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Sent: 15 August 2025 19:50
To: localplan@york.gov.uk
Cc: Tim Ross
Subject: City of Yorks CIL statement of modifications Consultation - Representations on Behalf of Galtres Garden Village Development Company
Attachments: 150725 GGVDC CIL Mods reps.pdf; APPENDIX 2 Council Housing Trajectory with Oneill Associates Adjustments.pdf; Housing_monitoring_update_june_2025.pdf
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Dear sir/ madam,

Please find the attached representations on behalf of Galtres Garden Village Development Company in response to the Council's CIL Statement of Modifications Consultation

Attached submission includes:

- 1) Representation prepared by O'Neill Associates
- 2) Appendix 2 to the representations
- 3) Annual Housing Monitoring and Supply Update June2025

Contact details set out below and within the submission.

Kind regards

Eamonn

O'Neill Associates

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City of York Council
CIL Statement of Modifications Consultation
15 July 2025

Response on behalf of Galtres Garden Village Development Company

INTRODUCTION

- i. These representations are made on behalf of Galtres Garden Village Development Company (GGVDC) in response to:
 - a. the consultation on the Statement of Modifications, Revised draft CIL Charging Schedule, and City of York CIL Viability Study Addendum (June 2025) by Porter Planning Economics
 - b. they should be read in conjunction with previous representations made on behalf of GGVDC response to the City of York Community Infrastructure Levy (CIL) Consultation March 2023.
 - ii. ***GGVDC requests to be heard at the examination of the City of York's CIL Charging Schedule, as an independent stakeholder organisation, and to be notified by the Council/ programme coordinator of all future events and proceedings. The notification should be provided to O'Neill Associates.***
 - iii. The CIL is proposed at a time of considerable uncertainty in terms of both the economy, and on-going changes to the planning system. In particular, the introduction of such a high CIL rate runs counter to the Governments intention of boosting housing development to achieve 1.5 million new homes by 2030.
 - iv. These representations are concerned primarily with the proposed modification to the "Residential Dwellings within York". The proposed £150/m² flat residential CIL rate - excluding certain strategic allocation sites - would be the highest in Yorkshire. By contrast, other authorities adopt zone-based rates to reflect local market values:
 - Leeds: £7.55, £34.72, £67.93, or £135/m² (index-linked)
 - Sheffield: £0, £46.18, £76.97, or £123.15/m² (index-linked)
 - v. York's blanket rate ignores value variation and disproportionately impacts lower-value areas, as well as sites with significant development constraints/ risk requiring costly
-

mitigation. It also constrains potential windfalls on Green Belt Sites – a particular issue in York where all land outside settlements is designated Green Belt.

- vi. The Council has failed to consider the effect of the proposed CIL charging schedule of potential Grey Belt sites, which national policy recognises as an important source of housing land. York is likely to depend on these sites to meet both overall housing and affordable housing targets. However, many Grey Belt sites delivering family housing with high affordable content also face substantial S106 education contributions - driven by child yield assumptions—which can vary significantly in scale.
- vii. When these S106 obligations are combined with a £150/m² CIL rate, the result is a serious threat to scheme viability, particularly for the very developments the Local Plan seeks to promote.
- viii. This runs counter to the NPPF requirement to significantly boost housing supply. York is already falling far short of its Local Plan housing targets after more than a decade of undersupply. A charging schedule that imposes the highest rate in the region, without sensitivity-testing realistic policy and s106 contribution scenarios, risks suppressing both market and affordable housing delivery—undermining the objectives of the adopted Local Plan and the *One City, for All* Council Plan (2023–2027).
- ix. Of particular relevance to the CIL debate is that windfall sites are an important component of the Councils housing land supply. In evidence to the Local Plan Examination¹ the Council included a windfall allowance of 198 dwellings per annum within their housing supply. This represents 24.2% of the local plan requirement of 822 dwellings per annum and highlights the importance of windfall development to the housing supply pipeline in York.

Local plan targets

- x. The adopted Local Plan 2025 spans the period 2017/18 to 2032/33 - a 16-year framework for delivery. Policy SS1 commits York to a minimum average annual net provision of 822 dwellings, ensuring at least 13,152 new homes by 2032/33. Crucially, it also requires that at least 45% of the city's identified need for 9,396 affordable dwellings is met during the plan period. This equates to 4,228 affordable homes, or an average of 264 per year.

Housing delivery

- xi. The Council's *Annual Housing Monitoring Update* (July 2025) shows that by the local plan's halfway point, only 5,740 dwellings had been delivered — 836 short of the number needed to be on track.
- xii. Table 2.9 below from the *Councils Annual Housing Monitoring Update 2025*, indicates that, at face value, the Council met the Local Plan housing requirement in only 6 of the first 8 years

¹ Housing Land Supply Update Addendum EX/CYC/76 Response to representations June 2022

of the plan. However, in the two years where the Local Plan requirement was exceeded, 2017/18 and 2022/23, PBSA completions contributed 637 and 232 units respectively. When these are excluded, it is evident that there has been a dramatic failure in the delivery of C3 housing in the first 8 years of the 16-year plan period.

Below - Extract from the Council's Annual Housing Monitoring Update (July 2025)

Table 2.9: Summary of data between 1 April 2015 to 31 March 2025

Year	Completions	New Build	Net Conversions/ COU	Net Conversions	Net Change of Use	Demolitions	Net Dwelling Gain	Communal Establishments	Overall net gain in Local Plan period
2015-2016	1171	908	219	1	218	6	1121		
2016-2017	996	420	564	21	543	7	977		
2017-2018	1336	1111	195	12	183	10	1296	35	1331
2018-2019	481	299	155	18	137	5	449	2	451
2019-2020	596	437	134	11	123	11	560	67	627
2020-2021	643	469	159	14	145	6	622	21	643
2021-2022	419	350	58	18	40	6	402	258	660
2022-2023	494	411	55	1	54	7	459	392	851
2023-2024	569	390	146	3	143	8	528	-63	465
2024-2025	675	395	262	4	258	8	649	63	712
Local Plan delivery 2017-2025	5213	3862	1164	81	1083	61	4965	775	5740
10 year delivery 2015-2025	7380	5190	1947	103	1844	74	7063		

- xiii. The Council has fallen short of its local plan targets for housing delivery for many years which, as a direct result of the draft CIL Charging Schedule, is likely to worsen rather than address the existing backlog.
- xiv. The *Annual Housing Monitoring Update & Five Year Housing Supply Position Monitoring Year 2024/25* includes a Housing Trajectory which the Council maintain indicates a five-year land supply of 5.7 years. We dispute that figure. Without wishing to get into a protracted debate on five-year land supply, our analysis (Appendices 1 and 2)), indicates with that even with some relatively minor adjustments on land supply based on reasonable assumptions regarding delivery, the five-year supply is 4.82 years. (We also include a copy of the Councils *Annual Housing Monitoring Update & Five Year Housing Supply Position Monitoring Year 2024/25* with these representations.)
- xv. What our analysis demonstrates is that delivery on the major strategic sites allocated in the Local Plan, which are exempt from CIL, has stalled. Housing delivery in the immediate future will increasingly be dependent on windfall sites (of all sizes) that will be subject to the £150 CIL rate.

- xvi. The proposed rate of £150 would seriously undermine the deliverability of the emerging local plan, particularly with regards to residential completions, PBSA completions, delivery of affordable PBSA and housing, new open space delivery, and brownfield first principles, amongst others.

Affordable Housing delivery

- xvii. The Council's *Annual Housing Monitoring Update* (July 2025) paints a stark picture: every year since the local plan period began, affordable housing delivery has fallen well short of the adopted local plan target. By the plan's halfway point, only 993 affordable dwellings had been delivered — less than half of the 2,114 needed to be on track. At the current pace, York will deliver just 1,986 affordable homes by 2032/33 — meeting only 21% of the identified need, and missing the Local Plan's affordability commitment by a wide margin. This shortfall risks deepening the city's housing crisis, leaving thousands of residents without access to the secure, affordable homes they need.

Below - Extract from the Council's Annual Housing Monitoring Update (July 2025)

Affordable housing completions

- 2.19 During the course of the monitoring year, 129 affordable homes were completed. Over the duration of the plan period so far (2017-2025) a total of 993 affordable dwellings have been completed.
- 2.20 The housing mix in relation to delivery over the last year and over the monitoring period mirror each other with the majority of completions shown to be 1/2 bedroom flats followed by 2/3 bedroom houses¹⁰.

Table 2.12: Affordable Housing Completions – Housing Mix

Year	1-bed flat	2-bed flat	1-bed house	2-bed house	3-bed house	4-bed house	Total
2017/18	25	32	0	6	10	1	74
2018/19	5	24	2	14	15	0	60
2019/20	31	47	5	18	16	7	124
2020/21	41	27	6	29	22	5	130
2021/22	68	57	0	40	44	10	219
2022/23	38	0	0	32	42	9	121
2023/24	11	26	0	61	33	5	136
2024/25	37	34	0	26	27	5	129
Total 2017-2025	256	247	13	226	209	42	993
% split for 2024/25	29%	26%	0	20%	21%	4	100%
% split over 2017-2025	26%	25%	1%	23%	21%	4%	100%

¹⁰ "Houses" includes a small number of bungalows.

- x. In practical terms what this means is that where a residential scheme liable for CIL has higher development costs that affect viability, and given that CIL is non-negotiable, it is the section 106 requirements such as affordable housing, that will be negotiated down. Delivery of affordable housing is a key objective of the adopted Local Plan and 'One City for all: Council Plan' which will be severely threatened by the introduction of the draft CIL Charging Schedule.

- xi. The potential impact of the CIL on affordable housing delivery is particularly relevant to the GGVDC. The company's proposal for a new Garden Village includes affordable housing provision at 40% - higher than the maximum level of 30% set out in Policy H10 of the Draft Plan. The residential CIL rate of £150 would severely impact on the delivery of this level of affordable housing or would impact on the viability of the scheme, or both.

Green Belt/ Grey Belt

- xii. As outlined above York has suffered from persistent under delivery of housing in the first 8 years of the Local Plan - and before. All land outside settlements is Green Belt. While strategic Local Plan allocations will, at some point in the future, deliver significant housing, in the short to medium term, windfall sites will be an important component of supply. Larger windfall sites are likely to come forward on Green Belt sites, either as grey belt opportunities or through VSC's.
- xiii. Under the NPPF "Golden Rules" the affordable housing requirement on such site will be 15% above the stated Local Plan affordable requirement, or in the absence of an affordable housing policy, 50%. The CIL Viability Study had not taken account of this scenario and the potential adverse impact of the proposed £150 rate on such sites. The Council should therefore consider the implications of the £150 charge on the delivery of such sites having regard to the higher affordable provision.

Section 106 Contributions

- xiv. Current S106 education contributions—driven by high child yield assumptions—are highly variable (as shown in the table extract below) and, when combined with a £150/m² CIL rate, risk making family and affordable housing schemes unviable.
- xv. The CIL evidence base must sensitivity-test realistic education contribution scenarios to avoid a charging schedule that inadvertently blocks the very schemes the Local Plan seeks to deliver.

Below – Extract from City of York CIL Viability Study Addendum (June 2025) by Porter Planning Economics.

Table 4.13 Policy DM1/s106 costs per unit tested in this Addendum

Site	S106	Supplementary Education	Other key Infrastructure	Total cost	Cost per unit
Not Strategic Site specifics	£3,208,800	£3,112,461	£0	£6,321,261	£8,274
SS8 Land Adj Hull Road (ST4)	£886,200	£1,054,611	£1,000,000	£3,419,116	£13,000
SS9 Land East of Metcalf Lane (ST7)	£3,549,000	£9,992,240	£2,500,000	£16,041,240	£18,984
SS10 Land Nth of Monks Cross (ST8)	£4,065,600	£15,274,420	£3,000,000	£22,340,020	£23,079
SS11 Land Nth of Haxby (ST9)	£3,087,000	£12,955,738	£2,000,000	£18,042,738	£24,548
SS12 Land West of Wigginton Rd (ST14)	£5,661,600	£21,568,055	£11,900,000	£39,129,655	£29,028
SS13 Land West of Elvington Lane (ST15)	£14,023,800	£52,300,000	£74,900,000	£141,233,800	£42,295
SS14 Terry's Extension Sites (ST16)	£466,200	£0	£0	£466,200	£4,200
SS16 Land at Tadcaster Rd (ST21)	£663,600	£1,210,685	£0	£1,874,285	£11,863
SS18 Station Yard, Wheldrake (ST33)	£630,000	£1,777,059	£0	£2,407,059	£16,047
SS20 Imphal Barracks (ST36)	£3,229,800	£9,093,293	£0	£12,323,093	£16,025

Source: CYC, Key Infrastructure Requirements Updated Gantt [Exam doc: EX/CYC/70]

- xvi. The lack of sensitivity testing, particularly for potential green/grey belt sites is highly concerning and undermines the robustness of the evidence base to justify such a high CIL rate compared to other areas in the Yorkshire region. It is essential that the CIL rates are set at a level which ensures that most developments remain robustly viable over time as development costs change – most likely upwards. As such CIL rates should not be set at a marginal viability point. It is vital for the Council to build in a significant degree of flexibility to ensure durability of the CIL charging schedule.
- xvii. The reality and specific context of developing in York have not been properly considered. This is particularly pertinent within the context of a brownfield first context which is the thrust of the recent national policy statements, and the Local Plan spatial strategy. The majority of the city centre is located within an area of archaeological importance, and historic core conservation area. Both of these designations, and associated local plan policies increase development costs and have significant viability implications which are overlooked.
- xviii. Securing the long- term future of York's heritage for future generations is a key objective of the emerging local plan, and the NPPF. The draft CIL charging schedule would prevent such development because it would not be viable. Both PBSA and residential accommodation above shops makes an important contribution to housing supply but its delivery is seriously threatened by the draft CIL charging schedule.
- xix. A more sophisticated approach to the proposed rates would be setting a distinct city centre zone given the city centre commands the high values but also is subject to significant development cost because it is within an area of archaeological importance (huge risk/ cost for developments historically and in the future), the city centre is all in the historic core conservation area, the extremely high concentration of listed buildings, and most is high flood risk. The rest of the city commands lower values but lower development costs (typically).

- xx. Without CIL relief (e.g. 'zero' rated) for conversion and upward extension of listed buildings the draft CIL charging schedule threatens the restoration and long-term future of York's heritage, and comprehensive regeneration schemes in the city centre.

Policy Requirements

- xxi. The adopted local plan's policy requirements for most developments, particularly major developments have a cumulative cost impact when taken together. The Council does not appear to have fully considered how sites can also bear CIL given this demanding policy context. A full viability review and justifiable evidence of the modified policy requirements will be necessary. Policy requirements include (not exhaustive), the majority of which are not considered in the City of York CIL Viability Study Addendum (June 2025) by Porter Planning Economics.

- a) 75% carbon reduction aspirations – policy CC2 (modification) (this is considered within CIL Viability study)
- b) 10% Biodiversity net gain (this is considered within CIL Viability study)
- c) Accessible Housing Standards (this is considered within CIL Viability study)
- d) Archaeology – much of the city centre is within an archaeology area of importance which, taken on its own, gives rise to considerable risk, delay and development costs
- e) H10(i) states:

"higher rates of (affordable housing) provision will be sought where development viability is not compromised".

This implies that development may be subject to additional affordable housing if it can be viably provided, and that a viability assessment will be required for all applications over 5 units which will delay the determination period significantly, particularly given to limited capacity of the District Valuer. Policy H10 requires all viability assessments to be reviewed by the District Valuer.

- f) Changes to policy H7 and the requirement for nominations agreements.
- g) Air Quality assessments/mitigation for all major applications
- h) Flood mitigation measures. Policy requires a 30% betterment for surface water runoff which typically requires attenuation or SuDS, and much of the city centre is within high flood risk area. Again, taken on its own, flood mitigation gives rise to considerable risk and significant additional development costs.

- i) Heritage policy. The vast majority of the city centre is within the York Historic Core Conservation Area and contains amongst the highest concentration of listed buildings and scheduled ancient monuments in England. These heritage constraints arising from national and local heritage policies, taken on their own, gives rise to considerable risk and significant additional development costs.
- j) Travel Plan obligations e.g. car clubs, free bus travel, cycle equipment contributions, travel plan coordinator.
- k) Green infrastructure/ on-site open space provision – the local plan including its evidence base prescribes totally undeliverable targets with regards for open space as part of new development and currently S106 payments are sought for any shortfall. Will this now be provided through CIL and does this mean no on site provision is required? If not, on site provision has significant viability impacts.
- l) For example, draft local plan policy G16 seeks on-site open space provision for all residential developments, except in exceptional circumstances or for small sites. The amenity open space requirement is typically around 40.5sqm per bedroom depending of the level of local open space deficit (by electoral ward) – this spatial requirements is set out in the 2017 open space & GI update –

https://www.york.gov.uk/downloads/file/14274/open_space_and_green_infrastructure_update_2017.
- m) Cumulatively, the requirement for 40.5sqm per bedroom has significant implications for the viability of proposals, particularly large city centre schemes. A significant proportion of land within a development site would have to be given over to open space. This requirement does not seem to have been properly considered as part of the Council's draft CIL charging schedule evidence.

Five-year supply Calculation

Five Year Housing Supply

We disagree with the Councils assessment set out in their *Annual Housing Monitoring Update & Five-Year Housing Supply Position for 2024/25* dated June 2025 that their 5-year housing Land Supply is 5.7 years. The calculation of the 5-year supply is set out in Section 6 of the document.

Our assessment of the 5-year land supply is 4.82 years. The workings behind our calculation of the 5-year supply are set out below.

Table 1 – O'Neill Associates Assessment of 5-year land supply

Five Year Housing Land Supply Position for Period 2025/26 to 2030/31	
I. Five-year Requirement	5,560
J. Average annualised housing requirement over 5 years	1,112
K. Five-year Housing Land Supply (<i>Housing Trajectory with O'Neill Associates adjustments</i>)	5,357
L. Surplus/shortfall (K – I)	- 202
M. Five-year Housing Land Supply Against Requirement (K / (I / 5))	4.82 Years

Notes:

- 1 For the purpose of this calculation alone, we accept:
 - The five-year requirement of 5,560
 - The Average annualised housing requirement of 1,112
- 2 We disagree with the Councils assessment of the 5-year land supply of 6,378. Our assessment of the supply figure is **5,357**. Our assessment is based on over 25 years' experience of local market knowledge and planning and development proposals in York.
- 3 A table showing the housing trajectory and including a 5 year housing land supply calculation is provided at Section 5 of the councils Annual Housing Monitoring Update & Five-Year Housing Supply Position document. We have re-assessed the delivery of the sites in the trajectory based on information available in the public domain and our local market knowledge.

- 4 The main changes are to the timing of some completions highlighted in our adjusted housing trajectory (included as a separate document as our Appendix 2). Changes to the trajectories are highlighted by the white cells in the table. It is these changes to the trajectory which reduce the supply figure to **5,357**. The reasons for our adjustments are explained in the table below.

Table 2 Reasons for adjustments to Councils Housing trajectory

H1 a & b	Completion pushed back by one year. We have advised on this scheme and consider it unlikely completions will occur in 28/29
H8	Completions pushed back by 2 years. Site is temporarily being used as a medical facility. No application for housing submitted.
H46	Completion pushed back by 1 year. Approved by committee in January 2024. Decision not issued. Awaiting section 106 completion.
ST4	Completion pushed back by 1year. Outline permission Feb 2025. No applications for reserved matters submitted.
ST6	Unrealistic to consider that a developer will complete 999 dwellings in one year. Completions split over 2 years.
ST7	Completion pushed back by 1 year. Outline permission for 380 dwellings refused in May 2025.
ST8	Completions pushed back by 1 year. Reserved Matters not approved.
ST9	Completions pushed back by 1 year. Resolution to grant but decision held up pending signing of Section 106 Agreement.

Appendix 2

Councils Housing Trajectory with O'Neill Associates adjustments

(Submitted as a standalone document)

Annual Housing Monitoring Update & Five Year Housing Supply Position

Monitoring Year 2024/25

Published June 2025

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Executive Summary

The monitoring year runs between 1 April to 31 March each year. The statistics are updated bi-annually based upon monitoring of planning permissions and applications.

Housing Completions – Summary

In total **712 net additional homes were completed** during the monitoring year between 1 April 2024 and 31 March 2025. This total comprises two elements:

1. There have been a total of **649 net housing completions**¹. This includes the following:
 - 395 were new build homes (60.86%);
 - 258 (39.75%) net additional homes were a result of changes from other uses to residential homes, of which 33 were a result of 'prior approval' consents.
 - 4 homes resulted from conversions
 - 8 homes were demolished during the monitoring period;
2. In terms of the type of sites that were developed:
 - 485 homes (74.73%) were completed on housing sites (Use Class C3)
 - Significant sites providing housing completions (Use class C3) over the monitoring period have been the Former York City Football Ground, Bootham Crescent (25), Cocoa Works, Haxby Road (Phases II) (35), Former Civil Service Club, Boroughbridge Road (38), Cherry Tree House 218 Fifth Avenue (48), Germany Beck housing site (69), and Cocoa Works, Haxby Road (Phases I) (172)
 - 54 (8.32%) homes were on individual sites with five or less dwellings;
 - 135 (20.80%) net additional off campus, privately managed student 'cluster flats' were completed at Former Alton Cars, 3 James Street.
3. A further **63 net equivalent homes** resulted from additional bedspaces created at both new and existing care homes² within the authority area during the twelve-month monitoring period.

Housing Consents – Summary

Planning applications determined during the full monitoring period resulted in the approval of **739 net additional homes**³. A further 416 net additional homes were

¹ This figure takes account of the sum of all new build completions minus demolitions plus any gains or losses through change of use or conversions to existing properties.

² Additional care home bedspaces comprised Abbeyfield House Regency Mews (25), Haxby Hall York Road Haxby (16), York Wheelchair Centre Bluebeck House Bluebeck Drive (72) and Somerset Nursing Home 1 Church Lane Wheldrake (12). Whilst a new care home at Moorlands Nursing Home 10 - 12 Moor Lane Strensall that replaced an existing care home resulted in a loss of bedspaces (-6)

³ This figure takes account of all consents and proposed losses through demolitions and change to other uses or conversions to existing properties.

approved at Planning Committee during the monitoring period and are still awaiting legal agreement sign off.

The main features of the housing approvals are:

- 642 of all net homes consented (86.87%) were granted on housing sites (use class C3).
- Significant sites granted approval for housing (Use Class C3) includes new homes planned for housing allocations ST4: Land to South of Hull Road Heslington (162), ST33: Land to East of Millfield Industrial Estate Main Street Wheldrake (139), H29: Land to S/E of 51 Moor Lane Copmanthorpe (75) and the provision of new homes and the change of use at The Retreat 107 Heslington Road (120).
- 64 homes were approved on sites of 5 or less homes.
- 44 homes are to be lost through a change to other uses or through proposed demolition
- 133 purpose built student accommodation (PBSA) 'cluster' flats were approved at Enterprise Rent-a-Car 15 Foss Islands Road
- A further 416 homes have been approved through a resolution to grant consent at Planning Committee over the last twelve months and are currently subject to the execution of a section 106 legal agreement.
The most significant of these sites are:
 - The PBSA approved at 19 To 33 Coney Street (248),
 - Land To South And East Of The Cemetery New Lane Huntington (107),
 - Hungate Development Site (42 net additional homes compared to the previously consented total)

Housing Monitoring Update 2024/25

1 **Introduction**

- 1.1 Monitoring updates are produced bi-annually to monitor our Local Plan policies SS1: Spatial Strategy and H1: Housing Allocations regarding delivery of housing within the city. This work informs Government returns, where required, and will inform decision-taking, where necessary.
- 1.2 The data is compiled to be consistent with the Housing Delivery Test Rulebook⁴ (see also Annex 1).
- 1.3 Sources used for data collection included:
- Results from 6 monthly site visits (October and March) to verify the number of housing completions which have been carried out on each consented housing site;
 - Analysis of Building Control completion returns that provide information of both City of York Council and private building inspection records;
 - Regular contact with developers/applicants for each site over 10 dwellings to accurately monitor completions and to estimate the likely level of completions over the term of the build programme; and
 - Monitoring of extant consents, new permissions, and the inclusion of development through certificates of lawful development previously not included within housing returns.

Factors influencing delivery

- 1.4 As part of the monitoring process we seek to understand any factors influencing the progression of residential delivery in the city. Over the last few years labour and material shortages have affected housing delivery rates but more recently this has reportedly eased, particularly in relation to access to materials.
- 1.5 However, higher borrowing rates and the price of materials continue to affect the viability of projects; this has affected several sites, which have not produced the levels of completions previously anticipated in our published housing trajectories. Additionally, where a higher design specification is required, such as Passivhaus standard homes, developments have experienced delays as a result of the associated skills and procedures needed during their construction.

⁴ <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book/housing-delivery-test-measurement-rule-book>; see also Appendix 1.

2 Housing Completions 2024/25

Dwellinghouse Completions (C3)

- 2.1 A total of 649 net housing completions⁵ took place during the full 2024/25 monitoring year.

Table 2.1: Housing Completions 2024-25 (1 April 2024 to 31 March 2025)

Time Period	Completions	New Build	Net Conversions	Net Change of Use	Demolitions	Net Dwelling Gain
1 April 2024 – 30 September 2024	353	99	1	243	4	339
1 October 2024 – 31 March 2025	322	296	3	15	4	310
Total 2024/25	675	395	4	258	8	649

- 2.2 Out of the overall total, 54 net additional homes were provided on sites with five or less homes being built during the monitoring period. This represents 8.3% of all completions.
- 2.3 Table 2.2 highlights the more significant developments that resulted in housing completions on traditional housing sites (Use Class C3) over the twelve-month monitoring period.

Table 2.2: Housing Completion Sites (Use Class C3)

Site Name	Net Completions (1 April 2024 to 30 Sept 2024)	Net Completions (1 October 2024 to 31 March 2025)	Net Completions (2024/25)
Heworth House Clinic Heworth House Melrosegate	6	0	6
Church House 10-14 Ogleforth	10	0	10
Land to East of Middlewood Close Rufforth	0	13	13
York City Living 22-26 Blossom Street	0	15	15
York City Football Club Bootham Crescent	9	16	25

⁵ Net housing completions are calculated as the sum of new build completions, minus demolitions, plus any gains or losses through change of use or conversions to existing properties.

The Cocoa Works Haxby Road (Phase 2)	1	34	35
Former Civil Service Club & Agricultural Land to North of Boroughbridge Road	11	27	38
Cherry Tree House 218 Fifth Avenue	48	0	48
Germany Beck East of Fordlands Road	16	53	69
The Cocoa Works Haxby Road (Phase 1)	172	0	172
Sites providing 5 dwellings or less during the monitoring period	36	18	54
All Sites	309	176	485

- 2.4 Table 2.3 provides a breakdown of the **components of housing completions** for the full monitoring period.

Table 2.3: Components of Housing Completion Sites

Time Period	Type of Approval	Number of Sites with Completions	Gross Additional Homes Completed	Net Additional Homes Completed
1 April 2024 – 30 September 2024	Residential (Use Class 3) Approval	36	319	309
1 October 2024 – 31 March 2025		27	186	176
1 April 2024 – 30 September 2024	Prior Approval' Sites (see para 1.7 below for details)	2	33	33
1 October 2024 – 31 March 2025		0	0	0
1 April 2024 – 30 September 2024	Sites Granted Certificates of Lawful Use/Development	1	1	1
1 October 2024 – 31 March 2025		1	1	1
1 April 2024 – 30 September 2024	Sites Lost to Housing Through Change of Use/Demolition	4	N/A	-4
1 October 2024 – 31 March 2025		2	N/A	-2
1 April 2024 – 30 September 2024	Privately Managed Off Campus Student Accommodation	0	0	0
1 October 2024 – 31 March 2025		1	135	135
Total 2024/25	All sites	74	675	649

- 2.5 Table 2.4 provides details where completions relate to the '**prior approval**'⁶ category. In total these sites added 33 dwellings to the housing stock, 31 of which resulted from a conversion of commercial, business and service use to

⁶ See Appendix 1 for a full explanation of what constitutes a prior approval site.

residential homes. These completions represent a marked increase when compared to the supply from this same source over the previous three years.

- 2.6 Further, there are a number of unimplemented consents that fall within this category and there is added potential for a continued supply resulting from changes to the use class order introduced in 2022⁵.

Table 2.4: Housing Completions Resulting from 'Prior Approval' Sites

Time Period	Site Name	Gross Additional Homes Completed	Net Additional Homes Completed
1 April 2024 – 30 September 2024	Bright Beginnings Day Nursery 47 Rawcliffe Drive	2	2
	Gateway 2 Holgate Park Drive	31	31
1 October 2024 – 31 March 2025	None	0	0
2024/25	All Sites	33	33

Off-campus Student Accommodation

- 2.7 Table 2.5 provides the **completions of privately managed off campus student accommodation**. Over the course of the monitoring year, this has accounted for 135 net additional homes.
- 2.8 In line with DLUHC dwelling definitions⁷, student accommodation 'can be included towards the housing provision in local development plans' and "*purpose-built (separate) homes (e.g. self-contained flats clustered into units with 4 to 6 bedrooms for students) should be included. Each self-contained unit should be counted as a dwelling*". There is further explanation at Appendix 1 to clarify how student accommodation is assessed in terms of housing completions.

Table 2.5: Completions via Off Campus Privately Managed Student Accommodation Sites

Time Period	Site Name	Gross Additional Homes Completed	Net Additional Homes Completed
1 April 2024 – 30 September 2024	n/a	0	0
1 October 2024 – 31 March 2025	Alton Cars York Ltd 3 James Street	135	135
Total 2024/25	All Sites	135	135

- 2.9 No university managed student bedspaces were completed during the monitoring year.

⁷ see: <https://www.gov.uk/guidance/housing-statistics-and-england-housing-survey-glossary/a-to-z>

Certificates of Lawful use/development

- 2.10 A total of two net additional homes resulted from the **granting of certificates of lawful use/development** over the monitoring year. Details of these properties are included in Table 6.

Table 2.6: Completions through Certificates of Lawful Use and Permitted Use

Time period	Site Name	Gross Additional Homes Completed	Net Additional Homes Completed
1 April 2024 – 30 September 2024	Minster Alpacas Sutton Road Wigginton	1	1
1 October 2024 – 31 March 2025	Annex 258 Strensall Road	1	1
Total 2024/25	All Sites	2	2

Homes lost through changes of use

- 2.11 Table 2.7 provides details of **approvals that have led to losses of homes through changes to other uses**. This has resulted in a net loss of 4 homes over the monitoring year.

Table 2.7: Sites lost to housing through change of use.

Time period	Site Name	Description of change/conversion	Net Homes Lost
1 April 2024 – 30 Sept 2024	2 Queen Annes Road	Change of use from C3 dwelling to C1 short term letting accommodation (retrospective)	-1
	Rowntree Park Lodge Richardson Street	Change of use of upper floors from residential use (Use Class C3) to a community venue/hub (Use Class F2)	-1
	27 St Helens Road	Erection of 17no. extra care flats and 8no. dementia care flats following demolition of no.27 St Helens Road	-1
	33 Spen Lane	Conversion of 1no. dwelling to 2no. flats, to be used for holiday accommodation.	-1
	7 Nunthorpe Avenue	Change of use from HMO (C4) and Flat (C3) to Large House in Multiple Occupation (Sui Generis)	-1
	2 The Mews St Catherines House Skelton	Change of use from residential (Class C3) to acupuncture clinic (Class E)	-1
2024/25	All Sites		-6

Communal Establishments

- 2.12 Table 2.8 sets out the Equivalent Net Homes through Communal Establishments.

Table 2.8 Equivalent Net Homes through communal establishments

Year	Equivalent Net Homes through Communal Establishments
2017-2018	35
2018-2019	2
2019-2020	67
2020-2021	21
2021-2022	258
2022-2023	392
2023-2024	-63
2024-2025	63
2017-2025	775

- 2.13 A net addition of 119 care home bedspaces took place during the monitoring period. These included Abbeyfield House Regency Mews (25), Haxby Hall York Road Haxby (16), York Wheelchair Centre Bluebeck House Bluebeck Drive (72) and Somerset Nursing Home 1 Church Lane Wheldrake (12). Whilst a new care home at Moorlands Nursing Home 10 - 12 Moor Lane Strensall that replaced an existing care home resulted in a loss of bedspaces (-6).
- 2.14 Applying the national ratio⁸ this results in a net gain of 63 homes to the overall net housing figure for the year.

Completion Trend Data

- 2.15 Table 2.9 provides details of all net housing completions over the Local Plan monitoring period between 2017-2025 and the previous 10 full monitoring years.
- 2.16 Over the Local Plan period, we have had 4965 net housing completions, 775 equivalent communal establishment homes resulting in an additional 5,740 homes overall.
- 2.17 Considering trends over the previous monitoring years the figures reveal⁹:

	10 years 2015 - 2025	5 years 2020-2025
Total net completions	7063	2660
Mean average additional homes	706.3	532
Median average Additional Homes	591	528

⁸ See appendix 1 for details of the ratio used for the conversion to net dwellings.

⁹ See appendix 1 for notes regarding 'mean' and 'median'

Table 2.9: Summary of data between 1 April 2015 to 31 March 2025

Year	Completions	New Build	Net Conversions/ COU	Net Conversions	Net Change of Use	Demolitions	Net Dwelling Gain	Communal Establishments	Overall net gain in Local Plan period
2015-2016	1171	908	219	1	218	6	1121		
2016-2017	996	420	564	21	543	7	977		
2017-2018	1336	1111	195	12	183	10	1296	35	1331
2018-2019	481	299	155	18	137	5	449	2	451
2019-2020	596	437	134	11	123	11	560	67	627
2020-2021	643	469	159	14	145	6	622	21	643
2021-2022	419	350	58	18	40	6	402	258	660
2022-2023	494	411	55	1	54	7	459	392	851
2023-2024	569	390	146	3	143	8	528	-63	465
2024-2025	675	395	262	4	258	8	649	63	712
Local Plan delivery 2017-2025	5213	3862	1164	81	1083	61	4965	775	5740
10 year delivery 2015-2025	7380	5190	1947	103	1844	74	7063		

Housing Mix and Type

- 2.18 Analysis of housing mix based upon gross completions shows that the most significant delivery was 1 bed and 2 bedroom flats followed by 3 and 4 bed houses.

Table 2.10: 2024/25 Completions (gross) – Housing Mix

Dwelling Type	1 Bed	2 Bed	3 Bed	4 Bed	5+ Bed	Totals	%
Detached House	0	0	27	44	9	80	11.85%
Semi-detached House	0	5	27	7	0	39	5.78%
Detached Bungalow	0	4	5	0	0	9	1.33%
Semi-detached Bungalow	0	3	0	0	0	3	0.44%
Town House/ Terraced House	2	39	36	12	7	96	14.22%

Flat/Apartment/Studio	283	121	17	0	27	448	66.37%
Totals	285	172	112	63	43	675	
%	42.22%	25.48%	16.59%	9.33%	6.37%	42.22%	

Table 2.11: 2024/25 housing mix aggregated by dwelling type

Dwelling Type	Totals	Percentage
Detached (all types)	89	13.19%
Semi-detached (all types)	42	6.22%
Terraced/Town House	96	14.22%
Flat/Apartment/Studio	448	66.37%
Totals	675	100.00%

Affordable housing completions

- 2.19 During the course of the monitoring year, 129 affordable homes were completed. Over the duration of the plan period so far (2017-2015) a total of 993 affordable dwellings have been completed.
- 2.20 The housing mix in relation to delivery over the last year and over the monitoring period mirror each other with the majority of completions shown to be 1/2 bedroom flats followed by 2/3 bedroom houses¹⁰.

Table 2.12: Affordable Housing Completions – Housing Mix

Year	1-bed flat	2-bed flat	1-bed house	2-bed house	3-bed house	4-bed house	Total
2017/18	25	32	0	6	10	1	74
2018/19	5	24	2	14	15	0	60
2019/20	31	47	5	18	16	7	124
2020/21	41	27	6	29	22	5	130
2021/22	68	57	0	40	44	10	219
2022/23	38	0	0	32	42	9	121
2023/24	11	26	0	61	33	5	136
2024/25	37	34	0	26	27	5	129
Total 2017-2025	256	247	13	226	209	42	993
% split for 2024/25	29%	26%	0	20%	21%	4	100%
% split over 2017-2025	26%	25%	1%	23%	21%	4%	100%

¹⁰ "Houses" includes a small number of bungalows.

Figure 1: Affordable Housing Mix (By Bedroom Numbers) 2017/18 to 2024/25

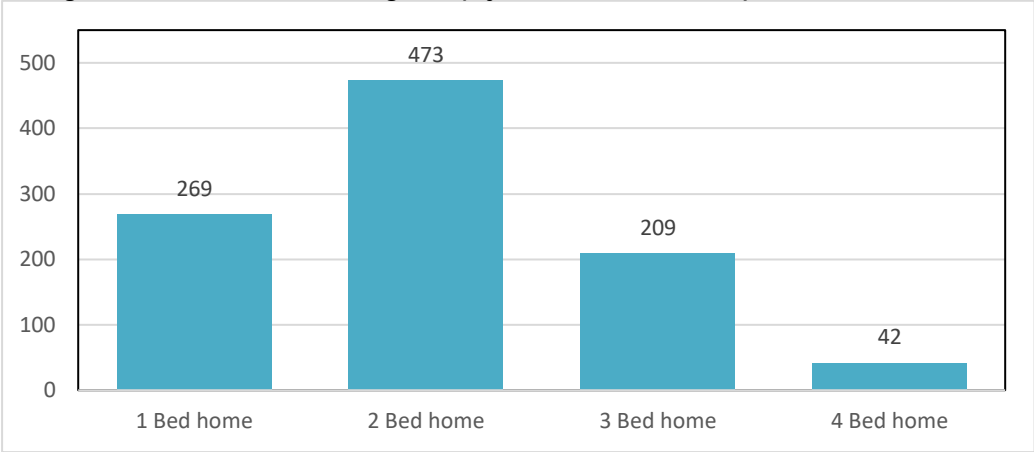
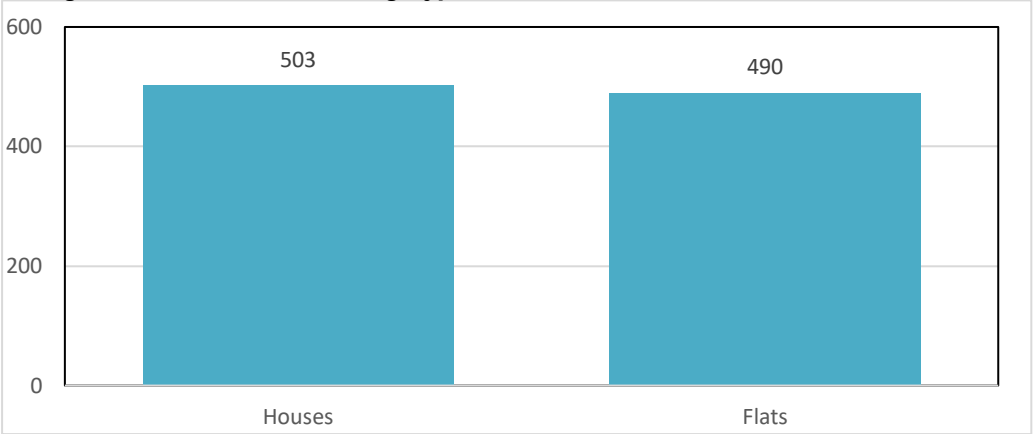


Figure 2: Affordable Housing Type 2017/18 to 2024/25



3 Housing Consents 2024/25

- 3.1 During the full 2024/25 monitoring year a **total of 739 net new homes were granted consent within the City of York authority area**. Table 3.1 shows that 603 of these approvals are for new build homes whilst 147 new homes were consented for the change of use of non-residential buildings.

Table 3.1: Housing Consents (1 April 2024 to 31 March 2025)

Year	Consents (Gross)	Proposed New Build	Proposed Net Conversions	Proposed Net Change of Use	Proposed Demolitions	Potential Net Dwelling Gain
1 April 2024 – 30 September 2024	399	353	-1	36	5	383
1 October 2024 – 31 March 2025	380	250	2	111	7	356
2024/25	779	603	1	147	12	739

- 3.2 Of the 739 net additional homes granted consent, the greatest proportion were the result of 642 net homes being approved on standard housing (Use Class C3) sites. Table 3.2 provides details of the largest contributors within the housing approvals including the new homes planned for housing allocation ST4: Land to South of Hull Road Heslington (162), ST33: Land to East of Millfield Industrial Estate Main Street Wheldrake (139), H29: Land to S/E of 51 Moor Lane Copmanthorpe (75) and the provision of new homes and the change of use at The Retreat 107 Heslington Road (120). A further 64 net new homes gained approval on sites with a capacity of 5 homes or less.

Table 3.2: Housing Consents (Use Class C3)

	Site Name	Gross Additional Homes Consented	Net Additional Homes Consented
1 April 2024 – 30 September 2024	Card Factory 24-25 High Ousegate	6	6
	Development Site Hospital Fields Road & Ordnance Lane	16	16
	Land to S/E of 51 Moor Lane Copmanthorpe	75	75
	Land to East of Millfield Industrial Estate Main Street Wheldrake	139	139
	Sites Granted Consent for 5 or less Homes	52	36
	3-7 Coney Street	7	7

1 October 2024 – 31 March 2025	John Richards (Developments) Ltd 7 Regent Buildings York Road Acomb	9	9
	Dean Court Secure Car Park R/O Portland Street	9	9
	Tramways Club 1 Mill Street	35	35
	The Retreat 107 Heslington Road	120	120
	Land to South of Hull Road Heslington	162	162
	Sites Granted Consent for 5 or less Homes	51	28
2024/25	All Sites	681	642

Table 3.3 provides a detailed breakdown of the various categories of housing approval that make up the consented totals, this being a combination of traditional (Use Class 3) residential approvals, sites with 'prior approval', privately managed off-campus student accommodation and sites granted certificates of lawful use/development. The figures in this table also takes account of approved losses through demolition or changes to other uses.

Table 3.3: Components of Housing Consents (1 April 2024 to 31 March 2025)

Year	Type of Approval	Number of Sites Granted Consent for Housing	Gross Additional Homes Consented	Net Additional Homes Consented
1 April 2024 – 30 September 2024	Residential (Use Class 3) Approval	33	288	272
1 October 2024 – 31 March 2025		38	393	370
1 April 2024 – 30 September 2024	Prior Approval' Sites (see Appendix 1 for details)	1	1	1
1 October 2024 – 31 March 2025		5	6	5
1 April 2024 – 30 September 2024	Sites Granted Certificates of Lawful Use/Development	1	1	1
1 October 2024 – 31 March 2025		1	1	1
1 April 2024 – 30 September 2024	Sites Lost to Housing Through Change of Use/Demolition	2	-24	-24
1 October 2024 – 31 March 2025		2	-20	-20
1 April 2024 – 30 September 2024	Privately Managed Off Campus Student Accommodation	1	133	133
1 October 2024 – 31 March 2025		0	0	0

2024/25	All Sites		779	739
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Prior Approval Consents

- 3.3 Six sites were granted 'prior approval' through the change of use from commercial, business and service (Use Class E) or agricultural use (sui generis) to residential use (see Table 3.4), most of which were approved during the first half of the monitoring year.

Table 3.4: Sites Consented as a Result of 'Prior Approval'

	Site Name	Gross Additional Homes Approved	Net Additional Homes Approved
1 April 2024 – 30 September 2024	Former RAF Units Beechlands to Parish Boundary Acaster Malbis	1	1
1 October 2024 – 31 March 2025	GMB General Union 75 Gillygate	2	2
	NatWest 14 Main Street Heslington	1	1
	36 Moor Lane Strensall	1	0
	Duncombe Farm Duncombe Lane Strensall	1	1
	Tegz Hair Design 1 Plantation Drive	1	1
2024/25	All Sites	7	6

Off campus student accommodation consents

- 3.4 Table 3.5 shows that during the monitoring period the former Enterprise Rent-a-Car site at 15 Foss Islands Road was granted consent for 133 studio flats for students.

Table 3.5: Privately managed off campus student accommodation consents

Time period	Site Name	Gross Additional Homes Approved	Net Additional Homes Approved
1 April 2024 – 30 September 2024	Enterprise Rent-a-Car 15 Foss Islands Road	133	133
1 October 2024 – 31 March 2025	None	0	0
2024/25	All Sites	133	133

Certificates of Lawful Use consents

- 3.5 Two sites gained approval via certificates of lawful use/development resulting in the approval of 6 net additional homes within this category (Table 3.6).

Table 3.6: Consents Granted through Certificates of Lawful Use/ Development

Time period	Site Name	Gross Additional Homes Consented	Net Additional Homes Consented
1 April 2024 – 30 September 2024	Minster Alpacas Sutton Road Wigginton	1	1
1 October 2024 – 31 March 2025	Annex 258 Strensall Road	1	1
2024/25	All Sites	7	6

- 3.6 In addition to the 739 net additional approvals, a further 416 homes were approved by Planning Committee during the twelve-month period through resolutions to grant planning permission subject to the execution of a section 106 legal agreement and required conditions.
- 3.7 Table 3.7 provides details of all these sites, with the most significant sites being purpose built student accommodation approved for Coney Street (248) and new residential development at New Lane Huntington (107). Approval of 42 net additional homes on the Hungate Development Site also adds to the previously consented residential offer.

Table 3.7: Sites with a resolution to grant planning permission subject to the execution of a legal agreement.

	Site Name	Gross Additional Homes Approved	Net Additional Homes Approved
1 October 2024 – 31 March 2025	Site Of 19 To 33 Coney Street	248	248
	Land To South And East Of The Cemetery New Lane Huntington	107	107
	Land To The West Of 1 To 8 Garthway New Earswick	14	14
	Hungate Development Site Hungate	221	42
	Garages At Hawthorn Terrace South New Earswick	5	5
2024/25	All Sites	595	416

Housing Consent Trend Data

- 3.8 Table 3.8 shows that York had 11,743 extant consents overall at year end (31 March 2025).
- 3.9 To provide context to recent planning approvals, Table 17 shows:
- 11,743 net consents over the last 10 full monitoring years:
 - mean average of **1,174.3** annual housing consents
 - median average of **921.5** annual consents.
 - 4,416 net consents over the last 5 years:
 - a mean average of **883.2** annual consents
 - a median average of **739** annual consents.

Table 3.8: Housing Consents Granted Between 1 April 2015 and 31 March 2025

Year	Gross Housing Permissions	Net Housing Permissions
2015/2016	710	680
2016/2017	487	451
2017/2018	1147	1104
2018/2019	1658	1626
2019/2020	3488	3466
2020/2021	1151	1133
2021/2022	354	327
2022/2023	1586	1559
2023/2024	684	658
2024/2025	779	739
2015 to 2025	12044	11743

4 **Local Plan site allocations monitoring**

- 4.1 See Section 5 Housing Trajectory for how the sites are anticipated to be built out over the plan period.

Housing Allocations Below 5 ha (H Sites)

Local Plan Allocation Reference	Planning status
H1a & b Former Gas Works, 24 Heworth Green	Planning consent approved; site remediation ongoing: <ul style="list-style-type: none"> • 19/00979/OUTM – 607 homes • Zone A: 21/00855/REMM (119 homes) • Zone B: 22/01281/REMM (392 homes). • Zone C: 21/00854/REMM (96 homes)
H3 Burnholme School	Outline Planning permission approved for 83 dwellings; No matters reserved except for the appearance, scale and internal layout of 5no. self-build plots in Terrace 5. (20/01916/OUTM)
H5 Lowfield School	Outline and full planning approval consented. <ul style="list-style-type: none"> • 17/02429/OUTM • 17/02428/FULM - erection of 96no. two and three storey houses, 26no. bungalows and three storey 18no. apartment building with new access and associated infrastructure • 18/02925/FULM - Erection of 5no. apartments, 5no. two bedroom housing units, 6no. three bedroom housing units, 3no. four bedroom housing units and a shared common house/amenity block and associated infrastructure to form community housing development •
H7 Bootham Crescent	Full planning consent approved 01/02/2022 (19/00246/FULM) for 93 dwellings. Construction ongoing.
H8 Askham Bar Park & Ride	No application or pending application for residential use. Temporary permission granted for health facility.
H10 The Barbican	Planning consent lapsed for 187 dwellings (13/02135/FULM).
H20 Former Oakhaven EPH	22/00304/FULM for 64 bed care home approved 05/08/2022
H29 Land at Moor Lane Copmanthorpe	19/00602/FULM full approval granted 07/06/2024.
H31 Eastfield Lane Dunnington	20/01626/FULM approved on 18/07/2022 for 83 dwellings 24/01669/FULM pending approval at 1 April 2025.
H38 Land RO Rufforth Primary School Rufforth	22/01844/FULM full approval granted 17/04/2023

H39 North of Church Lane Elvington	No consent or pending applications.
H46 Land to North of Willow Bank and East of Haxby Road, New Earswick	20/02495/FULM approved by planning committee on 18.01.2024; pending final decision. Approved for 177 dwellings, pumping station and substation together with means of vehicular and pedestrian access, associated parking, landscaping and open space
H52 Willow House EPH, 34 Long Close Lane	No consent or pending application
H53 Land at Knapton Village	Application pending decision for 6 dwellings (24/00726/FUL)
H55 Land at Layerthorpe	No consent or pending application
H58 Clifton Without Primary school	22/00685/OUTM approved for 15 dwellings on 11/11/2022
SH1 Land at Heworth Croft	No consent or pending application

Housing Allocations Above 5 ha (ST Sites)

Local Plan Allocation Reference	Planning Status
ST1: British Sugar/ Manor School Allocated for 1200 homes	Outline PP approved 28.9.18 for up to 1,100 homes (15/00524/OUTM) Remediation works underway. Manor School part of the site is included in the CYC Housing Delivery Programme (100 homes)
ST2: Former Civil Service Sports Ground Millfield Lane Allocated for 263 homes	Full PP for 266 homes approved 25.10.19 (14/02979/FULM) Site under construction.
ST4: Land Adj. Hull Road and Grimston Bar Allocated for 263 homes	Full planning permission approved 28/02/2025. <ul style="list-style-type: none"> 15/00166/FULM (166 homes) 15/00167/FULM (52 homes) Pending construction.
ST5: York Central Allocated for 2,500 homes	Outline PP approved 24.12.19 for up to 2,500 homes as part of a mixed-use scheme.
ST7: Land East of Metcalfe Lane Allocated for 845 homes	Application 24/02302/OUTM pending decision at 1 April 2025.

ST8: Land North of Monks Cross Allocated for 968 homes	Outline PP for around 970 homes approved 14.12.22. Reserved matters being progressed.
ST9: Land North of Haxby Allocated for 735 homes	Application 23/00160/OUTM pending decision at 1 April 2025..
ST14: Land to West of Wigginton Road Allocated for 1348 homes	No consent or pending application.
ST15: Land to West of Elvington Lane Allocated for 3339 homes	No consent or pending application
ST16 Terrys extension site: Clock tower (Phase 1)	Full permission for 22 homes and museum space permitted 14.12.2022 (22/00542/FUL) Construction completed.
ST16: Terrys Extension Site: Terrys Car Park (Phase 2) Allocated for 39 homes	Full application for extra care accommodation including no.72 apartments – approved by appeal 15.03.2024 (23/00608/FULM)
ST17: Nestle South (Phase 1) Allocated for 279 homes	Full permission for 279 homes granted approval on 03.03.2020 Completed
ST17: Nestle South (Phase 2) Allocated for 302 homes	Full application approved 28.01.2022 (21/01371/FULM) Site under construction
ST31: Land to the South of Tadcaster Road, Copmanthorpe Allocated for 158 homes	Outline PP approved for 158 homes 28.4.23 (18/00980/OUTM) Reserved Matters approved 14.02.2025 for 133no. dwellings, 7no. self-build dwellings and associated infrastructure (23/02256/REMM)
ST32: Hungate (Phases 5+) Allocated for 570 homes	Full permission for erection of an apartment block to comprise residential units (Use Class C3) together with flexible commercial uses (Use Class E and F2), landscaping and associated works (Block H) approved at committee 16.01.25. Pending legal agreement for final decision.
ST33: Station Yard Wheldarke Allocated for 150 homes	Full planning permission approved 17.05.2024 for 139 homes landscaping and associated infrastructure
ST36: Imphal Barracks, Fulford Road	No consent or pending application.

Allocated for 769 homes	No pre-app or preliminary discussions
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5 Housing Trajectory at 1 April 2025

		Total	Actual Completions																					
			2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	Post 2038
1. Net Housing Completions 2017 to 2024																								
	Net Housing Completion		1296	449	560	622	402	459	528	649														
	Net Communal Establishment and Student Accommodation Completions (Ratios applied)		35	2	67	21	258	392	-63	63														
Total			1331	451	627	643	660	851	465	712														
2. Housing Allocations Below 5 ha (H Sites)																								
H1a & b	Former Gas Works, 24 Heworth Green (National Grid Properties)	607												392	215									
H3	Burnholme School	83									65	13	5											
H5	Lowfield School	165									14	5												
H7	Bootham Crescent	93									40	18												
H8	Askham Bar Park & Ride	60												35	25									
H10	The Barbican	187											187											
H20	Former Oakhaven EPH	34										34												
H29	Land at Moor Lane Copmanthorpe	86									10	30	30	5										
H31	Eastfield Lane Dunnington	83										10	30	30	13									
H38	Land RO Rufforth Primary School Rufforth	21									8													
H39	North of Church Lane Elvington	32												17	15									
H46	Land to North of Willow Bank and East of Haxby Road, New Earswick	117										20	35	40	22									
H52	Willow House EPH, 34 Long Close Lane	15												15										
H53	Land at Knapton Village	4										4												
H55	Land at Layerthorpe	20													20									
H58	Clifton Without Primary school	15											15											
SH1	Land at Heworth Croft	167														167								
Annualised Projected Completions H Sites (Hide)											137	134	115	721	310	167	0	0	0	0	0	0	0	0
3. Housing Allocations Above 5 ha (ST Sites)																								
ST1a	British Sugar/Manor School	1100													50	150	150	150	150	150	150	150		
ST1b	Manor School	100														35	35	30						
ST2	Former Civil Service Sports Ground Millfield Lane	263									60	46	17											
ST4	Land Adj. Hull Road and Grimston Bar	211										17	50	50	45									
ST5	York Central	2500													999			501		136			450	414
ST7	Land East of Metcalfe Lane	845												50	90	120	120	120	120	120	105			
ST8	Land North of Monks Cross	970										50	100	100	100	100	100	100	100	100	100	20		
ST9	Land North of Haxby	700											45	90	90	90	90	90	90	90	25			
ST14	Land to West of Wigginton Road	1348												60	60	160	160	160	160	160	160	160	108	
ST15	Land to West of Elvington Lane	3339												50	75	160	200	200	200	200	240	240	240	1534
ST16	Terrys Extension Site - Terrys Car park (Phase 2)	38												38										
ST17	Nestle South (Phase 2)	302									64	0	61	127	15									
ST31	Land to the South of Tadcaster Road, Copmanthorpe	158									17	42	46	35										
ST32	Hungate	613											196		221		196							
ST33	Station Yard Wheldarke	147									10	30	30	30	30	9								
ST36	Imphal Barracks, Fulford Road	769															100	100	100	100	100	100	100	169
Annualised Projected Completions for ST Sites											151	185	545	630	1775	824	1051	1451	920	1056	880	670	898	
4. Projected Housing Completions From Non Allocated Unimplemented Consents (Inclusive of																								
Total		2007									414	487	406	444	90	61	35	35	35					
5. Projected Housing Completions From Communal Establishments/Student Accommodation																								
Total		107									19	0	0	88	0	0	0	0	0	0	0	0	0	0
Supply Trajectory																								
Actual Net Completions (2017 to 2025)			1331	451	627	643	660	851	465	712														
Projected Completions (all sites)											721	806	1066	1883	2175	1052	1086	1486	955	1056	880	670	898	
Windfalls											0	0	0	196	196	196	196	196	196	196	196	196	196	
Projected Annual Housing Completions (Inc Windfall Allowance)											721	806	1066	2079	2371	1248	1282	1682	1151	1252	1076	866	1094	
Cumulative Completions (Including Windfalls)			1331	1782	2409	3052	3712	4563	5028	5740	6461	7267	8333	10412	12783	14031	15313	16995	18146	19398	20474	21340	22434	
Over/Under Supply			509	138	-57	-236	-398	-369	-726	-836	-937	-953	-709	548	2097	2523	2983	3843	4172	4602	4856	4900	5172	
Detailed Trajectory (including 10% Non-Implementation (NI) Rate)																								
A. Projected Completions (all sites) - 10% NI Applied											649	725	959	1695	1958	947	977	1337	860	950	792	603	808	
B. Windfall Allowance														196	196	196	196	196	196	196	196	196	196	
C. Projected Annual Completions (A + B) + Actual completions 2017-2025			1331	451	627	643	660	851	465	712	649	725	959	1891	2154	1143	1173	1533	1056	1146	988	799	1004	
D. Cumulative Annual Completions (10% NI applied and windfalls)			1331	1782	2409	3052	3712	4563	5028	5740	6389	7114	8074	9964	12118	13261	14434	15968	17023	18169	19157	19956	20961	
E. Annual requirement			822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	
F. Cumulative Annual Requirement			822	1644	2466	3288	4110	4932	5754	6576	7398	8220	9042	9864	10686	11508	12330	13152	13974	14796	15618	16440	17262	
G. Over/Under Supply (D - F)			509	138	-57	-236	-398	-369	-726	-836	-1009	-1106	-968	100	1432	1753	2104	2816	3049	3373	3539	3516	3699	
5 Year Housing Land Supply Position																								
H. 5 year requirement (822 * 5)										4110	4110	4110	4110	4110	4110	4110	4110	4110						
I. Shortfall to be carried over remaining plan period (absolute value of G)										836	1009	1106	968	0	0	0	0	0						
J. Shortfall within 5 years (5 x (G ÷ remaining plan period)) (Liverpool)										523	721	921	968	0	0	0	0	0						
K. 20% Buffer (0.2 x (H + J))										927	966	1006	1016	822	822									
L. 5% Buffer (0.05 x H)																206	206	206						
M. Rolling Total Five Year requirement (H + J + buffer)										5559	5797	6038	6094	4110	4110	4316	4316	4316						
N Rolling Five year land supply (from row C)										6378	6872	7320	7894	7059	6052	5897	5522	4993						
O. Over/under Supply (with NI applied) against total 5 year requirement (N - M)										819	1075	1282	1800	2949	1942	1581	1207	678						
P. Land supply in Years (no account for previous oversupply)										5.74	5.93	6.06	6.48	8.59	7.36	6.83	6.40	5.79						

6 **Five Year Housing Land Supply**

The Council's 5-year housing land supply position based on the Local Plan housing Trajectory at 1 April 2025. This demonstrates a **5.74 year housing supply**.

Housing Requirement

- 6.1 The baseline against which the deliverable supply of housing land is assessed is known as the "housing requirement". For York this is based on the adopted Local Plan (2025), which sets out an annual housing target of 822 dwellings per annum.

Buffer

- 6.2 A buffer of 20% must be added to the supply of sites where an authority's performance in the Housing Delivery Test (HDT) indicates that delivery has fallen below 85% of its housing requirement over the previous three years¹¹. The City of York last scored 79% in the results published 19 December 2024¹² so a buffer of 20% is required.

Shortfall

- 6.3 The National Planning Practice Guidance¹³ advises that where shortfalls in housing completions have been identified against planned requirements, the shortfall should be included in the 5 year housing land supply.
- 6.4 It was demonstrated through the Local Plan Examination that delivery of all shortfall within the first 5 years (the 'Sedgefield Method') would not meet the NPPF expectations to be realistic. Therefore, we have justified the use of the 'Liverpool Method' to deliver supply whereby shortfall is sought to be met over the plan period.
- 6.5 On that basis, an additional 523 homes are required to meet the shortfall between 2017 to 2025.

Table 6.1: Housing Delivery 2017 to 2025

Total Net Completions	
A. Total Completions 2017/18 to 2024/25	5740
B. Requirement 2017/18 to 2024/25	6576
C. Shortfall in housing delivery 2017/18 to 2024/25 (B-A)	836
D. Shortfall to be delivered over 5 years (5 x (C/8) (Liverpool Method)	523

Table 6.2: Five-year Housing Land Requirement

¹¹ Based on government information and using the Housing Delivery Test Rulebook:

<https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>

¹² <https://www.gov.uk/government/publications/housing-delivery-test-2023-measurement>

¹³ <https://www.gov.uk/guidance/housing-supply-and-delivery#demonstrating-a-5-year-housing-land-supply>

Five year Housing Land Requirement	
E. Annual Housing Requirement	822
F. Five-year Housing Requirement (5 x E)	4110
G. Five-year Housing Requirement Incorporating Shortfall (F + D)	4633
H. Buffer 20% (G x 0.2)	927
I. Five-year Requirement (G + H)	5560

Sites in the supply

- 6.6 This section of the report provides details of the sources of housing supply that the Council has determined to be deliverable within 5 years.
- 6.7 The NPPF defines deliverable for the purposes of including sites within the 5-year housing land supply. It separates sites into two distinct categories. It states that:
'To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:
(a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
(b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.'
- 6.8 The assessment undertaken to inform the position applies this deliverability definition to the Council's ongoing monitoring of sites, set out in section 1 and 2 of this report.

Communal Accommodation

- 6.9 The NPPF and PPG recognise that student and other communal accommodation should form part of housing supply, based on the amount of housing they free up to the market. As such it is appropriate to factor in development for student and other communal accommodation into the housing supply assessment and the Council has also justified this approach as part of the Local Plan examination⁵.
- 6.10 National guidance sets out a process to identify the amount of housing it releases using ratios for student accommodation and residential institutions as follows:
- Student dwelling ratio of 2.5
 - Residential institution ratio of 1.8
- 6.11 These ratios have been applied to relevant sites and incorporated into the supply calculation.

Windfall allowance

- 6.12 The NPPF states that ‘*where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends*’. The emerging Local Plan allocates very few sites of 10 dwellings or less, but it is expected that developments (including conversions/changes of use) on small sites will continue to form part of new housing supply in line with evidenced past trends.
- 6.13 The latest evidence of windfall supply in York is published alongside this report and justifies a rate of 196 dwellings per year from year 4 onwards in the Council’s trajectory of development across the Local Plan period. As the windfall allowance for small sites uses completion data rather than permissions there is a high degree of certainty that this rate of delivery will be achieved. It is therefore not necessary to apply a non-implementation discount to this element of the supply.

Table 6.3: Sources of Five-year Housing Land Supply

Deliverable Supply	
All approved sites (with 10% non-implementation rate applied)	4743
Sites with planning permission for communal establishments (with 10% non-implementation rate applied)	96
Local Plan Allocations without consent and allocated sites with a resolution to grant planning permission (with 10% non-implementation rate applied)	810
Sites with resolution to grant planning permission (with 10% non-implementation rate applied)	337
Windfall allowance - 196(years 4 and 5)	392
Total	6378

Summary Table

Table 6.4: Five-Year Housing Land Supply Position for Period 2025/26 to 2030/31

Five Year Housing Land Supply Position for Period 2025/26 to 2030/31	
I. Five-year Requirement (Table 6.2)	5560
J. Average annualised housing requirement over 5 years	1112
K. Five-year Housing Land Supply (Table 6.3)	6378
L. Surplus/shortfall (K – I)	+ 818
M. Five-year Housing Land Supply Against Requirement (K / (I / 5))	5.74 Years

Appendix 1: Notes

Calculation of Student Accommodation Units and Communal Establishment Accommodation within the Housing Figures

We use two nationally set ratios to calculate student accommodation units for inputting into our monitoring figures. Currently bedspaces for student communal accommodation are divided by 2.4 and all other communal accommodation is divided by 1.9 based on 2021 Census analysis.

MHCLG have produced a "[Housing statistics and English Housing Survey glossary](#)"¹⁰. Within the definition for Dwelling (Housing supply; net additional dwellings), it is stated that

"purpose-built (separate) homes (eg self-contained flats clustered into units with 4 to 6 bedrooms for students) should be included. Each self-contained unit should be counted as a dwelling".

Updated National Planning Practice Guidance (NPPG) provides direction for local authorities when dealing with student housing in their housing supply and is covered in the *Counting Other Forms of Accommodation* section (paragraph 034 Reference ID: 68-034-20190722)¹¹. This confirms that *"All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority's housing land supply..."* based on a number of criteria.

Further clarification is provided through the dwelling definition in the [Housing Flow Reconciliation \(HFR\) returns form and guidance notes](#)¹² where MHCLG have provided direction to local authorities relating to student accommodation and communal accommodation for their assessment of completions.

Each housing site including off campus privately managed student accommodation has been assessed in these terms by CYC in calculating housing capacity and is represented in the tables above.

For example, the Proposed Student Accommodation at Hallfield Road comprised 326 bed spaces in 28 x 1, 2 x 3, 17 x 4, 40 x 5 and 4 x 6 bed cluster units and was calculated as **91** housing units when the DLUHC definition was applied. Whereas, St Josephs Convent, Lawrence Street included 660 bed spaces in 514 x 1, 1 x 3, 19 x 5 and 8 x 6 bed cluster units which equated to **542** housing units when the DLUHC definition was applied.

Averages used within this document.

For clarity:

The calculation of a **mean average** results from adding up all the numbers and then dividing by the number of numbers – this is the usual way of displaying an average and takes account of all figures.

The **median average** is the "middle" value in the list of numbers. To find the median the numbers need to be listed in numerical order from smallest to largest and the mid-point is taken. The potential advantage of using a median average is that very large and very small values don't affect it.

Prior Approval Sites

By way of background information, regulations came into force in May 2013 that increased permitted development and change of use rights in England so that some building work could be undertaken without the need for full planning permission¹³. This was to be a temporary arrangement for 3 years until May 2016. However, in October 2015 the Housing and Planning Minister announced new measures proposed in the Housing and Planning Bill that the then temporary relaxation of permitted development (PD) rights allowing for office to residential conversions (ORCs) together with certain retail, financial services and existing agricultural buildings were to become permanent.

When the new Use Class E came into force in September 2020 it introduced flexibility into changes of use by grouping together commercial, business and service uses and allowing change between these uses without requiring planning permission. The extension to PD rights now provides further flexibility by allowing uses within Class E to change to residential use. The new PD rights allow restaurants, medical facilities, creches, gyms and indoor sports facilities to change to residential use without requiring planning permission subject to certain conditions and regulations such as Environmental Impact Assessments and Habitats Regulations.

Housing Flow reconciliation returns

Submission of completions to the Government through annual Housing Flows Reconciliation Returns¹⁴ requires that full details of net homes delivered in a year should be confirmed annually. This calculation is based on:

1. Net Additional Dwellings National Statistic, plus
2. Net increase in bedrooms in student communal accommodation in local authority divided by average number of students in student only households in England, plus
3. Net increase in bedrooms in other communal accommodation in local authority divided by average number of adults in households in England.

The adjustments for student and other communal accommodation are calculated by DLUHC and applied to the Housing Delivery Test submission. Adjustments are made using two nationally set ratios and are based on England Census data, as above¹⁵.

¹⁴ <https://www.gov.uk/government/collections/net-supply-of-housing>

¹⁵ Following the publication of the latest housing delivery test rulebook in December 2024 Table 9 includes a combination of the old and new ratios from both the 2011 and 2021 Census results. Our figures have been adjusted since our last publication to align with MHCLG figures.

Further Information

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Housing Trajectory at 1 April 2025

		Total	Actual Completions																					
			2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	Post 2038
1. Net Housing Completions 2017 to 2024																								
	Net Housing Completion		1296	449	560	622	402	459	528	649														
	Net Communal Establishment and Student Accommodation Completions (Ratios applied)		35	2	67	21	258	392	-63	63														
Total			1331	451	627	643	660	851	465	712														
2. Housing Allocations Below 5 ha (H Sites)																								
H1a & b	Former Gas Works, 24 Heworth Green (National Grid Properties)	607													392	215								
H3	Burnholme School	83									65	13	5											
H5	Lowfield School	165									14	5												
H7	Bootham Crescent	93									40	18												
H8	Askham Bar Park & Ride	60														35	25							
H10	The Barbican	187												187										
H20	Former Oakhaven EPH	34										34												
H29	Land at Moor Lane Copmanthorpe	86									10	30	30	5										
H31	Eastfield Lane Dunnington	83											10	30	30	13								
H38	Land RO Rufforth Primary School Rufforth	21									8													
H39	North of Church Lane Elvington	32												17	15									
H46	Land to North of Willow Bank and East of Haxby Road, New Earswick	117											20	35	40	22								
H52	Willow House EPH, 34 Long Close Lane	15												15										
H53	Land at Knapton Village	4										4												
H55	Land at Layerthorpe	20													20									
H58	Clifton Without Primary school	15											15											
SH1	Land at Heworth Croft	167														167								
Annualised Projected Completions H Sites (Hide)											137	104	80	289	497	452	25	0	0	0	0	0	0	0
3. Housing Allocations Above 5 ha (ST Sites)																								
ST1a	British Sugar/Manor School	1100													50	150	150	150	150	150	150	150		
ST1b	Manor School	100														35	35	30						
ST2	Former Civil Service Sports Ground Millfield Lane	123									60	46	17											
ST4	Land Adj. Hull Road and Grimston Bar	162											17	50	50	45								
ST5	York Central	2500													500	499		501		136			450	414
ST7	Land East of Metcalfe Lane	845													50	90	120	120	120	120	120	105		
ST8	Land North of Monks Cross	970											50	100	100	100	100	100	100	100	100	100	20	
ST9	Land North of Haxby	700												45	90	90	90	90	90	90	90	25		
ST14	Land to West of Wigginton Road	1348												60	60	160	160	160	160	160	160	160	108	
ST15	Land to West of Elvington Lane	3339												50	75	160	200	200	200	200	240	240	240	1534
ST16	Terrys Extension Site - Terrys Car park (Phase 2)	38												38										
ST17	Nestle South (Phase 2)	267									64	0	61	127	15									
ST31	Land to the South of Tadcaster Road, Copmanthorpe	140									17	42	46	35										
ST32	Hungate	613											196		221		196							
ST33	Station Yard Wheldarke	139									10	30	30	30	30	9								
ST36	Imphal Barracks, Fulford Road	769															100	100	100	100	100	100	100	169
Annualised Projected Completions for ST Sites											151	118	417	535	1241	1338	1051	1451	920	1056	960	880	918	
4. Projected Housing Completions From Non Allocated Unimplemented Consents (Inclusive of																								
Total		2007									414	487	406	444	90	61	35	35	35					
5. Projected Housing Completions From Communal Establishments/Student Accommodation																								
Total		107									19	0	0	88	0	0	0	0	0	0	0	0	0	0
Supply Trajectory																								
Actual Net Completions (2017 to 2025)			1331	451	627	643	660	851	465	712														
Projected Completions (all sites)											721	709	903	1356	1828	1851	1111	1486	955	1056	960	880	918	
Windfalls											0	0	0	196	196	196	196	196	196	196	196	196	196	
Projected Annual Housing Completions (Inc Windfall Allowance)											721	806	1066	1552	2024	2047	1307	1682	1151	1252	1156	1076	1114	
Cumulative Completions (Including Windfalls)			1331	1782	2409	3052	3712	4563	5028	5740	6461	7267	8333	9885	11909	13956	15263	16945	18096	19348	20504	21580	22694	
Over/Under Supply			509	138	-57	-236	-398	-369	-726	-836	-937	-953	-709	21	1223	2448	2933	3793	4122	4552	4886	5140	5432	
Detailed Trajectory (including 10% Non-Implementation (NI) Rate)																								
A. Projected Completions (all sites) - 10% NI Applied											649	638	813	1220	1645	1666	1000	1337	860	950	864	792	826	
B. Windfall Allowance														196	196	196	196	196	196	196	196	196	196	
C. Projected Annual Completions (A + B) + Actual completions 2017-2025			1331	451	627	643	660	851	465	712	649	638	813	1416	1841	1862	1196	1533	1056	1146	1060	988	1022	
D. Cumulative Annual Completions (10% NI applied and windfalls)			1331	1782	2409	3052	3712	4563	5028	5740	6389	7027	7840	9256	11097	12959	14155	15689	16744	17890	18950	19938	20961	
E. Annual requirement			822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	
F. Cumulative Annual Requirement			822	1644	2466	3288	4110	4932	5754	6576	7398	8220	9042	9864	10686	11508	12330	13152	13974	14796	15618	16440	17262	
G. Over/Under Supply (D - F)			509	138	-57	-236	-398	-369	-726	-836	-1009	-1193	-1202	-608	411	1451	1825	2537	2770	3094	3332	3498	3699	
5 Year Housing Land Supply Position																								
H. 5 year requirement (822 * 5)										4110	4110	4110	4110	4110	4110	4110	4110							
I. Shortfall to be carried over remaining plan period (absolute value of G)										836	1009	1193	1202	608										
J. Shortfall within 5 years (5 x (G + remaining plan period)) (Liverpool)										523	721	994	1202	608										
K. 20% Buffer (0.2 x (H + J))										927	966	1021	1062	944	822									
L. 5% Buffer (0.05 x H)																206	206	206						
M. Rolling Total Five Year requirement (H + J + buffer)										5559	5797	6125	6374	5662	4932		4316	4316						
N Rolling Five year land supply (from row C)										5357	6570	7128	7849	7488	6793	5991	5783	5272						
O. Over/under Supply (with NI applied) against total 5 year requirement (N - M)										-202	773	1003	1474	1826	1861	1676	1468	957						
Annual requirement with buffer										1112	1159	1225	1275	1132	986	863	863	863						
P. Land supply in Years (no account for previous oversupply)										4.82	5.67	5.82	6.16	6.61	6.89	6.94	6.70	6.11						