 3.30** The working group noted the updated evidence in relation to the confirmed lead-in times of recently completed developments presented by the Council and the rates applied by neighbouring local authorities. The evidence was derived from the Council's housing monitoring system using data considered historically reliable.
- 3.31** Further analysis of historic lead-in times suggested previous SHLAA assumptions may not necessarily reflect the confirmed lead-in times of recently completed developments, particularly those sites with outline planning permission. To respond to recent evidence and feedback from the working group, the Council has increased the lead-in times by six months for all categories in the 2015 SHLAA (shown in table 6 overleaf).

Table 6 - 5 year supply pre-build lead-in times

	Fewer than 50 plots	More than 50 plots
Emerging/existing allocations without planning permission	30 months	36 months
Outline planning permission	24 months	30 months
Reserved matters/full planning permission	12 months	18 months

- 3.32** The above assumptions 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 or there are site specific considerations to take into account.
- 3.33** There are a small number of emerging 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.
- 3.34** 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.

Pre-build lead-in times: Potential Supply Sites

- 3.35** The assessment considers some of the potential supply sites to be currently developable. The developable potential supply sites are those rejected through the *Allocations Document* assessment process because other sites were considered more suitable through a detailed sustainability assessment. Developable potential sites have a five year (60 month) lead-in time applied to them meaning they fall within the 6-15 year period of the assessment. This does not mean the Council will grant planning permission on those sites after five years. They may be contrary to the development plan.
- 3.36** Potential sites are considered undevelopable if they are unviable, 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 constraint(s) affecting the development of the site. These sites are assessed in the SHLAA for completeness but have no lead-in time applied to them, meaning they fall outside the 15 year assessment period.

Build rates for large sites

- 3.37** The build rate 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 availability of finance; the number of developers on a site; and their capacity to build out the site.

3.38 The working group noted the updated evidence of confirmed build rates. The evidence was derived from the Council's housing monitoring system using data considered historically reliable. The Council also reviewed the information provided through dialogue with planning agents, land owners and developers and other publicly available local authority assumptions to understand what build rates would be appropriate.

3.39 The evidence suggests the previous build rate assumptions continue to be appropriate in the 2015 SHLAA. Feedback from the working group suggested the application of an 'interim' rate in year one and a 'normal' rate thereafter remains appropriate. The assumed rates, shown in table 7 (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;
- following planning permission, the Council is aware of how many developers are developing a site, enabling the build rate to be adjusted accordingly.

Table 7 - Annual build rates

Size of site	2014-15 (interim rate)	2015-16 onwards (normal rate)
Fewer than 10 units	6	8
Fewer than 50 units	20	25
Fewer than 200 units	30	35
Fewer than 400 units (assuming 2 developers)	55	60
400 or more units (assuming 3 developers)	80	90
400 or more units (assuming 4 developers)	107	140

Calculating a windfall allowance

3.40 A windfall site is a site not specifically allocated for development but which unexpectedly becomes available for development. Table 8 (below) shows that over the last five years, windfall completions have consistently formed over half of the gross completions in the East Riding. Emerging Local Plan allocations are not included in the windfall completed figures reported overleaf.

Table 8 - 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
Total	2,001	2,746	73

- 3.41** Table 8 shows that of the 2,746 gross completions in the last 3 years, 2,001 (or 73 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. ⁽⁵⁾
- 3.42** Historic completion rates indicate that, on average 74 percent of the windfall sites with permission were completed by year five of their planning permission. The historic completions rates of implementation have been 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).
- 3.43** In response to feedback from the working group, the average number of windfall permissions anticipated to come forward in each year of the five year period has been significantly reduced to account for the likely decrease in the number of windfall approvals as competition from allocated sites increases on adoption of the *Allocations Document*. The number of permitted dwellings on windfall sites expected to come forward in each year of the five year period is 400 per annum. This figure is significantly lower than the number of dwellings granted permission on windfall sites in 2014-15 (829 dwellings). This confirms a 400 dwelling per annum assumption in the calculation of the windfall allowance continues to be appropriate. The calculation of the windfall allowance is shown overleaf.

⁵ Sites identified as allocations in the *Submission Allocations Document* (January 2014) and Schedule of Modifications which obtain planning permission before the adoption of the *Allocations Document* are technically 'windfall' sites however no additional allowance has been made for these sites in windfall calculations.

Table 9 - 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	400	20	84	192	256	296
2014-15	400		20	84	192	256
2015-16	400			20	84	192
2016-17	400				20	84
2017-18	400					20
Total						848

3.44 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 848.

3.45 With regards to expected future trends, windfall sites are expected to provide a reliable source of supply. This is because the windfall projection is based on historic data which included a period of strong development management in villages, for example, individual plots were conditioned for 'local needs' between 28 April 2009 and 22 May 2012. Policy S4 of the *Strategy Document* is much more supportive of infill development in villages and development limits have been revised to allow for infill opportunities to come forward. The annual nature of the SHLAA ensures that windfall assumptions respond to the latest evidence and potential future changes to national planning policy, for example, increasing the potential to develop small sites adjacent to existing settlements.

Non-Implementation Discount: Large Sites

3.46 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.

3.47 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. This year, 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.

3.48 Assessing permissions on a site by site basis in this way continues to be supported by the working group and resulted in the following sites (totalling 233 dwellings) shown in Table 10 being excluded from the five year supply. In some cases it was considered appropriate to include sites within the potential supply.

Table 10 - Large sites with permission unlikely to be implemented for residential purposes

Site reference	Location	Nmbr of dwellings	Reason for non-implementation
I410a	Land West of Ryecroft Drive, Withernsea	118	Very old permission unlikely to come forward within five years
I0/03650/PLF	Miriam House The Hourne Hessle	5	Permission for an alternative use
I1/05722/PLF	253 Queen Street, Withernsea	6	Permission for an alternative use
I2/01964/PLF	Gorton Lodge Development, 49 Gorton Road, Willerby	5	Permission for an alternative use
I2/03843/STOUT	Golden Imp Chalet Park, Cliff Road, Hornsea	25	Permission unlikely to be implemented. No evidence of reserved matters application.
I2/04525/OUT	Grange Auto And Leisure Services, 21 Main Street, Willerby	6	Permission for an alternative use
I2/04725/STOUT	Land South of Balk Lane, Hook	30	Permission unlikely to be implemented. No evidence of reserved matters application.
I2/04869/PLF	Keldspring Lane, Barmby Moor	5	Numerous unimplemented permissions on site.
I3/00116/OUT	St Martins Drive, Burton Agnes	10	Permission unlikely to be implemented. No evidence of reserved matters application.
I3/02003/OUT	Bridlington Promenade Bazaar, 34 Promenade, Bridlington	9	Permission unlikely to be implemented. No evidence of reserved matters application.
I4/02430/OUT	35 Eastgate North, Driffield	14	Permission unlikely to be implemented. No evidence of reserved matters application.
Total		233	

Non-Implementation Discount: *Small Sites*

- 3.49** 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 67 percent of small sites are implemented by year five. A non-implementation rate (33 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 *Submission Allocations Document* (January 2014) and accompanying Schedule of Modifications 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. Includes an assessment of potential supply.

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 4,832 dwellings can be delivered on large sites with a current planning permission over the next five years.

Small sites

- 4.4** The total number of plots on small sites with permission in the East Riding as of 1 April 2015 is 684. Applying a non-implementation discount to account for sites where the permission may not be implemented reduces the supply to 459 over the next five years.

- 4.5** Therefore 5,291 dwellings from large and small sites with a current planning permission (including a non-implementation discount) can be delivered over the next five years.

Housing allocations within the Submission Allocations Document

- 4.6** The 2015 SHLAA focuses on the individual deliverability of emerging allocations and includes an up to date site by site assessment of their deliverability. The analysis set out in the Council's CIL Viability Assessment has been applied to sites in the SHLAA to test how much of the supply would be viable and therefore likely to be achievable.

- 4.7** 7,029 dwellings could be provided on emerging *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 *Submission Allocations Document* (January 2014) and accompanying Schedule of Modifications (March 2015) are deliverable sites and can contribute to the supply of housing land for the next five year period. This is evidenced by the fact that proposals have already been submitted on emerging allocations since the publication of the *Draft Allocations Document* (January 2013) and that they are being supported by the Council.

- 4.8** The site by site assessment of deliverability has resulted in the following 12 emerging allocations (or part thereof) being excluded from the five year (deliverable) supply, with a longer lead in time applied:

- BEV-C (Longcroft Lower School, Church Road, Beverley)
- COT-D (Land West of Lawns Garth, Cottingham)
- DRF-G (Former Sugar Mill, Anderson Street, Driffield)
- 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)
- HOR-C (Land Northwest of Parva Road, Hornsea)
- 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)

4.9 These emerging 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.

Windfall Allowance

4.10 A windfall allowance of 848 has been included in the five year supply.

The Five Year Supply

4.11 Table 12 (overleaf) shows the five year supply position. The total five year existing supply is 13,199 dwellings. **Comparing this figure to the five year requirement of 10,625 (outlined in chapter 1) means that the East Riding as a whole has a 6.2 year supply of deliverable housing sites.**

Table 11 - 5 year supply position

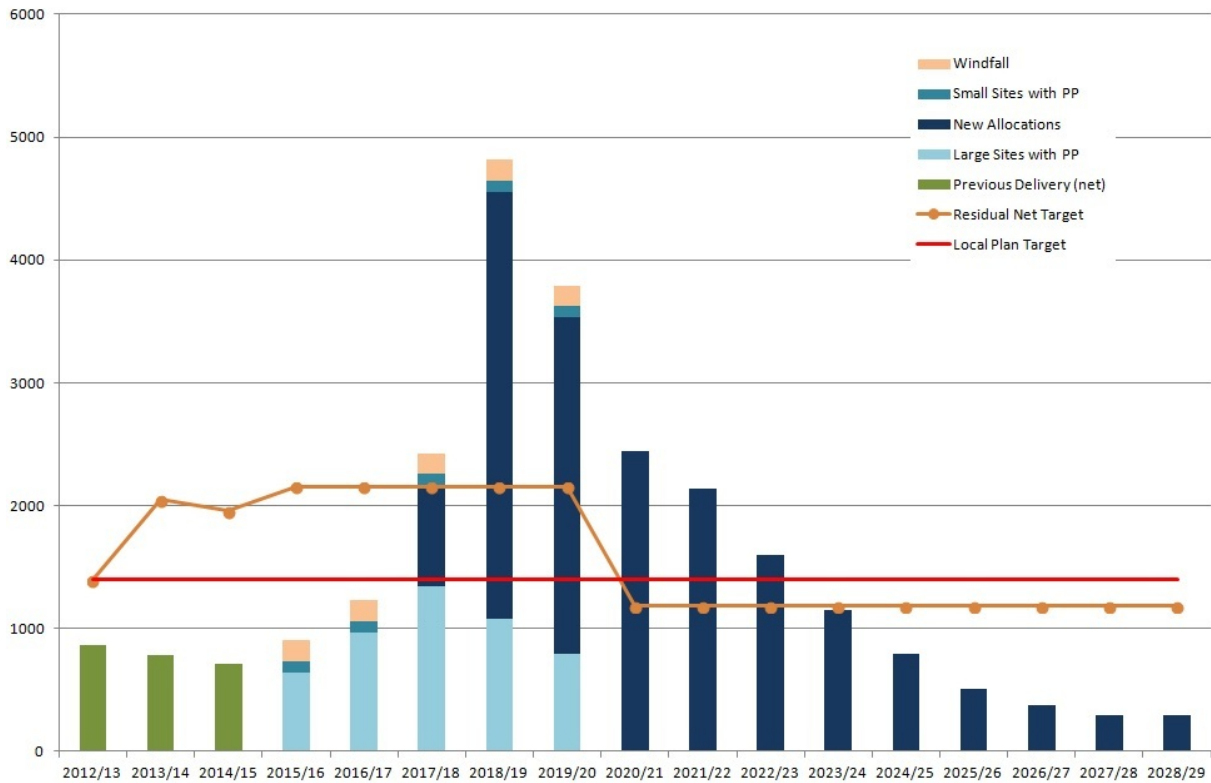
	Total
Planning permissions (large sites)	4,832
Planning permissions (small sites)	459
Existing Local Plan Allocations	0
Emerging Local Plan Allocations	7,060
Windfall allowance	848
Total dwellings in the 5 year existing supply	13,199
Annual residual requirement (including 20% buffer)	2,125
5 year net residual requirement (including 20% buffer)	10,625
5 year supply position	6.2
<i>Please note - figures may not total due to rounding.</i>	

4.12 The Beverley & Central and Holderness & Southern Coastal sub areas have a total five year existing supply of 6,019. The *Strategy Document* (Policy S5) requires approximately 45 percent 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 4,910. Using these figures it can be calculated that the HHMA has a 6.1 year supply.

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

- 4.13** The housing trajectory below (Figure 2) projects the five year supply to 2029-2030 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 trajectories are based purely on five year supply and do not include assumptions about potential supply. Potential supply is considered further through step three.
- 4.14** The trajectories are based on build rates and pre-build lead-in times which are applied pro rata for all sites. In reality, sites will come forward in a less predictable way which is impossible to predict with certainty, reflecting market conditions and the capacity of the development industry to deliver housing. These are rolling trajectories. New sites will be granted permission which will add to the supply as existing sites are built out.
- 4.15** The trajectory (Figure 2) shows the five year supply against the residual housing requirement to 2029-30. The supply of housing from emerging allocations identified in the *Submission Allocations Document* (January 2014) and accompanying Schedule of Modifications (March 2015) is also shown. The trajectory shows the level of supply available (deliverable sites) as per the definitions set out in the NPPF. The actual rate of delivery of housing will be determined by, amongst other things, the capacity of the market to deliver (e.g. Building industry's infrastructure, skilled labour, finance and materials) and the demand for new homes in different locations across the East Riding. The reality is that there can be wild fluctuations in delivery as shown by past completion rates, which mean that it is important to recognise that the trajectory is unlikely to be a straight line projection.

Figure 2 East Riding Supply Trajectory



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

Assessment of 6-15 year supply

4.16 The 6-15 year supply consists of;

1. Dwellings from sites identified as allocations in the *Submission Allocations Document* (January 2014) and accompanying Schedule of Modifications (March 2015) 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. 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.
3. Dwellings from sites identified as allocations in the *Submission Allocations Document* (January 2014) and accompanying Schedule of Modifications (March 2015) 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.

- 4.17** With regards to the first source of 6-15 year supply, applying the assumptions detailed in chapter 3, means that 9,069 dwellings will be built out in years 6-15 on sites identified as emerging allocations without permission.
- 4.18** With regards to the second source of 6-15 year supply, there are 138 sites with a current planning permission. Applying the assumptions detailed in chapter three, means that 1,713 dwellings from these sites will be built out in years 6-15.
- 4.19** With regards to the third source of 6-15 year supply. 12 emerging Local Plan allocations (or 642 dwellings) are identified in the 6-15 year supply and have increased lead-in times (listed in paragraph 4.8). The total supply from these three sources is therefore 11,424.

Table 12 - 6-15 year supply position

	6-15 years
1. Emerging Local Plan Allocations (too large to be built out in five years)	9,069
2. Planning permissions (large sites, too big to be built out in five years)	1,713
3. Emerging Local Plan Allocations identified in the 6-15 year supply only (as a result of increased lead-in times)	642
Total	11,424

Assessment of Potential Supply

- 4.20** For clarity, the potential supply comprises of;
1. Sites not identified as allocations in the *Submission Allocations Document* (January 2014) and accompanying Schedule of Modifications (March 2015) and without planning permission.
 2. Sites identified as existing Local Plan allocations which do not benefit from planning permission.
- 4.21** With regards to the first source of potential supply, there are 636 sites in the SHLAA which are not identified as allocations in the *Submission Allocations Document* (January 2014) and accompanying Schedule of Modifications (March 2015) and do not have planning permission. The sites have a total capacity of 72,405 dwellings. 14,425 of these are considered developable.
- 4.22** With regards to the second source of potential supply, there are 48 existing Local Plan allocations (or part thereof) which do not benefit from planning permission and are not being taken forward as new allocations. These sites have a total capacity of 2,022 dwellings. 46 of these sites (1,989 dwellings) are considered not currently developable.

This is because a significant constraint has been identified and/or the *Strategy Document* (Policy S5) does not support the identification of sites for allocation in that settlement. The developable existing allocations have a total theoretical capacity of 33 dwellings.

4.23 In summary, this means 74,427 dwellings form the potential supply. 14,458 of these are considered currently developable.

4.24 Therefore, 59,969 dwellings 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 constraint(s) affecting the development of the site.

Table 13 - Potential Supply Position

Sites not identified as emerging allocations	72,405
Existing Local Plan Allocations	2,022
Total potential supply	74,427
Developable Potential Supply	14,458
Currently Undevelopable Potential Supply	59,969

Step 4 - Broad Locations

4.25 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. The sites (or 'land bids') submitted to the Council for consideration by landowners and developers form part of the potential supply and were considered for allocation through the *East Riding Local Plan*.

Housing Market Area Position

4.26 Planning Practice Guidance (PPG) (Paragraph 001, 3-007-2014306) states 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 2014 is reported in table 14 below.

Table 14 - Hull City Council five year land supply position

Total dwellings in the five year existing supply (including windfall)	5,402
Five year net residual requirement (including 20% buffer)	4,986
Five year supply position	5.41

5 Summary and Conclusions

- 5.1** The SHLAA has identified over 900 sites in total. After non-implementation has been accounted for, 5,291 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 *Submission Allocations Document* (January 2014) and accompanying Schedule of Modifications (March 2015) without a current planning permission in the next five years is 7,029.
- 5.3** A windfall allowance of 848 dwellings has also been included within the five year land supply.
- 5.4** 74,427 dwellings form the potential supply: 14,458 of these are developable; over 59,969 are considered currently undevelopable.
- 5.5** The number of dwellings that can be delivered in the next five years (the deliverable supply) is 13,199. Comparing this figure to the five year residual requirement of 10,625 (including the additional 20 percent buffer) means, that the East Riding as a whole has a **6.2 year supply of deliverable housing sites**.
- 5.6** 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

- 5.7** 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;
 - 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 Working Groups 2015

Core Working Group Members

- Organisations representing national house builders (Barratt and David Wilson Homes, Linden Homes, Persimmon Homes).
- Organisations 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 their respective SHLAAs.
- A planning officer from the Development Management Section of East Riding of Yorkshire Council.

Wider Working Group Members

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

Appendix B

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**.

If English is not your first language and you would like a translation of this document, please telephone **01482 393939**.