

East Riding of Yorkshire Council

Strategic Housing Land Availability Assessment

November 2013

(Updated January 2014)



East Riding Strategic Housing Land Availability Assessment (SHLAA) (Updated January 2014) Errata

The 2013 SHLAA was published in November 2013. A number of changes have been made to the November 2013 report. These changes have been made to correct minor errors and improve understanding of the document. The table below sets out the changes. An updated version of the SHLAA, incorporating the changes, can be found below. **Please note, there is no change to the East Riding wide five year land supply position as a result of the revisions set out below.**

<u>Original Document Reference</u>	<u>Change</u>
Throughout	References to ' <i>Publication</i> ' East Riding Local Plan (December 2013) have been amended to ' <i>Proposed Submission</i> ' (January 2014)
Page iii (Para. A.7)	...a backlog of 1,844 dwellings has been identified from the start of the plan period (2012-13).
Page 5 (Para.1.5)	<ul style="list-style-type: none"> Draft National Planning Policy Framework Guidance (NPPFG)
Page 8 (Para.1.15)	Publication Proposed Submission Local Plan Strategy Document (December January 2013 4)
Page 9 (Para.1.17)	Publication Proposed Submission Local Plan Allocations Document (December January 2013 4)
Page 11(Para. 1.30)	Table 2 (overleaf) shows how the five year housing requirement for the East Riding has been calculated, taking into account housing shortfall (or 'backlog') from 2011-12-13 (start of plan period), including a 20% buffer.
Page 15 (Para.2.4)	Members of the wider working group Both working groups had an opportunity to comment on the proposed SHLAA methodology.
Page 21 (Table 4)	Easington*
Page 22 (Para.3.7)	Sites in the SHLAA are put into two three broad categories: five year ('existing' supply), 6-15 year and 'potential' supply.
Page 23 (Para. 3.14)	Only those existing allocations located within or closely related to settlements within the Publication Proposed Submission Strategy Document settlement network are considered for inclusion within the five year supply.
Page 24 (<u>New</u> Para.3.20)	<p><u>The six to fifteen year supply</u> The 6-15 year supply consists of:</p> <ol style="list-style-type: none"> Dwellings from sites identified as allocations in the <i>Proposed Submission Local Plan Allocations Document</i> 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 larger sites; 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 larger sites; and Dwellings from sites identified as existing Local Plan allocations (or part thereof) 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 larger sites.
Page 24 (Para.3.21)	For clarity, the potential supply comprises of: Dwellings from sites identified as allocations in the Proposed Submission Local Plan 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 larger sites
Page 25 (<u>New</u> Para.3.23)	The assessment considers some of potential supply to be currently undevelopable. Sites that are considered currently undevelopable are affected by national policy restrictions (identified in para. 3.27 below), and/or are remote from the built form of a settlement in the settlement network. There may also be insurmountable constraint(s) affecting the development of the site.
Page 25 (Para.3.25)	SHLAA ID - A unique ID for the site., consisting of the name of the settlement that the site is located in and a number that is specific to the amount of sites located in that settlement. This ID cross-references to the sites shown on the map in Appendix B.
Page 27 (Para 3.25)	Overall deliverability: ...If a site is currently suitable, available and achievable it will be placed into the 1-5 five year supply. A site that has outstanding issues to be resolved is placed in the 6-15 year 'potential' supply.
Page 27 (Para 3.25)	Deliverability in years: This is broken into the 3 time periods of the plan: years 0-5; years 6-10; and years 11-15. The number of dwellings that can theoretically be built in the plan period will be shown here. The development of some sites will run over different time periods.
Page 28 (Para. 3.32)	...The assumptions are useful in that they indicate the expected capacity of potential housing sites included within the assessment. These assumptions do not

	apply to sites with planning permission where the number of units is already specified.
Page 35 (Para.4.1)	...This assessment is broken down into deliverable (0-5years) and developable (6-15 years) supply the 5 year ('existing' supply), 6-15 year supply and 'potential' supply.
Page 35 (Para.4.1)	Step 3: Assessing the six to fifteen overall and potential supply
Page 35 (Para. 4.2)	The remaining dwelling capacity of large sites with planning permission is 2,184 2,357 . Due to the projected 20% non-implementation of permissions, as well as considering build rates, it is anticipated that 1,748 1,886 of these could be built out in the next five years, leaving little coverage in the 6-15 year supply period.
Page 36 (Para. 4.4)	The combined total of dwellings from all sites (large and small) with a current planning permission is 3,009 3,182 . The number of these that can be built in the first five years (after applying the non-implementation assumptions) is 2,276 2,414 , 76% of the total number with permission.
Page 36 (Para. 4.7)	This re-appraisal process has identified that the following 3 6 allocations (or part thereof) should be excluded from the five year supply because a significant constraint has been brought to the Councils attention: <ul style="list-style-type: none"> • PRN1a (Preston) - Majority of site is not available. This area would form the suitable access for the site. • Part of S6b (Bubwith)- Site does not appear to have a suitable connection to the public highway. • Part of HRN1d (Hornsea) - Site is affected by coastal erosion. • Part of Mark7 (Market Weighton) - Part of the site is required for the Mill Beck Reservoir Scheme (12/02790/STPLF). • Part of Mark10 (Market Weighton) - Site currently in use as allotments. No residential land bid on the site. • Part of SK2 (Skirlaugh) - Playing fields have not been relocated.
Page 36 (Para. 4.8)	...This process resulted in the following 13 existing allocations (undeveloped without planning permission) being excluded from the five year supply... <ul style="list-style-type: none"> • Keyingham - KEY3, KEY42
Page 37 (Para. 4.9)	In addition to the above considerations, the remaining existing Local Plan allocations in Goole have had a longer lead-in time applied to them (30 or 42 months) based on the approach to development in Goole set out in the Publication Proposed Submission Local Plan (as outlined in paragraph 3.389).
Page 37 (Para. 4.10)	In summary, there are 60 undeveloped existing housing allocations identified in the four Local Plans (in locations within or closely related to settlements in the settlement network). 169 existing allocations (or part thereof) are not included in the five year supply... 447 existing Local Plan allocations (or part thereof) are still considered deliverable in the next five year period (these contribute 596-612 dwellings towards the five year supply).
Page 37 (Para. 4.11)	There are also 19-16 existing Local Plan allocations (or part thereof) located in areas outside the settlement network. These allocations are classed as 'non-hierarchy' allocations and do not form part of the five year supply.
Page 37 (Para. 4.12)	11,221-11,156 dwellings could be provided on emerging <i>East Riding Local Plan</i> allocations without a current planning permission in the first five years.
Page 38 (Para. 4.14)	... The total five year existing supply is 14,882 14,971 .
Page 38 (Para.4.16)	The Hull Housing Market Area (HHMA) has a total five year existing supply of 6,953908
Page 39 (Table 11)	<i>See Appendix for Updated Table 11</i>
Page 40 (Para.4.17)	The housing trajectory below projects the existing supply to 2028/2029 applying the methodology.
Page 41 (<u>New</u> Para.4.20)	Step 3: Assessing the six to fifteen overall and potential supply Assessment of six to fifteen year supply The 6-15 year supply consists of: <ol style="list-style-type: none"> 1. Dwellings from sites identified as allocations in the <i>Proposed Submission Local Plan Allocations Document</i> 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 larger 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; and 3. Dwellings from sites identified as existing Local Plan allocations (or part thereof) 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 larger sites.

Page 41 (New Para.4.21)	With regards to the first source of 6-15 year supply, there are 159 sites identified as allocations in the <i>Proposed Submission Local Plan Allocations Document</i> . Applying the assumptions detailed in chapter 3, means that 9,271 dwellings from these sites will be built out in years 6-15.
Page 41 (New Para. 4.22)	With regards to the second source of 6-15 year supply, there are 128 sites with a current planning permission. Applying the assumptions detailed in chapter 3, means that 96 dwellings from these sites will be built out in years 6-15.
Page 41 (New Para.4.23)	With regards to the third source of 6-15 year supply. Applying the assumptions detailed in chapter 3, means that 150 dwellings from existing Local Plan allocations (or part thereof) from these sites will be built out in years 6-15.
Page 41 (New Table 12)	<i>See Appendix for Table 12</i>
Page 41 (Para.4.20)	<p>Assessment of potential sites supply</p> <p>The above information clearly highlights the importance of assessing potential housing sites outside of the existing supply in order to identify a fifteen year supply of developable sites. After the initial sieving process relating to small sites, sites outside the Settlement Network and in other unsuitable locations, The potential supply comprises of:</p> <ol style="list-style-type: none"> 1. Dwellings from sites identified as allocations in the <i>Publication Local Plan Allocations Document</i> 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; <ol style="list-style-type: none"> 1. Sites not identified as allocations in the <i>Publication Proposed Submission Local Plan Allocations Document</i> and without planning permission; 2. Sites identified as existing Local Plan allocations located in areas outside the settlement network. These allocations are classed as 'non-hierarchy' allocations and do not form part of the five year supply; and 3. Sites identified as existing Local Plan allocations but which are, at this time, subject to (a) constraint(s).
Page 41 (Para.4.21)	With regards to the first source of potential supply, there are 161 sites identified as allocations in the <i>Publication Local Plan Allocations Document</i>. Applying the assumptions detailed in chapter 3, means that 9,242 dwellings from these sites will be built out in years 6-15, contributing towards the potential supply.
Page 41 (Para.4.22)	With regards to the second first source of potential supply, there are 652 578 sites have not been identified as allocations in the <i>Proposed Submission Local Plan Allocations Document</i> . These sites contribute 77,931 dwellings towards the potential supply. These sites have a total capacity of 71,830 dwellings (some of which are considered currently undevelopable).
Page 41 (Para.4.23)	With regards to the third second source of potential supply, 16 'non-hierarchy' allocations (or part thereof) contribute 621 dwellings towards the potential supply are considered currently undevelopable as they are remote from the built form of a settlement in the settlement network. These sites contribute 621 dwellings towards the potential supply. These sites have a total capacity of 475 dwellings.
Page 42 (New Para. 4.27)	With regards to the third source of potential supply, there are 19 existing Local Plan allocations (or part thereof) which are not included in the five year supply because they are, at this time, subject to (a) constraint(s). These sites contribute 1,334 dwellings towards the potential supply.
Page 41 (Para.4.24)	In summary, this means 87,794 dwellings 73, 583 dwellings form the potential supply. 38, 821 of these are considered developable (a theoretical 43 19 year supply of developable sites). 34,818 dwellings are considered currently undevelopable because they are affected by national policy restrictions (identified in para. 3.27), and/or are remote from the built form of a settlement in the settlement network. There may also be insurmountable constraint(s) affecting the development of the site. Of the 87,794, 41, 974 dwellings can theoretically be delivered in the next five year period.
Page 41 (Para.4.25)	Table 11 (below) gives the complete supply position for all types of site across the entire plan period.
Page 43 (New Table 13)	<i>See Appendix for Table 13</i>
Page 43, 5.1	The SHLAA has identified 1,005 918 sites in total which have a theoretical capacity to deliver 1113,375 dwellings . After non-implementation has been accounted for 2,276 2,414 of these dwellings could be provided on sites that currently have permission (both large and small sites) in the first five years.
Page 43, 5.2	596 612 dwellings could be provided on existing Local Plan allocations without a current planning permission in the first five years.
Page 43, 5.3	169 existing Local Plan allocations have been excluded from the five year supply...
Page 43, 5.4	11,221 11,156 dwellings could be provided on emerging <i>Local Plan</i> allocations without a current planning permission in the first five years.
Page 43, 5.6	87, 794 73, 583 dwellings form contribute to the potential supply. 34,762 of these are developable. 38, 821 are considered currently undevelopable. 42, 974 of

	these could theoretically come forward in the first five years.
Page 43, 5.7	The number of dwellings that can be delivered in the first five years (the existing supply) is 14,882 14,971

Appendix

Table 11 - Five year supply position

	Beverley & Central	Bridlington & Coastal	Driffield & Wolds	Goole & Humberhead Levels	Holderness & Southern Coastal	Vale of York	Total East Riding
Planning permissions (large sites)	633	152	418	256	243	183	1,886
Planning permissions (small sites)	149	109	64	73	58	75	528
Existing Deliverable Local Plan Allocations	191	0	118	164	88	51	612
Emerging Local Plan Allocations	4,326	1,678	1,291	1,118	907	1,835	11,156
Windfall allowance	245	116	81	106	68	173	789
Total five year existing supply	5,544	2,055	1,972	1,717	1,364	2,317	14,971
Annual residual requirement (including 20% buffer and backlog)	803	309	263	275	143	255	2,048
Five year net residual requirement (including 20% buffer and backlog)	4,015	1,545	1,315	1,375	715	1,275	10,240
5 year supply position	6.9	6.7	7.5	6.2	9.5	9.1	7.3

Please note - figures may not total due to rounding.

Table 12 - Six to fifteen year supply position

	6-15 years
Planning permissions (large sites)	96
Planning permissions (small sites)	0
Existing deliverable Local Plan Allocations	150
Emerging Local Plan Allocations	9,271
Windfall allowance	N/A
Total	9,517

Table 13 - Potential supply position

Sites not identified as emerging allocations	71, 830
Non - hierarchy allocations	475
Existing currently constrained Local Plan Allocations	1,278
Total potential supply	73,583
Developable Potential Supply	34,762
Currently Undevelopable Potential Supply	38,821

A Executive Summary	iii
1 Introduction	5
2 Consultation	15
3 Methodology	19
4 Assessment Findings	35
5 Summary and Conclusions	45
Appendix A	48
Appendix B	50

List of Tables

Table 1 - Housing completions 2012-13	10
Table 2 - Housing completions and residual housing requirement	12
Table 3 - Brownfield completions	14
Table 4 - East Riding Settlement Network	21
Table 5 - Developable areas	29
Table 6 - Pre-build lead-in times	30
Table 7 - Annual build rates	31
Table 8 - Windfall completions in the East Riding	31
Table 9 - Windfall permissions in the East Riding	32
Table 10 - Calculating the windfall allowance	33
Table 11 - Five year supply position	39
Table 12 - Six to fifteen year supply position	41
Table 13 - Potential Supply Position	43

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 forms an important part of the evidence base for the *East Riding Local Plan*, the name for the portfolio of planning documents, that together will provide the framework for managing development and addressing key planning issues in the East Riding.
- A.2** 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* will allocate 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. The broad methodology for the SHLAA is set out in the 2007 national practice guidance issued by the Department for Communities and Local Government (DCLG). This requires potential housing sites to be tested according to a framework that considers their:
- Suitability (is the site a suitable location for housing?);
 - Availability (is the site available now or is there a reasonable prospect of it becoming available?); and
 - Achievability (is there a reasonable prospect of housing being achieved on the site?).
- A.4** If these criteria are met then a site is considered to be developable and will contribute to the potential housing figure over the plan period.
- A.5** To support the Proposed Submission *East Riding Local Plan* and ensure the information contained within the SHLAA is as up to date as possible, the 2013 SHLAA takes into account housing completions and other information (including planning approvals and lapsed housing sites) available between April 2012 and November 2013 (20 month period) to calculate the five year housing land supply position.
- A.6** The 2013 SHLAA has been prepared in accordance with relevant national guidance including the draft planning practice guidance accompanying the National Planning Policy Framework (NPPF). In particular, a core working group, made up of Council officers, representatives from the house building sector (house builders, land agents) and other stakeholders was established to help steer the work and to respond to issues as they arose. 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 groups.
- A.7** In reviewing the level of housing completions in the 20 month period (956) against the 20 month emerging Local Plan housing requirement (including a 20% buffer) (2,800), a backlog of 1,844 dwellings has been identified from the start of the plan period (2012-13).

This shortfall is sought to be addressed in next five year period which results in an annual residual housing requirement of 2,048 dwellings. This includes an additional 'buffer' of 20% in terms of housing land supply to ensure choice and competition in the market for land.

A.8 The assessment finds that there is a **7.3 year supply of deliverable housing sites in the East Riding as a whole**. This comprises:

- Sites with planning permission;
- Existing deliverable Local Plan allocations;
- Emerging *East Riding Local Plan* allocations; and
- A windfall allowance.

A.9 Until the *East Riding Local Plan* is adopted (expected early 2015), existing allocations without a current planning permission (yet to be developed) identified in the four existing Local Plans continue to form part of the development plan which is the starting point for making decisions on planning applications. The 2013 SHLAA re-appraises the existing allocations to determine which sites remain deliverable in the next five year period. Only those existing allocations located in or closely related to settlements within the *Proposed Submission Strategy Document* settlement network are considered for inclusion within the five year housing land supply.

A.10 Given the Council's continued commitment to affording the emerging *East Riding Local Plan* 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 *Proposed Submission Local Plan Allocations Document*, a significant number of dwellings from emerging allocations can be considered deliverable in the next five year supply period. This means a much greater supply of deliverable land for housing is available in the East Riding. Irrespective of the weight applied to the emerging *Local Plan*, the SHLAA provides an assessment of each site's deliverability.

A.11 The report finds there is an abundance of potentially developable sites in all sub areas to meet provision over the next 15 years, and well beyond this. Therefore, the assessment finds that there is no need to outline any broad growth areas.

A.12 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 a *Strategic Housing Land Availability Assessment (SHLAA)*. The SHLAA is an extensive survey of existing and potential housing sites in the East Riding. It forms an important part of the evidence base for the *East Riding Local Plan*.
- 1.2** It is important to note the distinction between the SHLAA and the emerging *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* will allocate 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. The preparation of the *Proposed Submission Local Plan Allocations Document* involves a rigorous sustainability assessment of individual sites against an adopted *Site Assessment Methodology* (March 2011) as well as full consultation with the wider community. The *Proposed Submission Allocations Document* will be examined by an independent planning inspector before it can be adopted by the Council.
- 1.3** The SHLAA also 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 capacity of settlements to accommodate housing growth.
- 1.4** **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)
- Draft National Planning Policy Framework Guidance (NPPG) (issued for consultation between August - October 2013)

The 'Development Plan'

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

The Emerging East Riding Local Plan

- *Proposed Submission Local Plan Strategy Document* (January 2014)
- *Proposed Submission Local Plan Allocations Document* (January 2014)
- *Bridlington Town Centre Area Action Plan (AAP)* (Adopted January 2013)

Position Statements

- *Cabinet report on the Revocation of the Regional Spatial Strategy for Yorkshire and the Humber* (February 2013)

Other Evidence and considerations

- *The Strategic Housing Market Assessment (SHMA)* (October 2011)
- Recent patterns of development
- Revocation of the Yorkshire and Humber Regional Spatial Strategy (RSS) in February 2013.

National Policy

The National Planning Policy Framework

- 1.6** The *National Planning Policy Framework* (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.

1.8 In addition to identifying sufficient specific deliverable sites for the first five years of the plan period, a further supply of specific developable sites for years 6-15 should be identified. To be considered developable, sites should offer a suitable location for housing development and there should be a reasonable prospect the site is available and can be viably developed at the point envisaged. Where it is not possible to identify sufficient sites for 15 years, broad locations for future growth should be identified.

1.9 The NPPF also considers:

- **Viability** - local planning authorities should consider the likely economic viability of land to help inform whether a site is deliverable (Paragraph 47). This formalises what is set out in the 2007 practice guidance which states that assessing the achievability of a site for housing is a judgement about the economic viability of a site.
- **Supply buffer** - local planning authorities are required to include an additional allowance or 'buffer' of 5% (moved forward from later in the plan period) in terms of supply to ensure choice and competition in the market for land. Local planning authorities with a record of persistent under delivery of housing should consider applying a 20% buffer (Paragraph 47).
- **Windfall sites** - local planning authorities may make an allowance for windfall sites in their five year supply if they have compelling evidence such sites have consistently become available in the local area and will continue to provide a reliable source of supply (Paragraph 48).

1.10 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 2012 SHLAA identified that as of the 1 April 2012, there was a 4.9 year supply of deliverable housing sites in the East Riding. In acknowledgement of this shortfall, and in light of the presumption in favour of sustainable development set out in the NPPF, the Council has been taking a pragmatic and positive approach to the determination of planning applications for residential development. In doing so, the Council has been affording appropriate weight in the decision making process to proposed housing allocations in the emerging *East Riding Local Plan*. Where developers are promoting sites in advance of the adoption of the *East Riding Local Plan*, the Council has been taking a supportive approach where sites are identified as preferred allocations through the *East Riding Local Plan* process.

Draft Planning Practice Guidance

1.11 The 2007 national practice guidance issued by the Department for Communities and Local Government (DCLG) is shortly expected to be replaced by new planning guidance accompanying the NPPF. At the time of publication of the 2013 SHLAA, the new planning practice guidance was in draft form and had not yet been issued by the Secretary of State. However, the Government has confirmed the draft planning guidance can be treated as a material consideration and as such, it has been taken into account through the preparation of the 2013 SHLAA.

The 'Development Plan'

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

1.12 The *Joint Structure Plan* (JSP) was adopted in June 2005. The saved JSP policies of most relevance to the SHLAA are DS3 (Towns), DS4 (Smaller settlements and the countryside) and H7 (Housing development in villages).

Existing Local Plans

1.13 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 governing the development of those sites have been saved and continue to be used.

The Emerging East Riding Local Plan

1.14 The *East Riding Local Plan Strategy and Allocations Documents* are expected to be adopted in early 2015. Paragraph 216 of the NPPF allows decision takers to give weight to relevant policies in emerging Local Plans according to:

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

Proposed Submission Local Plan Strategy Document (January 2014)

1.15 In response to the revocation of the Yorkshire and Humber Regional Spatial Strategy (RSS) in February 2013, the Council resolved to use the emerging *East Riding Local Plan* housing requirement for the purposes of assessing the five year land supply from 2013.⁽¹⁾

¹ Cabinet reported dated 26 February 2013

The *Proposed Submission Local Plan Strategy Document* makes provision for at least 1,400 (net) dwellings per annum in the East Riding to 2029. For information, the RSS equivalent figure was 1,150.

- 1.16** In light of the weight that can be afforded to emerging plans and the absence of saved Development Plan policies relating to the settlement network, the settlement network identified in the *Proposed Submission Local Plan Strategy Document* (Policy S5) provides the most up to date position to determine which sites are included in the SHLAA. Policy S5 confirms that the higher levels of the settlement network established through the Joint Structure Plan (JSP) will continue to be used. For clarity, the settlements included within the SHLAA are listed in Chapter 3 (table 4).

Proposed Submission Local Plan Allocations Document (January 2014)

- 1.17** The *Proposed Submission Local Plan 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)* - sets out the final allocations proposed for development (to be considered by an independent planning inspector).
- 1.18** 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 *East Riding Local Plan*. All land bids have been considered and assessed against an adopted *Site Assessment Methodology (2011)* providing a consistent basis for comparing the different options to enable the most suitable sites to be selected for future development.
- 1.19** 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.

Bridlington Town Centre Area Action Plan

- 1.20** The *Bridlington Town Centre Area Action Plan (AAP)* has now been adopted. It provides for housing in the Town Centre of Bridlington. The housing requirement identified in the AAP is included within the SHLAA.

Other Evidence and Considerations

The Strategic Housing Market Assessment

- 1.21** The *Strategic Housing Market Assessment (SHMA)* considers the characteristics of the housing markets within the East Riding, how they work now and potential changes in the future. This includes identifying the range of tenures needed to cater for housing demand and the scale of housing needed to meet the demand.
- 1.22** To understand the housing requirements of the East Riding and the ability of areas to accommodate development, a range of evidence including the SHMA, has informed an objective assessment of housing which reflects the consequences of past under delivery. This means that any under delivery in the previous plan period has been included in the new housing requirement for the East Riding as set out in the *Proposed Submission Local Plan Strategy Document* (1,400 net dwellings per annum).

Recent Patterns of Development

- 1.23** Table I shows the annual housing completions in the East Riding in 2012-13. The 'gross' figure indicates the total number of dwellings completed in 2012-13. The 'net' completions figure is important because it takes into account the losses from dwelling conversions, change of use and demolitions.

Table I - Housing completions 2012-13

Local Plan Sub Area	Gross	Net
Beverley & Central	354	311
Bridlington Coastal	158	124
Driffield & Wolds	100	84
Goole & Humberhead Levels	177	160
Holderness & Southern Coastal	106	93
Vale of York	102	89
Grand Total	997	861

- 1.24** The *Proposed Submission Local Plan Strategy Document* (Policy S5) requires approximately 45% of the total housing provision in the East Riding to be located in the East Riding part of the Hull Housing Market Area (HHMA). The Beverley and Central and

Holderness and Coastal sub areas together form the East Riding part of the HHMA. This means that in the period 2012-13, 404 of the 861 net completions in the East Riding (47%) were located in the HHMA.

Performance and Residual Targets

- 1.25** In the 2012-13 financial year, the net housing completions figure for the East Riding (861 dwellings) was fairly consistent with the net housing completions figure for the previous financial year (889 dwellings, as set out in the 2012 SHLAA). This reflects a continuing improvement in the housing market.
- 1.26** The Beverley and Central sub area had the highest level of completions in the East Riding in 2012-13, reflecting the strength of the housing market in this area. This was followed by the Goole and Humberhead Levels and Bridlington and Coastal sub areas. The Vale of York, Holderness and Southern Coastal, and Driffield and Wolds sub areas had the lowest level of housing completions in the East Riding in 2012-13.
- 1.27** Although there was some over provision against the former Regional Spatial Strategy (RSS) gross requirement of 1,190 dwellings per annum between 1996-97 and 2007-08⁽²⁾, for the period 2008-09 to 2012-13, there was under provision against the both the former RSS and emerging *East Riding Local Plan* requirement respectively.
- 1.28** Paragraph 47 of the NPPF requires local planning authorities to include an additional allowance or 'buffer' of 5% (moved forward from later in the plan period) in terms of supply to ensure choice and competition in the market for land. Local planning authorities with a record of persistent under delivery of housing should consider applying a 20% buffer. The housing under provision in the East Riding could now reasonably be considered as 'persistent'. Taking into account the need to significantly boost the supply of housing land as set out in the NPPF, the annual housing requirement for the East Riding will include a 20% buffer to ensure choice and competition in the market for land.
- 1.29** *To support the Proposed Submission East Riding Local Plan* and ensure the information contained within the SHLAA is an up to date as possible, the 2013 SHLAA takes into account housing completions and other information (including housing approvals and lapsed sites) available between April 2012 and November 2013 (20 month period) to calculate the five year housing requirement.
- 1.30** Table 2 (overleaf) shows how the five year housing requirement for the East Riding has been calculated, taking into account housing shortfall (or 'backlog') from 2012-13 (start of the plan period), including a 20% buffer.

2 net figures not available for the entire period

Table 2 - Housing completions and residual housing requirement

		Beverley & Central	Bridlington Coastal	Driffield & Wolds	Goole & Humberhead Levels	Holderness & Southern Coastal	Vale of York	Total
A	Net completions 2012 - 2013 (financial year)	311	124	84	160	93	89	861
B	Net completions April - November 2013	59	2	3	10	4	17	95
C	Total net completions (A+B)	370	126	87	170	97	106	956
D	Emerging Local Plan requirement (per annum)	548	209	175	193	102	173	1,400
E	Emerging Local Plan requirement (20 month period)	913	348	292	322	170	288	2,333
F	Emerging Local Plan requirement (20 month period) + 20% buffer	1,096	418	350	386	204	346	2,800
G	Backlog (F-C)	726	292	263	216	107	240	1,844
H	Backlog (G) / Five years	145	58	53	43	21	48	369
I	Emerging Local Plan requirement (per annum) + 20% buffer (F/20*12)	658	251	210	232	122	208	1,680
J	Annual Residual requirement (including 20% buffer and backlog) (H+I)	803	309	263	275	143	255	2,048
K	Five year residual requirement (including 20% buffer) (J*5)	4,015	1,545	1,315	1,375	715	1,275	10,240
Please note - figures may not total due to rounding								

- 1.31** The net completions figure between April - November 2013 is based on completions data available at the time of publication of the 2013 SHLAA. This figure (95 dwellings) is much lower than what the Council would normally expect to have been completed in this period of time (approximately 600 dwellings). In some instances, this is due to the time lag in terms of receipt of housing completions certificates. In many other instances, completions data is obtained following end of year site visits. Table 2 will be updated annually through the SHLAA process once all completions data has been received by the Council.
- 1.32** Reviewing the level of net housing completions between April 2012 and November 2013) (956) against a 20 month emerging Local Plan housing requirement of 2,800 (including a 20% buffer) means that a backlog of 1,844 dwellings has been identified. The Council has chosen to adopt the 'Sedgefield' method to deal with the backlog. This means the backlog has been front loaded within the next five year period.
- 1.33** The Sedgefield method has recently gained ground with the Secretary of State and is supported by the Planning Advisory Service's *'Ten Principles for owning your housing number- finding your objectively assessed needs'* which notes that the Sedgefield approach is... *"more closely aligned with the requirements of the NPPF and the need to significantly boost the supply of housing"* (page 14). The draft planning practice guidance also supports this approach, stating... *"local planning authorities should aim to deal with any under-supply within the first five years of the plan period where possible"* (ID 3-031-130729).
- 1.34** Front loading the backlog and applying a 20% buffer, results in annual residual requirement of 2,048 dwellings, or a five year requirement of 10,240 dwellings. **This five year requirement is used to determine the five year housing land supply position in the East Riding.** The Council received support for the application of a 20% buffer and the Sedgefield method from members of the SHLAA working group.

Brownfield Completions

- 1.35** Table 3 (overleaf) shows the past performance of the Council in achieving the re-use of previously developed land (PDL). The percentage of completions achieved on PDL was low (less than a third) before the *Managed Release Interim Planning Guidance (IPG)* was introduced in October 2003. After this date, the percentage of dwellings on PDL rose well above 50% and, despite the economic recession, continued to provide the majority of completions. 2011-12 is the only exception over the last seven years, when just less than half of the gross completions were located on brownfield land.

Table 3 - Brownfield completions

Financial Year	Brownfield Completions	Total completions (gross)	% Brownfield Completions
2001-02	319	1,550	21
2002-03	303	1,530	20
2003-04	637	1,907	33
<i>Managed Release Interim Planning Guidance introduced during 2003/04</i>			
2004-05	753	1,535	49
2005-06	667	1,468	45
2006-07	961	1,635	59
2007-08	982	1,850	53
2008-09	583	786	74
2009-10	343	499	69
2010-11	354	548	65
2011-12	426	962	44
2012-13	563	997	56
Total	6,891	15,267	45

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 to ensure a joined up approach. Private sector house builder input, in particular, helps provide an important market-based perspective.
- 2.2** The Council has consulted with neighbouring authorities throughout the SHLAA process in order to achieve a joined up approach. These authorities include Hull City Council, City of York Council, Doncaster Metropolitan Borough Council, North Lincolnshire Council, North East Lincolnshire Council, Ryedale District Council, Scarborough Borough Council and Selby District Council.
- 2.3** In addition to consultation with other authorities, the Council has set up two tiers of working group. The first is a core working group. This group comprises people who are central to the SHLAA development process. The members are invited to meetings to represent their wider groups throughout the SHLAA process. The 2013 core working group consisted of:
- A forward planning officer from Hull City Council who is involved in the production of the Hull SHLAA;
 - A planning officer from the Development Management Section of East Riding of Yorkshire Council;
 - Professionals representing national house builders (Linden Homes, Turley Associates, Barton Willmore); and
 - Professionals representing local house builders (Risby Homes, Scruton Homes, Peter Ward Homes).
- 2.4** The second working group is the wider working group. Both working groups had an opportunity to comment on the proposed SHLAA methodology.
- 2.5** Notable members of the wider working group included:
- The Environment Agency;
 - The Home Builders Federation;
 - The Highways Agency; and
 - A range of other house builders and agents.

- 2.6** 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.
- 2.7** 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 Draft Joint Planning Statement between Hull City Council and East Riding of Yorkshire Council has also been prepared. This covers those areas of both authorities that share housing markets and a travel to work area, setting out the strategic issues affecting both authorities, including housing.
- 2.8** Appendix A provides a full list of core working group and wider working group members for 2013.

Consultation

- 2.9** Developing the SHLAA methodology occurred over two meetings with the core working group and a formal consultation on the proposed methodology with both working groups. The methodology will be reviewed annually to reflect new guidance and local circumstances, in consultation with the working groups. Numerous aspects of the methodology were evidenced by the Council and discussed in detail over the course of the two meetings.

Developing the Methodology

- 2.10** The first meeting of the core working group was held on 20 June 2013 to discuss the methodology used for assessing sites and to present initial figures and evidence. The following elements of the methodology were discussed at this meeting:
- Density;
 - Net developable area;
 - Build rates; and
 - Pre-build lead- in times.
- 2.11** Some of the assumptions were agreed at this meeting. For small sites, it was agreed that it is reasonable to assume 100% of the area of a site could potentially be developed for housing. The net developable area assumptions contained in the 2012 SHLAA were also considered to be a reasonable basis for the 2013 SHLAA. With regards to pre-build lead- in times, it was agreed that the existing thresholds ('fewer than 15 plots' and '15 or more plots') may no longer be appropriate going forward.

- 2.12** The core working group requested additional evidence be collected and presented in relation to:
- Density rates of recent approvals;
 - Build rates, particularly of larger schemes;
 - Emerging *East Riding Local Plan* allocations for which a development brief must be prepared; and
 - Existing undeveloped Local Plan allocations (and whether these are being taken forward through the emerging *East Riding Local Plan*).
- 2.13** The above additional evidence was presented and discussed at a second meeting (29 July 2013). With regards to the emerging *East Riding Local Plan* allocations for which a development brief must be prepared, it was noted that there are actually few instances where the Council would require infrastructure to be provided prior to the commencement of development. In most cases, the Council would expect infrastructure to be phased alongside the development, meaning no extra lead-in time would be required. The group noted that the pre-application discussions in relation to the emerging *East Riding Local Plan* allocations would inevitably reduce the pre-build lead-in times of some sites.
- 2.14** The need to re-appraise the deliverability of existing Local Plan allocations (undeveloped, without a current planning permission) in light of potentially significant constraints identified through the preparation of the *East Riding Local Plan* was supported by the core working group.
- 2.15** Other elements of the methodology discussed at this meeting included:
- Completions and residual housing target;
 - 5/20% buffer as required by the NPPF; and
 - Incorporating an element of windfall in the supply (the intention to make a 15% reduction for garden land was supported by the working group).
- 2.16** It was agreed that following the meeting, the Council would request evidence with regards to build rates from the wider working group and that the outstanding elements of the methodology would be reported to both working groups by way of a formal consultation on the proposed methodology. The Council also met with one local house builder on a one to one basis to discuss their concerns in relation to the assumed density rates applied to the assessment of potential sites.

Finalising the methodology

2.17 The Council received 10 responses to the proposed methodology consultation. The key issues raised included:

- The application of a 5/20% buffer;
- The approach to making up the housing shortfall;
- Whether existing undeveloped allocations identified in the four existing Local Plans can contribute to the five year supply; and
- The approach to density (whether a differentiation should be made between brownfield and greenfield sites, whether it would be more appropriate to apply the emerging *Local Plan* policy).

2.18 All responses to the proposed methodology consultation were considered and taken into account during the production of the final SHLAA report. Where there were differences of opinion in relation to any of the above points, the rationale behind the approach adopted in the 2013 SHLAA has been set out.

2.19 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 2007 national practice guidance provides more detailed advice for carrying out a SHLAA, supporting the advice contained in the NPPF, including setting out the core requirements and objectives of the assessment. These are:
- A list of sites, cross-referenced to maps showing locations and boundaries of specific sites;
 - An assessment of the deliverability/developability of each identified site to determine when each site is realistically expected to be developed;
 - An assessment of the potential quantity of housing that could be delivered on each individual site; and
 - The identification of potential constraints on the delivery of housing on each site and where appropriate, recommendations on how these constraints may be overcome.
- 3.2** The guidance places emphasis on the importance of a partnership approach to undertaking the assessment involving local planning authorities working collaboratively where possible and engaging key stakeholders such as housing industry professionals. A partnership approach allows local planning authorities to share experience and to draw on the experience of key stakeholders as well as adding transparency to the process.
- 3.3** The guidance states that: “...*the scope of the assessment should not be narrowed down by existing policies designed to constrain development, so that the local planning authority is in the best possible position when it comes to decide its strategy for delivering its housing objectives*” (page 11).
- 3.4** The national practice guidance issued by the Government in 2007 will shortly be replaced by new planning guidance accompanying the NPPF. The Government has confirmed the draft planning guidance can be treated as a material consideration and, as such, it has been taken into account through the preparation of the 2013 SHLAA.
- 3.5** In light of the draft guidance, the following points relating to the SHLAA methodology are considered in detail in this chapter:
- The potential contribution of existing Local Plan allocations (undeveloped, without planning permission), towards the five year supply
 - The potential contribution of emerging allocations, as set out in the *Proposed Submission East Riding Local Plan* towards the five year supply

Assessed Settlements

3.6 The NPPF (Paragraph 216) states that decision takers may give weight to relevant policies in emerging plans, taking into account the stage of preparation of the emerging plan. Given the weight that can be afforded to emerging Local Plans and the absence of any saved Development Plan policies relating to the Settlement Network, it is considered appropriate to use the Settlement Network in the *Proposed Submission Strategy Document* (Policy S5) to determine the settlements included within this SHLAA. The list of settlements included in the SHLAA are illustrated below by Figure I and listed below in Table 4.

Figure I Local Plan Settlement Network

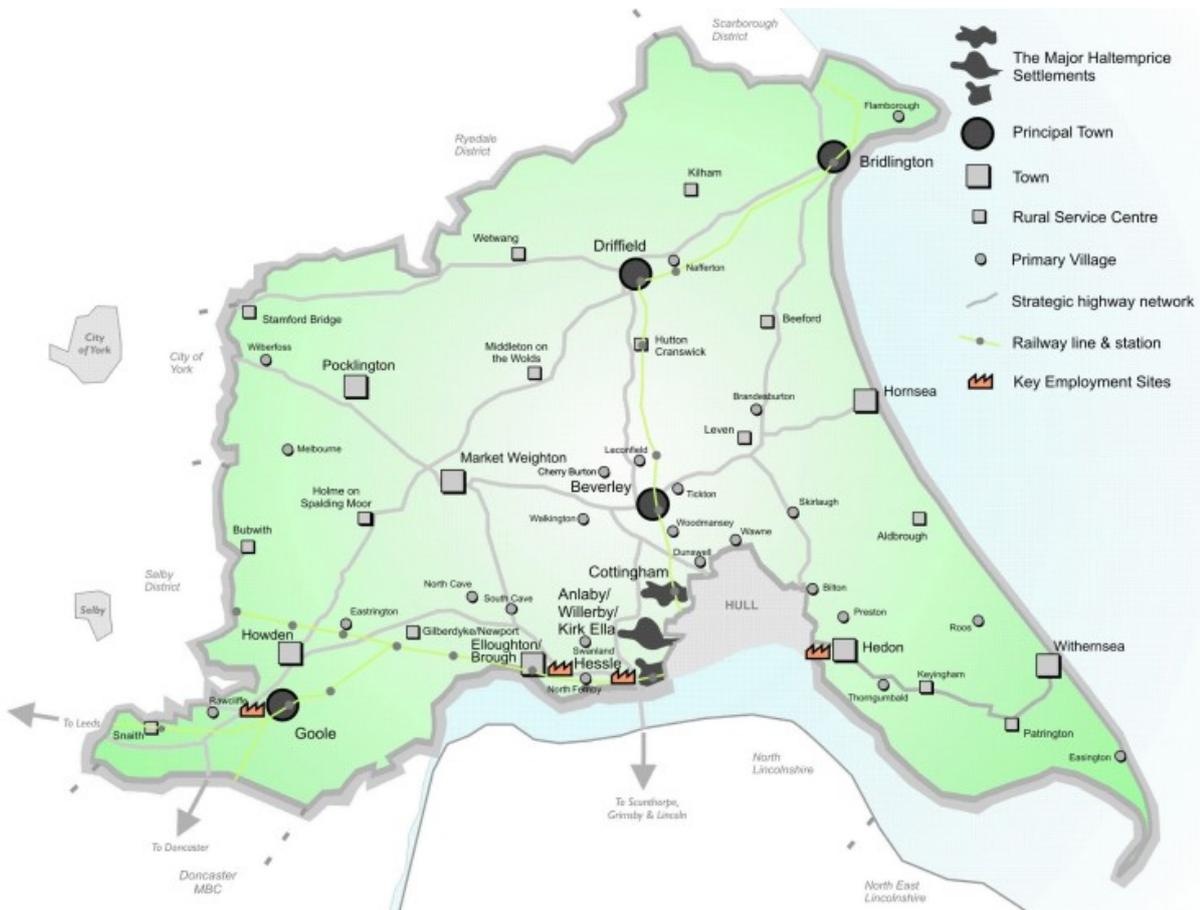


Table 4 - East Riding Settlement Network

Major Haltemprice Settlements		
Anlaby ⁽³⁾	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.

Populating the SHLAA

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

The five year (existing) supply

- 3.8** Existing supply consists of sites which do not have policy restrictions and can be developed within five years. There are three sources of existing supply: sites with planning permission; housing allocations; and a windfall allowance.

1) Sites with Planning Permission

Large sites with planning permission

- *Sites with five dwellings or more with either outline or full permission which remain undeveloped (though they may have commenced but not completed building work).*

Small sites with planning permission

- *Sites with fewer than five dwellings with either outline or full permission which remain undeveloped (though they may have commenced but not completed building work). These sites are assessed in less detail than all other sites and are not included on the SHLAA maps (Appendix B).*

2) Housing Allocations

- 3.9** The Planning Advisory Service's, *Strategic Housing Land Availability Assessment: Frequently Asked Questions* (January/February 2008) states that a site can still be considered deliverable even if it doesn't have a current planning consent.

Existing Deliverable Local Plan Allocations

- *Sites identified as allocations in the four existing Local Plans without a planning permission that are yet to be developed.*

- 3.10** The draft national planning guidance accompanying the NPPF states that sites in existing development plans will... "*generally be considered suitable for development although it may be necessary to assess whether the circumstances have changed which would alter their suitability. This will include a re-appraisal of the suitability of previously allocated land*" (ID 3-019-130729). In light of this guidance, the 2013 SHLAA includes a re-appraisal of the existing Local Plan allocations which are not being taken forward as allocations in the emerging *East Riding Local Plan*. Those existing allocations which are being taken forward as new allocations in the emerging *East Riding Local Plan* are considered suitable for development within five years. For the purposes of the 2013 SHLAA, these sites are considered as emerging *East Riding Local Plan* allocations.

- 3.11** Just over half of the existing undeveloped Local Plan allocations are not being taken forward as new allocations in the *Proposed Submission East Riding Local Plan*. Some of these sites will not be considered deliverable in the five year land supply where a significant constraint has been identified through the preparation of the emerging *East Riding Local Plan*.
- 3.12** The Council has also considered the deliverability of existing Local Plan allocations in the next five year period in light of the approach to development set out in the *Proposed Submission East Riding Local Plan* (policy S5). This policy states that for some settlements, no specific allocation for residential development will be made based on the current evidence regarding the level of flood risk/health and safety risk. The existing Local Plan allocations located in these settlements are excluded from the five year supply (see table 4 for the settlements affected).
- 3.13** The Council received support for the re-appraisal of existing Local Plan allocations from members of the working group as part of the formal methodology consultation.
- 3.14** Notwithstanding those existing allocations which will not be included in the five year supply as explained above, until the *East Riding Local Plan* is adopted (expected early 2015) the existing allocations in the four existing Local Plans continue to form part of the development plan which is the starting point for making decisions on planning applications. The vast majority of the existing allocations are therefore still considered acceptable in principle. Only those existing allocations located within or closely related to settlements within the *Proposed Submission Strategy Document* settlement network are considered for inclusion within the five year supply.
- 3.15** When the *East Riding Local Plan* is adopted, the existing allocations which remain undeveloped and without planning permission which are not being taken forward as new allocations in the emerging *East Riding Local Plan* will effectively be de-allocated and will no longer form part of development plan.

Emerging East Riding Local Plan Allocations

- *Sites identified as allocations in the emerging East Riding Local Plan without a planning permission that are yet to be developed.*
- 3.16** The draft national planning guidance accompanying the NPPF allows for the consideration of emerging sites as part of the overall supply. Under the question, 'What constitutes a 'deliverable' site' it states... " *if there are no significant constraints (e.g. 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*" (3-019-130729). 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 *Proposed Submission Local Plan Allocations Document*, 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.

- 3.17** The Council has considered the deliverability of emerging *Local Plan* allocations in the next five year period in light of the approach to development set out in the *Proposed Submission East Riding Local Plan*. Policy A1 of the *Proposed Submission East Riding Local Plan* identifies that housing allocations in Cottingham can only come forward following the completion of the Cottingham and Orchard Park Flood Alleviation Scheme (COPFAS), or if it has been demonstrated that acceptable solutions to the surface water flood risk issue can be implemented alongside new development. Policy A4 of the *Proposed Submission East Riding Local Plan* identifies that housing allocations in Goole (except those South of Dutch River) can only come forward once surface water drainage improvement schemes have been put into place, or it can be demonstrated that acceptable solutions to the surface water flood risk issue can be implemented alongside new development.
- 3.18** In light of the fact there are infrastructure constraints to overcome, a longer lead-in time has been applied to the emerging *Local Plan* allocations in Cottingham and Goole, based on the fact that the study on flood risk in Goole is not expected to be completed until April 2014 and COPFAS, by the end of 2015.

3. Windfall Allowance

- 3.19** The five year supply calculation also allows for dwellings projected to come forward on sites not specifically identified as allocations at this time, for example on vacant land.

The six to fifteen year supply

- 3.20** The 6-15 year supply consists of:
1. Dwellings from sites identified as allocations in the *Proposed Submission Local Plan 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 larger 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 larger sites; and
 3. Dwellings from sites identified as existing deliverable *Local Plan* allocations (or part thereof) 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 larger sites.

Potential supply

- 3.21** The potential supply is made up primarily of 'land bids'. These 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.
- 3.22** For clarity, the potential supply comprises of:
1. Sites not identified as allocations in the *Proposed Submission Local Plan Allocations Document* and without planning permission;
 2. Sites identified as existing Local Plan allocations located in areas outside the identified settlement network. These allocations are classed as 'non-hierarchy' allocations and do not form part of the five year supply; and
 3. Sites identified as existing Local Plan allocations but which are, at this time, subject to (a) constraint(s).
- 3.23** The assessment considers some of potential supply to be currently undevelopable. Sites that are considered currently undevelopable are affected by national policy restrictions (identified in para. 3.27 below), and/or are remote from the built form of a settlement in the settlement network. There may also be insurmountable constraint(s) affecting the development of the site.

Drawing up the sites

- 3.24** Before the assessment began, a decision was made on which sites were to be assessed in the SHLAA. Only those sites that were within or closely related to settlements recognised as being in the settlement network were included in the assessment (see table 4).
- 3.25** This approach also reflected the fact that initial assessments of supply indicated that the East Riding had an abundance of potential sites without significant constraints in and around the settlements listed in the network to meet a fifteen year housing supply. Therefore, there was no need to assess additional sites in other smaller settlements. This means that many sites submitted to the Council as land bids are not included in the SHLAA assessment. The only exception to this relates to sites with planning permission. These sites are included in the SHLAA regardless of where they are located.
- 3.26** In the majority of cases, land bids were assessed as they were submitted to the Council. In some instances, land bids were either joined or split up in order to produce realistic and tenable housing sites and to make sites easier and more practical to assess. This was particularly the case for large sites in smaller settlements where the prospect of such growth was considered to be unlikely and inappropriate in scale.

The Assessment

3.27 The SHLAA has been populated in a simplified manner that achieves the core outputs. Appendix B sets out the results of the individual site assessments. The sheer number of sites in the East Riding (which is one of the largest local authority areas in the country) meant that this was the only practical way to carry out the assessment in the given timescale. Based on the core outputs, the SHLAA was populated with the following fields:

- **SHLAA ID:** A unique ID for the site. This cross-references to the sites shown on the map in Appendix B.
- **Settlement hierarchy:** Where the settlement is placed in the *Proposed Submission Local Plan Settlement Network* (Table 4).
- **Allocations Document reference:** Where relevant, the site reference set out in the *Proposed Submission Local Plan Allocations Document* has been included for information.
- **Local Plan Sub Area:** Identifies which one of the six emerging Local Plan sub areas the site falls within.
- **Date of permission:** If relevant.
- **Reason considered:** Information showing what source the site came from, e.g. a land bid, housing allocation, etc.
- **Area:** Gross area of the site in hectares (ha).
- **Net developable area:** Area of site that can be developed purely for housing.
- **Density:** Differs according to where the site is located. In line with the approach set out in policy H4 of the *Proposed Submission Strategy Document*.
- **Net capacity:** The estimated number of dwellings that can be accommodated onto the net site area. This is calculated as net developable area multiplied by density. For planning permissions, this number represents the total number of dwellings given by the most recent permission on the site.
- **Capacity remaining:** In the case of sites with planning permission, this figure shows the remaining number of dwellings still to be complete if development has already started. This figure will be the same as net capacity for all other types of sites.

- **GF/PDL:** Whether the site is composed entirely of greenfield land, previously developed land, or a mix of both.
- **National policy restrictions:** National guidance states that only national policy designations should be considered when assessing whether a site is developable. Sites with these designations within their area are considered to be partially or wholly undevelopable. The following are relevant national policy designations:
 - Sites of Special Scientific Interest (SSSI)
 - Ramsar Sites, Special Protection Areas (SPA)
 - Special Areas of Conservation (SCA)
 - National Nature Reserves (NNR)
 - Scheduled Monuments, Ancient Woodlands
 - Health and Safety Executive Inner Zones
 - Flood Risk areas - Zone 3b 'Functional Floodplain'
- **Risk of flooding:** A significant issue for the East Riding, flooding has been kept separate from other physical constraints. The level of flood risk has been determined by the Council's Level 1 Strategic Flood Risk Assessment, (SFRA) (January 2010). The SFRA is a detailed assessment of flood risk 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.
- **Physical limitations:** Includes significant issues that would need to be overcome through the planning application process. These issues include: access to the site, neighbouring uses, proximity of waste water treatment works, contamination, topography and mineral designations, etc.
- **Ownership details:** Details of the owner/s and/or representative/s of the site where known.
- **Can availability and suitability constraints be overcome?** A range of possible solutions for any availability or suitability constraints.

- **Overall deliverability:** Based on the suitability, availability and achievability of the site, a timeframe of deliverability can be given. If a site is currently suitable, available and achievable it will be placed into the five year supply. A site that has outstanding issues to be resolved is placed in the 'potential' supply.
- **Deliverability in years:** The number of dwellings that can **theoretically** be built in the plan period will be shown here. The development of some sites will run over different time periods.

Calculating Density

- 3.28** The draft national practice guidance (ID 3-017-130729) looks to emerging planning policy to identify the development potential of each site with regards to density assumptions. It states that ..."*estimating the development potential of each identified site should be guided by existing or emerging plan policy including locally determined policies on density*". In light of this guidance and the feedback from members of the working groups, policy H4 of the *Proposed Submission Local Plan Strategy Document* will be applied to all the sites without a current planning permission. The Council received support for this approach from members of the working group as part of the formal methodology consultation.
- 3.29** Policy H4 identifies a minimum residential density requirement of 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 will be 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 will be applied.
- 3.30** It was agreed that the density assumptions will be used as a broad-brush approach.

Calculating Developable areas

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

- Major distributor roads
- Community facilities (such as a new school or health centre)
- Open spaces serving a wider area
- Significant landscape buffer strips
- Space for water storage in areas of high flood risk
- Areas comprising non housing uses, such as a green infrastructure corridor
- An existing on-site constraint, such as the need to maintain an important landscape or wildlife area.

3.34 A range of assumptions are set out in Table 5 (below). These are based on an updated analysis of completed and proposed developments applying the above definition of net developable area. The assumptions are useful in that they indicate the expected capacity of housing sites included within the assessment. These assumptions do not apply to sites with planning permission where the number of units is already specified. For example, it can be expected that for sites over 5 hectares, 75% of the available land would be occupied by housing.

3.35 Evidence suggests it is reasonable to assume 100% of the area of small sites could potentially be developed for housing because smaller sites are likely to utilise existing infrastructure and facilities. A proposal for 5 dwellings, for example, is very unlikely to include a major distributor road, school, significant open space or landscaping buffer. This approach was supported by members of the working groups.

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 to 10.0	75

3.36 It was agreed that developable area assumptions should be used in a broad-brush manner.

Pre-build lead-in times

3.37 This is the lead-in time from the point of approval of a planning application to the start of development. It was agreed with the core working group that the larger the site, the longer the timeframe required in pre-application and application periods and to negotiate section 106 agreements, etc.

3.38 A number of the sites identified as allocations in the *Proposed Submission East Riding Local Plan* require the preparation of a development brief. The core working group acknowledged that pre-application discussions in relation to these sites would inevitably reduce their pre-build lead in times. The pre-build timescales applied to the sites are shown in Table 6 (below).

Table 6 - Pre-build lead-in times

	Fewer than 50 plots	More than 50 plots
Outline planning permission	10 months	24 months
Reserved matters/full planning permission	12 months	18 months
Existing and emerging allocations without planning permission and all other potential sites	18 months	30 months

3.39 An exception to the above assumptions will be made for sites located in Cottingham and Goole. Policy A1 of the *Proposed Submission East Riding Local Plan* identifies that housing allocations in Cottingham can only come forward following the completion of the Cottingham and Orchard Park Flood Alleviation Scheme (COPFAS), or if it has been demonstrated that acceptable solutions to the surface water flood risk issue can be implemented alongside new development. Policy A4 identifies that housing allocations in Goole (except those South of Dutch River) can only come forward once surface water drainage improvement schemes have been put into place, or it can be demonstrated that acceptable solutions to the surface water flood risk issue can be implemented alongside new development. In light of the fact there are infrastructure constraints to overcome, the following extended lead-in times have been applied to sites without planning permission in Cottingham and Goole:

- Fewer than 50 plots - 30 months
- More than 50 plots - 42 months

3.40 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 a broad-brush approach.

Build rates for large sites

3.41 This is an estimate of how many dwellings can be built on a site in a year. Build rates are affected by factors such as the strength of the housing market in the area; the availability of finance; the number of developers on a site; and their capacity to build out the site. The assumed rates are shown in table 7 (overleaf):

Table 7 - Annual build rates

Size of site	2013-14 (interim rate)	2014-15 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	70
400 or more units (assuming 3 developers)	80	105
400 or more units (assuming 4 developers)	107	140

3.42 The build rates start off at a reduced rate to reflect the current state of the market and return to normal levels by 2014-15.

3.43 Given that a significant number of the emerging allocations in the *Proposed Submission Local Plan* are of 400 or more units, it is considered appropriate to provide a separate build rate for those sites likely to be built out by 4 developers.

3.44 Information received from members of the working group representing national house builders suggested it was reasonable to consider a build rate of between 30 to 35 dwellings per developer per year. Neighbouring authorities also reported applying rates of 40-60 dwellings per developer per year, supporting the assumptions noted above.

Calculating a windfall allowance

3.45 A windfall site is a site not specifically identified as available at the time of the assessment.

Table 8 - Windfall completions in the East Riding

	Windfalls completed	Gross completions	Windfalls completed as a percentage of annual gross completions (%)
2008-09	667	786	85
2009-10	367	499	74

	Windfalls completed	Gross completions	Windfalls completed as a percentage of annual gross completions (%)
2010-11	404	548	74
2011-12	587	962	61
2012-13	740	997	74
Total	2,765	3,792	73

3.46 Table 8 (above) shows that over the last five years windfall completions have consistently formed over half of the gross completions in the East Riding. Of the 3,792 gross completions in the last five years, 2,765 (or 73%) have been on windfall sites. They have continued to come forward even in more recent times. This is considered compelling evidence that windfall sites have consistently become available and that a windfall allowance can be included in the five year supply ⁽⁴⁾.

3.47 The windfall allowance does not include dwellings likely to be built on garden land as the NPPF (Paragraph 48) states that any windfall allowance should not include residential gardens. The decision to make an allowance for garden land in the windfall allowance was supported by the working groups.

3.48 As Table 9 (below) shows that the annual average number of dwellings granted permission on windfall sites in the East Riding over the last five years was **477** dwellings.

Table 9 - Windfall permissions in the East Riding

	Windfalls granted planning permission
2008-09	335
2009-10	211
2010-11	624
2011-12	532
2012-13	684
Average	477

3.49 Historic completion rates (based on the last five years of windfall site completions) indicate that, of the windfall sites granted permission in the last five years, on average between 41-85% were completed by year 5 of their planning permission. The rates of implementation vary by sub area.

⁴ Sites identified as proposed allocations in the *Proposed Submission East Riding Local Plan Allocations Document* which obtain planning permission before the adoption of the *Local Plan* are technically counted as 'windfall' sites. However, no additional allowance has been made for these sites in windfall calculations.

3.50 The historic completions rates were used to project the windfall allowance expected to come forward in the East Riding over the next five years. The results are shown in Table 10 (below).

Table 10 - Calculating the windfall allowance

Year	Average number of permissions anticipated	Dwellings complete by (cumulative):				
		Year 1	Year 2	Year 3	Year 4	Year 5
2013-14	477	29	90	198	283	328
2014-15	477		29	90	198	283
2015-16	477			29	90	198
2016-17	477				29	90
2017-18	477					29
Total						928

- The total number of dwellings that can be expected to be completed on windfall sites across the East Riding over the next five years (**928**)
- A reduction was then made for the number of windfall dwellings likely to be built on garden land each year. Based on historical evidence of previous windfall completions this reduction was 15%. This avoids the inclusion of garden land in the five year supply.
- This allows for the number of dwellings expected to be completed on windfall sites across the East Riding over the next five years to be determined (**928 x 0.85**).
- The number of dwellings that can reasonably be expected to be completed on windfall sites across the East Riding over the next five years is **789**.

3.51 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. The new policy approach set out in the emerging *East Riding Local Plan* is much more supportive of infill development in villages and development limits have been revised to allow for infill opportunities to come forward.

3.52 The 2012 SHLAA provided a windfall allowance based on the forecast that an average of 693 new plots would be approved over the subsequent five year period. Table 9 shows that 684 new windfall plots were approved in 2012/13. Although this figure is slightly lower than anticipated, it provides confirmation that such opportunities continue to come forward. The annual nature of the SHLAA ensures that windfall assumptions respond to the latest evidence (e.g. this year's allowance has been reduced).

Large Sites Non-Implementation Discount

3.53 Considering the non-implementation of planning permissions is an important factor when calculating housing supply. Whilst the 20% 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.

3.54 The number of plots approved over the last twelve years and the year they were built has been considered. The number of dwellings built after five years of being in the supply has fallen in recent years. At the peak of the market, implementation rates were around 90% after five years of being in the supply. As an average over the last five years, implementation rates by year five have been 72%, falling very slightly from the previous year's SHLAA, when implementation rates by year five were recorded as 74%.

3.55 Based on the above evidence, the following non- implementation rates, will be applied to large sites with planning permission:

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

3.56 The discount rates will be applied annually to the supply.

Small Sites Non-Implementation Discount

3.57 The number of small sites approved over the last five years and the year they were built has been considered. As an average over the last five years, implementation rates of small sites by year 5 have been 64%. This non-implementation rate (36%) has been applied to the number of small sites with a current planning permission.

4 Assessment Findings

Introduction

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

Step 1: Identifying the five year (existing) supply

Assessing the total number of plots with planning permission, broken into small and large sites, as well as assessing the total number of plots from existing deliverable Local Plan allocations (undeveloped, without planning permission), and emerging *East Riding Local Plan* allocations.

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

Applying the methodology (set out in chapter 3), the existing supply is projected across the plan period. Using this information a more detailed assessment of the five year supply can be prepared.

Step 3: Assessing the six to fifteen and potential supply

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

Step 4: Identifying any potential for broad locations

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

Step 1 - Identifying the five year (existing supply)

Existing planning permissions

Large sites

4.2 The remaining dwelling capacity of large sites with planning permission is 2,357. Due to the projected 20% non-implementation of permissions, as well as considering build rates, it is anticipated that 1,886 of these could be built out in the next five years, leaving little coverage in the 6-15 year supply period.

Small sites

- 4.3** The total number of plots on small sites with permission in the East Riding as of 1 April 2012 is 825. Due to the projected 36% non-implementation of small site permissions, it is anticipated that 528 of these could be built out in the next five years.
- 4.4** The combined total of dwellings from all sites (large and small) with a current planning permission is 3,182. The number of these that can be built in the first five years (after applying the non-implementation assumptions) is 2,414, 76% of the total number with permission.

Housing Allocations

Existing Deliverable Local Plan Housing Allocations

- 4.5** There are 60 undeveloped existing housing allocations from the four existing Local Plans without a planning permission that are yet to be developed (in locations within or closely related to settlements in the settlement network). 26 of the 60 are being taken forward as allocations through the *Proposed Submission East Riding Local Plan* and are considered deliverable in the next five year supply period. These are considered under the heading 'emerging *Local Plan* housing allocations' (below).
- 4.6** The remaining 34 existing Local Plan allocations are not proposed to be taken forward as allocations through the *Proposed Submission East Riding Local Plan*. These sites have been re-appraised to determine whether a significant constraint has been identified through the preparation of the *East Riding Local Plan* indicating the site may no longer be deliverable in the next five year period.
- 4.7** This re-appraisal process has identified that the following 6 allocations (or part thereof) should be excluded from the five year supply because a significant constraint has been brought to the Council's attention:
- PRN1a (Preston) - Majority of the site is not available. This area would form the suitable access for the site.
 - Part of S6b (Bubwith) - Site does not appear to have a suitable connection to the public highway.
 - Part of HRN1d (Hornsea) - Site is affected by coastal erosion.
 - Part of Mark7 (Market Weighton) - Part of the site is required for the Mill Beck Reservoir Scheme (12/02790/STPLF)
 - Part of Mark10 (Market Weighton) - Site currently in use as allotments. No residential land bid on the site.
 - Part of SK2 (Skirlaugh) - Playing fields have not been relocated.

- 4.8** The existing Local Plan allocations located in settlements where the *Proposed Submission East Riding Local Plan* does not identify specific sites for allocation have also been re-appraised in light of deliverability within the next five year supply period. This process resulted in the following 13 existing allocations (undeveloped without planning permission) being excluded from the five year supply (either the entire allocation, or in some cases, the remaining undeveloped part of the existing allocation) because they are either in locations that the *Proposed Submission East Riding Local Plan* does not support the identification of specific sites for allocation at this moment in time or they are located in Flood Zone 3a:
- Easington - EAS1a, EAS1b
 - Gilberdyke - S15c, S15d
 - Hedon - HED1f, HED8
 - Keyingham - KEY3, KEY2
 - Leven - H1ek
 - Newport - S25a, S25b, S25e
 - Rawcliffe - S30b
- 4.9** In addition to the above considerations, the remaining existing Local Plan allocations in Goole have had a longer lead-in time applied to them (30 or 42 months) based on the approach to development in Goole set out in the *Proposed Submission Local Plan* (as outlined in paragraph 3.39).
- 4.10** In summary, there are 60 undeveloped existing housing allocations identified in the four Local Plans (in locations within or closely related to settlements in the settlement network). 19 existing allocations (or part thereof) are not included in the five year supply because either a) a constraint has been identified indicating the site will not come forward within five years b) the site is located in a settlement where the *Proposed Submission East Riding Local Plan* does not support the identification of specific sites for allocation at this moment in time or c) the site is located in Flood Zone 3a. 47 existing allocations (or part thereof) are still considered deliverable in the next five year period (these contribute 612 dwellings towards five year supply).
- 4.11** There are also 16 existing allocations (or part thereof) located in areas outside the settlement network. These allocations are classed as 'non-hierarchy' allocations and do not form part of the five year supply.

Emerging Local Plan Housing Allocations

- 4.12** 11,156 dwellings could be provided on emerging *East Riding Local Plan* allocations without a current planning permission in the first five years. The Council is satisfied that the vast majority of the allocations in the *Proposed Submission East Riding Local Plan* are deliverable in the first five years and can contribute to the supply of housing land. This is evidenced by the fact that proposals have already been submitted on emerging allocations since the publication of the *Draft Allocations Document* and that they are being supported by the Council. This figure has regard to the specific delivery issues in Cottingham and Goole as outlined in paragraph 3.17.

Windfall Allowance

- 4.13** A windfall allowance of 789 has been included in the five year supply. This is equivalent to 0.4 years of supply and does not include garden land.

The Five Year Supply

- 4.14** Table 11 (below) shows the five year supply position. The total five year existing supply is 14,971. **Comparing this figure to the five year requirement of 10,240 (outlined in chapter 1) means that the East Riding as a whole has a 7.3 year supply of deliverable housing sites.**
- 4.15** All the sub areas deliver more than five years worth of housing land supply. The Holderness and Southern Coastal and Vale of York sub areas each deliver over 9 years worth of housing land supply.
- 4.16** The Hull Housing Market Area (HHMA) has a total five year existing supply of 6,908. The *Proposed Submission Local Plan Strategy Document* (Policy S5) requires approximately 45% of the total housing provision in the East Riding to be located in the East Riding part of the HHMA, meaning that the five year net residual housing requirement for the HHMA is 4,730. Using these figures it can be calculated that the HHMA has a 7.3 year supply.

Table 11 - Five year supply position

	Beverley & Central	Bridlington & Coastal	Driffield & Wolds	Goole & Humberhead Levels	Holderness & Southern Coastal	Vale of York	Total East Riding
Planning permissions (large sites)	633	152	418	256	243	183	1,886
Planning permissions (small sites)	149	109	64	73	58	75	528
Existing Deliverable Local Plan Allocations	191	0	118	164	88	51	612
Emerging Local Plan Allocations	4,326	1,678	1,291	1,118	907	1,835	11,156
Windfall allowance	245	116	81	106	68	173	789
Total five year existing supply	5,544	2,055	1,972	1,717	1,364	2,317	14,971
Annual residual requirement (including 20% buffer and backlog)	803	309	263	275	143	255	2,048
Five year net residual requirement (including 20% buffer and backlog)	4,015	1,545	1,315	1,375	715	1,275	10,240
5 year supply position	6.9	6.7	7.5	6.2	9.5	9.1	7.3
Please note - figures may not total due to rounding.							

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

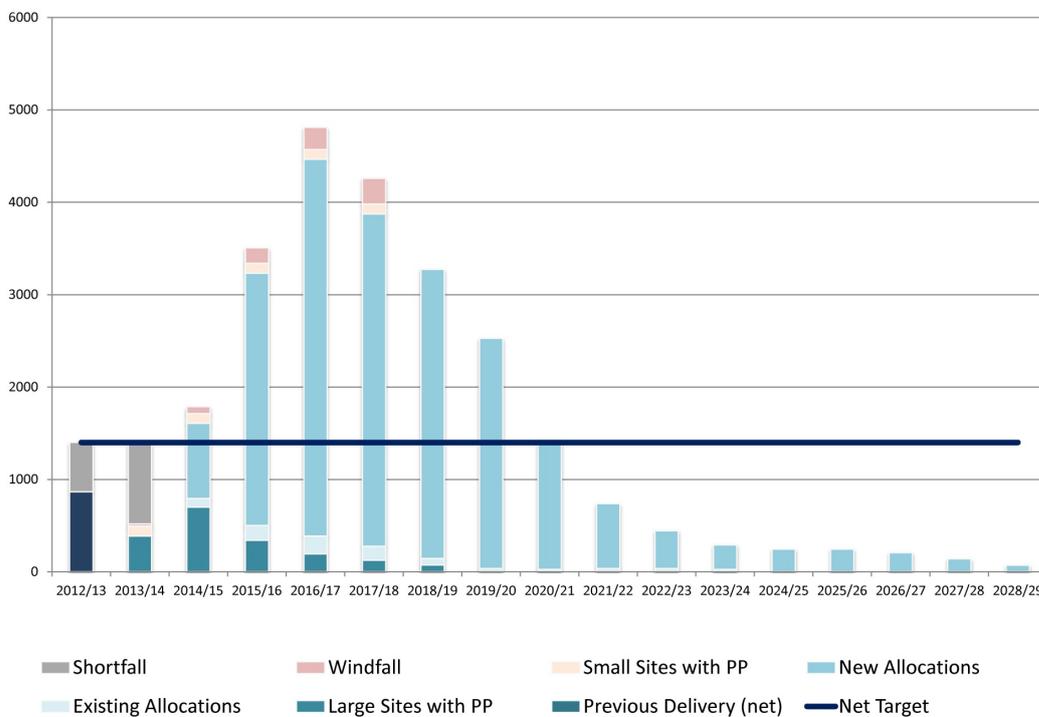
4.17 The housing trajectory below projects the existing supply to 2028/2029 applying the methodology. The windfall allowance is also included within the next five years of the plan period. It is important to note that the trajectories are based purely on existing supply and do not include assumptions about potential supply. Potential supply is considered further through Step 3.

4.18 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. It is important to note that a 20% non-implementation discount has been applied to the existing supply in the next five years of the plan period and a 10% discount thereafter. These are rolling trajectories. New sites will be granted permission which will add to the supply as existing sites are built out.

East Riding Trajectory

4.19 The trajectory (below) shows the five year supply against the residual housing requirement to 2028/29. The supply of housing from new allocations identified in the emerging *East Riding Local Plan* is also shown.

Figure 2 East Riding Housing Trajectory



Step 3 – Assessing the six to fifteen year and potential supply

Assessment of six to fifteen year supply

4.20 The 6-15 year supply consists of:

1. Dwellings from sites identified as allocations in the *Proposed Submission Local Plan 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 larger 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 larger sites; and
3. Dwellings from sites identified as existing deliverable Local Plan allocations (or part thereof) 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 larger sites.

4.21 With regards to the first source of 6-15 year supply, there are 159 sites identified as allocations in the *Proposed Submission Local Plan Allocations Document*. Applying the assumptions detailed in chapter 3, means that 9,271 dwellings from these sites will be built out in years 6-15.

4.22 With regards to the second source of 6-15 year supply, there are 128 sites with a current planning permission. Applying the assumptions detailed in chapter 3, means that 96 dwellings from these sites will be built out in years 6-15.

4.23 With regards to the third source of 6-15 year supply. Applying the assumptions detailed in chapter 3, means that 150 dwellings from existing Local Plan allocations (or part thereof) will be built out in years 6-15.

Table 12 - Six to fifteen year supply position

	6-15 years
Planning permissions (large sites)	96
Planning permissions (small sites)	0
Existing deliverable Local Plan Allocations	150
Emerging Local Plan Allocations	9,271
Windfall allowance	N/A
Total	9,517

Assessment of Potential Supply

4.24 The potential supply comprises of:

1. Sites not identified as allocations in the *Proposed Submission Local Plan Allocations Document* and without planning permission;
2. Sites identified as existing Local Plan allocations located in areas outside the settlement network. These allocations are classed as 'non-hierarchy' allocations and do not form part of the five year supply; and
3. Sites identified as existing Local Plan allocations but which are, at this time, subject to (a) constraint(s).

4.25 With regards to the first source of potential supply, there are 578 sites not identified as allocations in the *Proposed Submission Local Plan Allocations Document*. These sites have a total capacity of 71,830 dwellings (some of which are considered currently undevelopable).

4.26 With regards to the second source of potential supply, 16 'non-hierarchy' allocations (or part thereof) are considered currently undevelopable as they are remote from the built form of a settlement in the settlement network. These sites have a total capacity of 475 dwellings.

4.27 With regards to the third source of potential supply, there are 19 existing Local Plan allocations (or part thereof) which are not included in the five year supply because they are, at this time, subject to (a) constraint(s). These sites have a total capacity of 1,278 dwellings.

4.28 In summary, this means 73,583 dwellings form the potential supply. 38,821 of these are considered developable (a theoretical 19 year supply of developable sites). 34,818 dwellings are considered currently undevelopable because they are affected by national policy restrictions (identified in para. 3.27), and/or are remote from the built form of a settlement in the settlement network. There may also be insurmountable constraint(s) affecting the development of the site.

Table 13 - Potential Supply Position

Sites not identified as emerging allocations	71, 830
Non - hierarchy allocations	475
Existing currently constrained Local Plan Allocations	1,278
Total potential supply	73,583
Developable Potential Supply	34,762
Currently Undevelopable Potential Supply	38,821

Step 4 - Broad Locations

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

5 Summary and Conclusions

- 5.1** The SHLAA has identified 918 sites in total. After non-implementation has been accounted for, 2,414 dwellings could be provided on sites that currently have permission (both large and small sites) in the first five years.
- 5.2** 612 dwellings could be provided on existing Local Plan allocations without a current planning permission in the first five years. Until the *East Riding Local Plan* is adopted (expected early 2015) these allocations continue to form part of the development plan. Only those existing allocations located in or closely related to settlements within the *Proposed Submission Strategy Document* settlement network were considered for inclusion within the five year supply.
- 5.3** 19 existing Local Plan allocations have been excluded from the five year supply where either a) a significant constraint has been identified through the preparation of the *East Riding Local Plan* b) they are located in settlements where the *Proposed Submission East Riding Local Plan* does not support the identification of specific sites for allocation at this moment in time or c) they are located within Flood Zone 3a. These sites cannot reasonably be considered as deliverable within the first five years.
- 5.4** 11,156 dwellings could be provided on emerging *Local Plan* allocations without a current planning permission in the first five years.
- 5.5** A windfall allowance of 789 dwellings has also been included within the five year land supply.
- 5.6** 73,583 dwellings form the potential supply. 34,762 of these are developable. 38,821 are considered currently undevelopable.
- 5.7** The number of dwellings that can be delivered in the first five years (the existing supply) is 14,971. Comparing this figure to the five year residual requirement of 10,240 (including the additional 20% buffer) means, that the East Riding as a whole has a **7.3 year supply of deliverable housing sites**. The five year (existing supply) comprises sites with planning permission, existing Local Plan allocations, emerging *Publication Local Plan* allocations and a windfall allowance.
- 5.8** All sub areas have over 5 years worth of housing land supply.
- 5.9** The SHLAA has shown there is an abundance of sites that are, in theory, suitable, available and achievable over the plan period across all sub areas. Therefore, there is no need to identify any new broad locations of growth within the East Riding.

Keeping the Assessment up to date

- 5.10** The SHLAA will be monitored and updated on an annual basis. The next update of the SHLAA will consider issues such as:

- What sites with planning permission are under construction and what progress has been made.
- What planning applications have been submitted or approved on sites identified in the assessment.
- Whether sites in the assessment are subject to preliminary negotiations or have been deferred to planning committee for delegated approval.
- What unforeseen constraints have emerged which means a site is no longer deliverable.
- Whether progress has been made in removing constraints to development and whether a site is now considered deliverable.
- Whether the windfall allowance remains a realistic and reliable source of supply.
- Changing national policy context
- The continued role and effective involvement of the working groups

Appendix A

SHLAA Working Groups 2013

Core Working Group Members

- A forward planning officer from Hull City Council who is involved in the production of the Hull SHLAA;
- A planning officer from the Development Management Section of East Riding of Yorkshire Council;
- Professionals representing national house builders (Linden Homes, Turley Associates, Barton Willmore); and
- Professionals representing local house builders (Risby Homes, Scruton Homes, Peter Ward Homes).

Wider Working Group Members

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

Appendix B

SHLAA Site Assessments and Maps

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

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

If English is not your first language and you would like a translation of this document into any other language, please telephone (01482) 393939.