



City of York Local Plan Examination Hearing Statement on behalf of Defence Infrastructure Organisation

Matter 5: Housing Land Supply

March 2022

Report Title: York Local Plan Examination – Phase 2 Hearing Statement – Matter 5

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Status: Final

Draft date: 16 March 2022

For and on behalf of Avison Young (UK) Limited

1. Matter 5: Housing Land Supply

- 5.1 Does Policy SS1, and the Plan as a whole, provide an appropriate policy framework for the delivery of housing over the Plan period? If not, how is this to be addressed?
- 1.1 On the basis of our assessment of the Council's housing land supply (see below), the Plan cannot be said to provide an appropriate policy framework for the delivery of adequate housing over the plan period. The only way that the issues highlighted in this Statement can be satisfactorily addressed is with the allocation of additional land for housing development.
 - 5.2 We understand through the latest housing trajectory update [EX/CYC/69] that the sources of housing land supply underpinning the Plan are as follows:
 - 8,642 dwellings on allocated new strategic housing sites (ST)
 - 1,703 dwellings on allocated housing sites (H)
 - 1,853 dwellings (commitments unimplemented permissions as at 1 April 2021)
 - 3,113 dwellings (cumulative completions between 2017-2021)
 - planning permission or resolution to grant planning permission as at 1 April 2021)
 - 720 dwellings in communal establishments /student accommodation
 - 1,764 dwellings on windfall sites (from 2024/25 2032/33 @196 per annum) to 2032/33

This provides a total housing supply of a minimum of 17,795 dwellings during the Plan period. Is this correct?

- 1.2 The Inspectors are correct that the above components are combined to calculate the total amount of new homes that are provided for in the Local Plan. However, there are a number of errors in the Council's trajectory as follows:
 - a) H3 Burnholme School the trajectory indicates that this site will deliver 72 homes but outline planning permission was granted for 83 dwellings on 14 October 2021 (20/01916/OUTM);
 - b) H5 Lowfield School the Council indicates that the capacity of this site is 165 homes (although the total number of homes shown in the trajectory is 162) but full planning permissions have been granted for 140 dwellings (17/02428/FULM 21 August 2018) and 19 dwellings (18/02925/FULM 25 March 2019), giving a total of 159 dwellings;
 - c) H29 Land at Moor Lane Copmanthorpe the trajectory indicates that this site will deliver 88 dwellings but an application for full planning permission for 91 dwellings was submitted to the Council in 2019 (19/00602/FULM);
 - d) H31 Eastfield Lane, Dunnington the trajectory indicates that this site will deliver 76 homes but the Council resolved to grant full planning permission for 78 dwellings on 7 October 2021 (20/01626/FULM);

- e) H38 Land RO Rufforth Primary School, Rufforth the trajectory indicates that this site will deliver 33 homes but an application for full planning permission for 21 dwellings was submitted in December last year (21/02661/FULM);
- f) H46 Land to the north of Willow Bank and East of Haxby Road, New Earswick the trajectory indicates that this site will deliver 104 homes but an application for full planning permission for 117 dwellings was submitted in December 2020 (20/02495/FULM).
- 1.3 The trajectory indicates that the Council's 'H Sites' will deliver 1,706 dwellings. However, when the above errors are corrected, the total reads 1,717 dwellings.
 - 5.3 We note that the windfall allowance per annum has been increased from 169 dwellings per annum in previous housing trajectories (e.g. [EX/CYC/17]) to 196 dwellings per annum in the 2021 Housing Trajectory [CYC/EX/69]. Is this correct? If so, what is the basis and justification for this change in the windfall allowance?
- 1.4 Yes, the windfall allowance has been increased from 169 to 196. We have seen no explanation for this increase and no evidence that justifies it. The adjustment that the Council has made has added 243 homes to its supply.
 - 5.4 Is the estimate of windfall numbers identified by the Plan appropriate and realistic? Is the approach consistent with the Framework? Given the time that has passed since the Plan was submitted, is the identified windfall allowance in the Plan (169 dwellings per annum) still appropriate, realistic and justified?
- 1.5 The NPPF states that:

Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to 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, and should not include residential gardens. (paragraph 48)

- 1.6 The Council appears to have based its assumptions as regards windfalls on past trends (focussing on data from the past 10 years). In this period, the number of homes delivered through windfall developments has varied. There have been years in which the total number of windfalls has exceeded 169 and years in which the total has been less. But regardless of the numbers, there are several compelling reasons why, in York, it is not appropriate to base future windfall forecasts on past trends. These include the fact that:
 - the Council hasn't had an up-to-date plan since 1954. As a consequence, it will naturally have seen a higher number of windfall developments compared to an Authority with an adequate supply of allocated sites. It doesn't follow that historic levels of windfalls will continue to be seen when the Local Plan is adopted and proposed housing allocations are confirmed;
 - because the City is surrounded by Green Belt, the Council is compelled to exhaust the capacity of its urban areas when allocating land for development in this Plan. This must mean that future windfall opportunities will be more scarce than they have been historically;

- the number of homes that Authorities have seen delivered via the conversion of Office buildings will reduce over time and the number of outmoded buildings in the market will also reduce; and
- there are only sites for 717 dwellings on York's Brownfield Land Register (2021) that are not already proposed to be allocated. The total windfall allowance being made by the Council (in the Plan period) currently amounts to 1,764 which is far in excess of the capacity of the sites that appear in the Brownfield Register.
- 1.7 In our view, the above factors indicate that: (i) there is no compelling evidence that indicates that it is appropriate for the Council to include a windfall allowance in the next 5 years and (ii) there is no robust evidence which indicates that an allowance of either 169 or 196 dwellings per annum is appropriate and realistic.
- 1.8 If a windfall allowance is to be made in the Council's housing trajectory, this should not appear sooner than 2028 / 2029 (5 years after adoption) and it should not be as high as 169 dwellings per annum (let alone 196 dwellings per annum). Having regard to the factors listed above, it seems to DIO that it would be more appropriate and realistic for the Council to make a windfall allowance of no more than 120 dwellings per annum from 2027 or 2028 onwards. A figure of 120 would reflect the lower of the rates achieved historically, at a time before office to residential conversations were allowed as permitted development, and is likely to better reflect the scale of opportunity for windfalls that remains, after the Council has exhausted its urban capacity for the purposes of preparing this Plan.
- 1.9 If the windfall allowance were to be reduced to 120dpa, and the point at which it is inserted into the trajectory deferred to 2028, the total housing supply shown in the trajectory for the period 2021 to 2033 would reduce by 1,164 homes. Over the period to 2038, the reduction would increase to 1,544.
 - 5.5 Are the suggested rates of planned housing development realistic and achievable when considered in the context of the past completion rates? Where is the evidence to support the approach adopted?
- 1.10 In the majority of cases the council appears to be making reasonable and appropriate assumptions about the number of homes that are likely to be delivered each year across the various sites in its trajectory. However, there are some obvious issues which will need to be interrogated during the Hearing Session.
- 1.11 The standout issue arises in respect of ST15 (Elvington Lane) which the Council assumes will deliver 210 dwellings per annum for a two-year period from 2030 and then 280 per annum during each of the following 6 years. So far as we can tell, such rates have never before been achieved in the York administrative, and we have seen no evidence to suggest that such rates are capable of being achieved on a single site in the future, even with the assistance of multiple housebuilders / sales outlets. It is noteworthy that, in the peak years assumed in respect of ST15, this one development is forecast to account for up to circa 30% of the Council's housing delivery. Yet there is no evidence of the Council have considered the ability of the market to absorb this level of supply from a single location. In the absence of clear and compelling evidence justifying the delivery rates assumed in respect of ST15, these should be reduced to more appropriate levels, consistent with other major allocations (i.e. to levels below 200dpa).
 - 5.6 Is the housing trajectory update [EX/CYC/69] realistic? In the context of footnote 11 of the NPPF, does it form an appropriate basis for assessing whether sites are deliverable?

- 1.12 The Council's trajectory contains details of dwellings that have already been delivered (in the period 2017 to 2021) and those that are expected to be delivered in the period 2021 to 2033 and then 2033 to 2038:
 - a) on housing allocations of less than 5ha (H Sites);
 - b) on housing allocations larger than 5ha (ST Sites);
 - c) on sites for student accommodation and communal establishments; and
 - d) as windfalls.
- 1.13 For each category of site, the Council forecasts housing delivery in the next 5 years and in the period beyond that.
- 1.14 In order for the Inspectors to conclude that it is appropriate to assume that housing will be delivered in the next 5 years, they must be satisfied that these sites are 'deliverable'. The NPPF provides that 'deliverable' means that they are: housing should be "available now", offer a "suitable location or development now" and "be achievable with a realistic prospect that housing will be delivered on the site within 5 years and that development of the site is viable". The NPPG adds that:
 - for sites that do not involve major development and have planning permission and all sites with detailed planning permission should be considered 'deliverable' until permission expired, unless there is clear evidence that homes will not be delivered within 5 years (i.e. no longer viable, OR there is no longer a demand for the type or units or sites have long term phasing plans) or:
 - Where a site has OPP for major development, has been allocated in a development plan, has a grant of permission in principles, or is identified on a brownfield register, should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years.
- 1.15 For sites that are forecast to deliver housing after 5 years, the Inspectors must be satisfied that these are 'developable'. The NPPF states that to be considered developable "sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged".
- 1.16 We have examined the sites and categories of development that appear in the Council's trajectory and have identified issues in respect of a number of the assumptions that the Council has made in respect of forecast delivery. For the H and ST Sites, we have provided a short summary of the issues we have identified, and have provided a re-cast trajectory for each of the sites that we have found issues with, in the excel file that is appended to this Statement. The issues that we have identified can be summarised as follows:
 - a) of the 35 sites that the Council assumes will deliver housing within 5 years of now (i.e. 2022 to 2027), we have concluded that 19 are not demonstrably deliverable having regard to the tests set by the NPPF and the guidance contained in the NPPG. Accordingly, the earliest that one should assume these sites will deliver new homes is 2027 / 2028 (more than 5 years from this year). Pushing back the forecasts for these sites has impacts for both (i) the number of homes that can reasonably expect to be delivered in the period 2021 2027 and (ii) the overall number of homes that can be expected to be delivered in the Plan period;
 - b) insofar as Site ST15 is concerned, the available evidence (including submissions made to the Examination by the site promoter) indicates that (i) there is apparently a fundamental disagreement between the promoter and the Council about the form that this development should take; and (ii) ST15 in its current form, it is not likely to deliver homes until 2029 at the

earliest. The Council assumes that it will begin to deliver housing in 2024 and will deliver 700 homes in the final 3 years of the Plan period. Neither assumption is robust. A correction to the trajectory for ST15 has impacts on the numbers of homes that are likely to be delivered both in the next 5 years and in the plan period as a whole; and

- c) we have made corrections to the total dwelling yield that can be expected from several sites to reflect the most up to date planning application information.
- 1.17 In addition, and as noted above, we have a fundamental concern with the assumptions that the Council has made in respect of windfalls and we have seen no evidence to demonstrate that the Council has made sound assumptions about the delivery of 1,853 homes from non-allocated sites with unimplemented consents
- 1.18 Finally, we consider that the Council has made an error when including in its trajectory past completions and forward commitments in respect of student accommodation. The Council's trajectory includes two sets of housing numbers that it attributes to student accommodation. The first is for completions in the period 2017-2021 and the second is for student accommodation and communal establishments yet to be built. The number of homes assumed in respect of past completions is 186 and the number included in the Council's forward supply is 720. Both, in our opinion, are unreliable and should be removed from the trajectory.
- 1.19 The NPPG provides the following in respect of how student accommodation should be treated in the context of housing land supply:

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: the amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential use); and / or the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation. This will need to be applied to both communal establishments and to multi bedroom self-contained student flats. Several units of purpose-built student accommodation may be needed to replace a house which may have accommodated several students. Authorities will need to base their calculations on the average number of students living in student only accommodation, using the published census data, and take steps to avoid double-counting. The exception to this approach is studio flats designed for students, graduates or young professionals, which can be counted on a one for one basis. A studio flat is a one-room apartment with kitchen facilities and a separate bathroom that fully functions as an independent dwelling.

- 1.20 We have not been able to find any document which explains how or why the Council has concluded that 186 homes can be assumed to have been released into the market (or retained in the market) as a consequence of student accommodation developments completed in the period 2017-2021. Moreover, we can find no such information to support the Council's assumptions in respect of its forward supply.
- 1.21 What the Council appears to have done is assume that for every 2.5 student beds that are provided in purpose built student accommodation, either a private dwelling is released into the market or a private dwelling remains in private use (as opposed to being rented to students). Yet it has produced no evidence to suggest that this is what is happening in the market.
- 1.22 In the light of the fact that the majority of purpose built student accommodation appears to be being constructed to satisfy demands arising from an increasing student population, we consider it inappropriate to assume that such accommodation will release rented homes back into the market. It

is possible that by providing more student accommodation, a greater proportion of private family housing could remain in private use, but, again, if the majority of new student accommodation is being constructed to deal with an increase in the size of the student population, its effect on the existing rental market will be very limited indeed. Of course, even if it could reasonably be assumed that the provision of purpose built student accommodation would have a positive effect on the number of private dwellings that there are in the market, the Council should be using a ratio of students / dwelling that more closely resembles what happens in the rental market and it is rare that as few as 2.5 students occupy a single house. If such a ratio is to be used, it would be appropriate in our view to assume 3 or 4 students per dwelling. In that case, one would have to be delivering at least 2,160 to 2,880 student beds in order to free up 720 private homes.

- 1.23 Ultimately, unless and until the Council can produce robust and compelling evidence which demonstrates that it is appropriate to assume that building student accommodation in York either releases homes back into the private market, or enables private homes to remain as such, there should be no student accommodation allowance built into the housing trajectory.
- 1.24 When all of the above mentioned adjustments are made to the Council's trajectory (save any adjustment in respect of housing completions from non-allocated unimplemented consents), we conclude that the Plan provides for the delivery of 13,174 new homes in the period to 2033. This is 4,621 less than asserted by the Council and is just 22 dwellings over its its stated housing requirement. This is not acceptable. The Council should be planning to deliver more homes than are required in order to provide the flexibility that will enable it to adapt to rapid change in accordance with paragraph 14 of the NPPF. In our view, this means planning to over deliver by at least 15%. On our analysis, the Plan is, without even considering the need for safeguarded land which we have previously said is necessary here, falling a minimum of 1,950 homes short of doing so (even on the basis of the Council's 'need' figure which we say is not sound).

5.7 What is the five-year housing supply requirement upon adoption of the Plan?

- 1.25 This will depend on (i) when one assumes the Plan will be adopted; (ii) what assumptions one makes about completions in the period from 2017 to the point of adoption (including what reasonable assumptions can be made about supply derived from the construction of purpose built student accommodation (see above)); (iii) whether one assumes that the housing requirement is 822dpa or something different (see our Matter 2 Statement and Phase 1 Hearing Statement on housing need); (iv) how one deals with past under-supply (Liverpool v Sedgefield); and (iv) whether one applies a buffer to account for previous failings in terms of housing delivery.
- 1.26 Because we do not have completion data for 2021-2022 yet, and because we cannot predict how many homes will be delivered between now and when the Plan is likely to be adopted, a robust calculation cannot be undertaken. However, if we (i) use the Council's past completions data (including its figures for student accommodation); (ii) use the Council's forecast completions data for student accommodation and non-allocated unimplemented consents; (iii) use our forecast completions data for the H and ST sites; (iv) we assume that the Local Plan will be adopted in, say, March 2023; and (v) we apply a 20% buffer to reflect past under performance; the calculation would be as follows:
 - Requirement: 5,287 (822 x 5 + 296 (shortfall) + 20% buffer) (or 1,057 dpa)
 - Supply for the period 2023 2028 (taken from AY Trajectory): 4,739
 - Supply in Years: 4.48

Note: shortfall is calculated as follows: completions 2017-2021 (3,113) + forecast completions for 2021-2023 (as per above listed assumptions) (1,523) – requirement 2017-2023 (822 x 6 = 4,932) = -296

- 1.27 If we remove from the past and forecast completions the student accommodation data, the calculation would be as follows:
 - Requirement: 6,273 (822 x 5 + 1,134 (shortfall) + 20% buffer) (or 1,255 dpa)
 - Supply for the period 2023 2028 (taken from AY Trajectory): 4,671
 - Supply in Years: 3.72

Note: shortfall is calculated as follows: completions 2017-2021 (2,927) + forecast completions for 2021-2023 (871) – requirement 2017-2023 (822 x 6 = 4,932) = -1,134

- 5.8 Will the Council be able to demonstrate a rolling five-year housing land supply upon adoption of the Plan?
- 1.28 We will need to comment on this when the trajectory is corrected and the Council runs the calculation, but based on the above analysis, the answer will almost certainly be no.
 - 5.9 The five-year housing supply, as set out in the latest housing trajectory update [EX/CYC/69], includes an allowance for windfall sites the aforementioned 196 per annum:
 - a) What is the compelling evidence that such sites have consistently become available in the local area and that they will continue to provide a reliable source of supply?
 - b) Is the allowance made realistic, having regard to paragraph 48 of the Framework?
- 1.29 See above.
 - 5.10 Does the five-year housing land supply position, as set out in the updated Housing Trajectory 2021 [EX/CYC/69], present the most up-to-date position? Is it consistent with all other remaining up-to-date housing evidence? If not, how is this to be addressed?
- 1.30 No, see above.
 - 5.11 Paragraph 5.9 of the submitted Plan identifies that the Council accepts that there has been a persistent under delivery of housing as defined by the NPPF. As such, does the submitted Plan, and any subsequent submitted evidence on meeting housing need and supply, take into account the requirement for a 20% buffer to be applied to the housing supply? Has this buffer been applied to any subsequent update of evidence or proposed modification to the Plan identified?

- 1.31 The Council has applied a 20% buffer to the 5 year land supply calculation that appears at the foot of its trajectory, but it has not ran its calculation from 2022 or from the point at which the Plan is likely to be adopted and has not rolled its land supply calculation forward beyond the first 5 years and so it is not yet possible to tell when the land supply position improves to the point that a 20% buffer will not be required.
 - 5.12 Overall, is there a supply of specific deliverable sites sufficient to provide five years' worth of housing, with an appropriate buffer (moved forward from later in the Plan) to ensure choice and competition in the market for land?

1.32 No. See above.

Appendix 1

CYC Trajectory

ase Date 1 A	etailed housing Trajectory Updated (Housing Requirement 822 dpa/ 790 dpa OAN) April 2021	1	2017/18	Actual Co 2018/19	•	2020/21	2021/22 2	022/23 20	023/24 2	2024/25 2	2025/26	2026/27	2027/28 202	8/29 20	29/30 20	030/31 203	31/32	2032/33	2033/34	2034/35	2035/36	2036/37 20	037/38
	g completions 2017-2021																						
	Net housing completion	2927	1296	449	560	622																	
	Net Communal Establishment and Student Accommodation Completions	186	35		67	82																	
otal		3113	1331	451	627	704																	
Housing All	Former Gas Works, 24 Heworth Green (National Grid Properties)	607	,	1	1				215		392	<u> </u>					1			ı	1	 	
3	Bumholme School	72						35	37		392												
5 5	Lowfield School	165					85	71	5/														
ວ 7	Bootham Crescent	93					65	15	35	35	0												
17		93						15	35	25	٥												
18	Askham Park & Ride	107					-		35	25		107											
110	The Barbican	187							35	21		187											
120	Former Oakhaven EPH	50							35	35	10												
129	Land at Moor Lane Copmanthorpe	88						25		35	18												
131	Eastfield Lane Dunnington	76						35	35	- 6													
138	Land RO Rufforth Primary School Rufforth	33							18	15													
139	North of Church Lane Elvington	32							17	15													
146	Land to the North of Willow Bank and East of Haxby Road, New Earswick	104							35	35	34												
152	Willow House, EPH, 34 Long Close Lane	15							15														
153	Land at Knapton Village	4							4														
155	Land at Layerthorpe	20								20													
156	Land at Hull Road	69					69																
158	Clifton Without Primary School	25							15	10													
otal	Annualised requirements to the right.	1706					154	156	537	217	452	187	0	0	0	0	0	0	0	0	0	0	0
	locations Projected Completions Above 5 ha (ST Sites)													1									
T1a	British Sugar/ Manor School	1100										150	150	150	150	150	150	150	50				
ST1b	Manor School	100										35	35	30									
T2	Former Civil Service Sports Ground Millfield Lane	266						48	48	48	48	48	26										
T4	Land Adj. Hull Road and Grimston Bar	211							35	35	35	35	35	36									
T5	York Central	2500							45	107	107	107	107	119	119	119	119	143	143		143	143	143
T7	Land East of Metcalfe Lane	845								35	35	70	70	70	70	70	70	70	70	70	70	70	5
T8	Land North of Monks Cross	968	3					35	70	70	70	105	105	105	105	105	105	93					
Т9	Land North of Haxby	735							35	35	35	70	70	70	70	70	70	70	70				
T14	Land to West of Wigginton Road	1348	3						35	70	105	105	105	105	105	105	105	105	105		105	88	
T15	Land to West of Elvington Lane	3339								35	70	105	105	105	140	210	210	280	280	280	280	280	280
T16	Terrys Extension Site - Terrys Clock Tower (Phase 1)	22					10	12															
T16	Terrys Extension Site - Terrys Car Park (Phase 2)	33							17	16													
ST16	Terrys Extension Site - Land to rear of Terrys Factory (Phase 3)	56							18	17	21												
ST17	Nestle South (Phase 1)	279						35	244														
ST17	Nestle South (Phase 2)	425							50	50	50	50	50	50	50	50	25						
ST31	Land to the South of Tadcaster Road, Copmanthorpe	158							35	35	35	35	18										
ST32	Hungate (Phases 5+) (Blocks D&H)	375									196	179											
ST33	Station Yard Wheldarke	147	,						35	35	35	35	7										
ST36	Imphal Barracks, Fulford Road	769																100	100	100	100	100	100
Annualised Pr	rojected Completion for ST Sites	8642					10	130	667	588	842	1129	883	840	809	879	854	1011	818	768	698	681	528
I. Projected H	Housing Completions from Non Allocated Unimplemented Consents																						
Total		1853					298	459	543	112	223	65	65	65	23	0	0	0	0	0	0	0	0
. Projected H	Housing Completions From Communal Establishments/ Student Accommodation																						
otal		720					183	469	62	0	6	0	0	0	0	0	0	0	0	0	0	0	0
upply Trajec	ctory																						
Actual Net Co	ompletions		1331	451	627	704																	
	mpletions (all sites)						645	1214	1809	917	1523	1381	948	905	832	879	854	1011	818		698	681	528
Vindfalls							0	0	0	196	196	196	196	196	196	196	196	196	196			196	196
rojected Hou	using Completions (Inc Windfall Allowance)						645	1214	1809	1113	1719	1577	1144	1101	1028	1075	1050	1207	1014	964	894	877	724
Cumulative Co	Completions (Including Windfalls)		1331	1782	2409	3113	3758	4972	6781	7894	9613	11190	12334	13435	14463	15538	16588	17795	18809	19773	20667	21544	22268
	(790pa plus 32 under supply) 822dpa		822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	790	790	790	790	790
Requirement			822	_		3288	4110	4932	5754	6576	7398	8220	9042	9864	10686		12330	13152	13942		15522	16312	17102
Requirement Cumulative R	lequirement			_		-175	-352	40	1027	1318	2215	2970	3292	3571	3777	4030	4258	4643	4867		5145	5232	5166
umulative R	•		509																				
Cumulative Ro Over/Under S	•		509						1000	917	1523	1381	948	905	832	879	854	1011	818	768	698	681	528
Cumulative Ro Over/Under S Detailed Traje	Supply		509				645	1214	1809					815	749		769	910					
umulative Rover/Under Sover/Under Soverailed Trajerojected Con	Supply ectory (including 10% Non-Implementation Rate) mpetions (all sites)		509				645 581	1214 1093	1628	825	1371	1243	853			791	/091	210	736	691	628		475
Cumulative Ro Over/Under S Detailed Traje Projected Con Projected Con	Supply ectory (including 10% Non-Implementation Rate) mpetions (all sites) mpletions (all sites) - 10% Non-implementation Rate Applied	1764																		1		613	
Jumulative Ro Over/Under S Detailed Traje Projected Con Projected Con Vindfall Allov	Supply ectory (including 10% Non-Implementation Rate) mpetions (all sites) mpletions (all sites) - 10% Non-implementation Rate Applied wance	1764			627	704	581	1093	1628	196	196	196	196	196	196	196	196	196	196	196	196	613 196	196
Cumulative Ro Over/Under S Detailed Traje Projected Con Projected Con Vindfall Allov Total Projecte	Supply ectory (including 10% Non-Implementation Rate) mpetions (all sites) mpletions (all sites) mpletions (all sites) - 10% Non-implementation Rate Applied wance ed Completions (with 10% Non implementation rate applied and windfall) + Actual		1331	451		704 3113	581 581	1093	1628 1628	196 1021	196 1567	196 1439	196 1049	196 1011	196 945	196 987	196 965	196 1106	196 932	196 887	196 824	613 196 809	196 671
umulative Rover/Under Sover/Under Sover/Under Sover/Under Sover/Under Sover/Under Sover/Undfall Allowotal Projecter Sover/Undfall Projecter Sover/Undfall SoveryUndfall So	Supply ectory (including 10% Non-Implementation Rate) mpetions (all sites) mpletions (all sites) - 10% Non-implementation Rate Applied wance ed Completions (with 10% Non implementation rate applied and windfall) + Actual completions (with 10% Non implementation rate applied and windfalls)			L 451		704 3113	581 581 3694	1093 1093 4787	1628 1628 6415	196 1021 7436	196 1567 9002	196 1439 10441	196 1049 11490	196 1011 12501	196 945 13446	196 987 14433	196 965 15397	196 1106 16503	196 932 17435	196 887 18323	196 824 19147	613 196 809 19956	196 671 20627
cumulative R Over/Under S Detailed Traje Projected Cor Projected Cor Vindfall Allov Otal Projecte Cumulative Co	Supply ectory (including 10% Non-Implementation Rate) mpetions (all sites) mpletions (all sites) - 10% Non-implementation Rate Applied wance ed Completions (with 10% Non implementation rate applied and windfall) + Actual completions (with 10% Non implementation rate applied and windfalls) ing Target		1331	451			581 581 3694 790	1093 1093 4787 790	1628 1628 6415 790	196 1021 7436 790	196 1567 9002 790	196 1439 10441 790	196 1049 11490 790	196 1011 12501 790	196 945 13446 790	196 987 14433 790	196 965 15397 790	196 1106 16503 790	196 932	196 887 18323	196 824	613 196 809	196 671
cumulative Report of the Council of	Supply ectory (including 10% Non-Implementation Rate) mpetions (all sites) mpletions (all sites) - 10% Non-implementation Rate Applied wance ed Completions (with 10% Non implementation rate applied and windfall) + Actual completions (with 10% Non implementation rate applied and windfalls) ing Target ortfall Annualised over Plan Period		1331	451	2409	3113	581 581 3694 790 32	1093 1093 4787 790 32	1628 1628 6415 790 32	196 1021 7436 790 32	196 1567 9002 790 32	196 1439 10441 790 32	196 1049 11490 790 32	196 1011 12501 790 32	196 945 13446 790 32	196 987 14433 790 32	196 965 15397 790 32	196 1106 16503 790 32	196 932 17435 790	196 887 18323 790	196 824 19147 790	613 196 809 19956 790	196 671 20627 790
umulative Rever/Under Statiled Trajected Corrojected Corvindfall Allowotal Projecteumulative Connual Housinherited Shounnual Target	Supply ectory (including 10% Non-Implementation Rate) mpetions (all sites) mpletions (all sites) - 10% Non-implementation Rate Applied wance ed Completions (with 10% Non implementation rate applied and windfall) + Actual completions (with 10% Non implementation rate applied and windfalls) ing Target ortfall Annualised over Plan Period et (Inclusive of Shortfall)		1331 1331 822	451 1782 2 822	2409 822	3113 822	581 581 3694 790 32 822	1093 1093 4787 790 32 822	1628 1628 6415 790 32 822	196 1021 7436 790 32 822	196 1567 9002 790 32 822	196 1439 10441 790 32 822	196 1049 11490 790 32 822	196 1011 12501 790 32 822	196 945 13446 790 32 822	196 987 14433 790 32 822	196 965 15397 790 32 822	196 1106 16503 790 32 822	196 932 17435 790	196 887 18323 790	196 824 19147 790	613 196 809 19956 790	196 671 20627 790
cumulative Report of the Control of	Supply ectory (including 10% Non-Implementation Rate) mpetions (all sites) mpletions (all sites) - 10% Non-implementation Rate Applied wance ed Completions (with 10% Non implementation rate applied and windfall) + Actual completions (with 10% Non implementation rate applied and windfalls) ing Target ortfall Annualised over Plan Period et (Inclusive of Shortfall) unnual Target (Inclusive of Shortfall)		1331 1331 822 822	451 1782 2 822 2 1644	2409 822 2466	3113 822 3288	581 581 3694 790 32 822 4110	1093 1093 4787 790 32 822 4932	1628 1628 6415 790 32 822 5754	196 1021 7436 790 32 822 6576	196 1567 9002 790 32 822 7398	196 1439 10441 790 32 822 822	196 1049 11490 790 32 822 9042	196 1011 12501 790 32 822 9864	196 945 13446 790 32 822 10686	196 987 14433 790 32 822 11508	196 965 15397 790 32 822 12330	196 1106 16503 790 32 822 13152	196 932 17435 790 790 13942	196 887 18323 790 790 14732	196 824 19147 790 790 15522	613 196 809 19956 790 790 16312	196 671 20627 790 790 17102
Cumulative Report of Trajected Converted Converted Converted Converted Converted Converted Show and Target Cumulative Accumulative Accu	Supply ectory (including 10% Non-Implementation Rate) mpetions (all sites) mpletions (all sites) - 10% Non-implementation Rate Applied wance ed Completions (with 10% Non implementation rate applied and windfall) + Actual completions (with 10% Non implementation rate applied and windfalls) ing Target ortfall Annualised over Plan Period et (Inclusive of Shortfall) unnual Target (Inclusive of Shortfall) Supply of Housing (calc = Cumulative completions - cumulative annual target)		1331 1331 822	451 1782 2 822 2 1644	2409 822 2466	3113 822	581 581 3694 790 32 822	1093 1093 4787 790 32 822	1628 1628 6415 790 32 822	196 1021 7436 790 32 822	196 1567 9002 790 32 822	196 1439 10441 790 32 822	196 1049 11490 790 32 822	196 1011 12501 790 32 822	196 945 13446 790 32 822	196 987 14433 790 32 822	196 965 15397 790 32 822	196 1106 16503 790 32 822	196 932 17435 790	196 887 18323 790 790 14732	196 824 19147 790	613 196 809 19956 790	196 671 20627 790
cumulative Report June 18 Detailed Traje Projected Convindfall Allow Cotal Projected Cumulative Communal Housin Inherited Shound Target Cumulative A Deer/Under State Projected Cumulative A Deer/Under State	Supply ectory (including 10% Non-Implementation Rate) mpetions (all sites) mpletions (all sites) - 10% Non-implementation Rate Applied wance ed Completions (with 10% Non implementation rate applied and windfall) + Actual completions (with 10% Non implementation rate applied and windfalls) ing Target ortfall Annualised over Plan Period et (Inclusive of Shortfall) unnual Target (Inclusive of Shortfall)		1331 1331 822 822	451 1782 2 822 2 1644	2409 822 2466	3113 822 3288	581 581 3694 790 32 822 4110 -416	1093 4787 790 32 822 4932 -145	1628 6415 790 32 822 5754 661	196 1021 7436 790 32 822 6576 860	196 1567 9002 790 32 822 7398 1604	196 1439 10441 790 32 822 822	196 1049 11490 790 32 822 9042	196 1011 12501 790 32 822 9864	196 945 13446 790 32 822 10686	196 987 14433 790 32 822 11508	196 965 15397 790 32 822 12330	196 1106 16503 790 32 822 13152	196 932 17435 790 790 13942	196 887 18323 790 790 14732	196 824 19147 790 790 15522	613 196 809 19956 790 790 16312	196 671 20627 790 790 17102
umulative Report June 18 June	Supply ectory (including 10% Non-Implementation Rate) mpetions (all sites) mpletions (all sites) - 10% Non-implementation Rate Applied wance ed Completions (with 10% Non implementation rate applied and windfall) + Actual completions (with 10% Non implementation rate applied and windfalls) ing Target ortfall Annualised over Plan Period et (Inclusive of Shortfall) unnual Target (Inclusive of Shortfall) Supply of Housing (calc = Cumulative completions - cumulative annual target) ing Land Supply Position		1331 1331 822 822	451 1782 2 822 2 1644	2409 822 2466	3113 822 3288	581 581 3694 790 32 822 4110 -416	1093 1093 4787 790 32 822 4932 -145	1628 1628 6415 790 32 822 5754 661	196 1021 7436 790 32 822 6576 860	196 1567 9002 790 32 822 7398 1604	196 1439 10441 790 32 822 822	196 1049 11490 790 32 822 9042	196 1011 12501 790 32 822 9864	196 945 13446 790 32 822 10686	196 987 14433 790 32 822 11508	196 965 15397 790 32 822 12330	196 1106 16503 790 32 822 13152	196 932 17435 790 790 13942	196 887 18323 790 790 14732	196 824 19147 790 790 15522	613 196 809 19956 790 790 16312	196 671 20627 790 790 17102
umulative Rever/Under Setailed Trajected Corrojected Corrojected Corrojected Projected Umulative Communal Housinherited Shommunal Targetumulative Activer/Under Syear Housin Office Buffer umulative Targetumulative Targetumu	Supply ectory (including 10% Non-Implementation Rate) mpetions (all sites) mpletions (all sites) - 10% Non-implementation Rate Applied wance ed Completions (with 10% Non implementation rate applied and windfall) + Actual completions (with 10% Non implementation rate applied and windfalls) ing Target ortfall Annualised over Plan Period et (Inclusive of Shortfall) unnual Target (Inclusive of Shortfall) Supply of Housing (calc = Cumulative completions - cumulative annual target) ing Land Supply Position	c	1331 1331 822 822	451 1782 2 822 2 1644	2409 822 2466	3113 822 3288	581 581 3694 790 32 822 4110 -416	1093 4787 790 32 822 4932 -145	1628 6415 790 32 822 5754 661	196 1021 7436 790 32 822 6576 860	196 1567 9002 790 32 822 7398 1604	196 1439 10441 790 32 822 822	196 1049 11490 790 32 822 9042	196 1011 12501 790 32 822 9864	196 945 13446 790 32 822 10686	196 987 14433 790 32 822 11508	196 965 15397 790 32 822 12330	196 1106 16503 790 32 822 13152	196 932 17435 790 790 13942	196 887 18323 790 790 14732	196 824 19147 790 790 15522	613 196 809 19956 790 790 16312	196 671 20627 790 790 17102

Appendix 2

AY Trajectory

EX/CYC/69 Details	ed housing Trajectory Updated (Housing Requirement 822 dpa/ 790 dpa OAN)	Total	1	Actual Co	mpletions																				
Base Date 1 April			2017/18			2020/21	2021/22	2022/23 20	023/24 2	024/25	2025/26	2026/27	2027/28 20	28/29 20	29/30 2	030/31 2	31/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	Post 2038	Not
1 Net housing com	npletions 2017-2021 Net housing completion	2927	1296	449	560	622																			
	Net Communal Establishment and Student Accommodation Completions	0	0	0																					
Total 2. Housing Allocate	ions Below 5ha (H Sites)	2927	1296	449	560	622																			+
8																									Dev
H1a&b	Former Gas Works, 24 Heworth Green (National Grid Properties)	607	,							199	96		312												is or
112000	Torrier das Horiz, 24 renorm dicen (national dia Properties)	307																							Out
Н3	Bumholme School	83									35	35	13												star
H5	Lowfield School	159							85	71	3														Star
H7	Bootham Crescent	93							15	35	35	8													Full
H8	Askham Park & Ride	60											35	25											No e
H10	The Barbican	187	,										187												Site
H20	Former Oakhaven EPH	56											35	21											No e
													35	35	21										Site
H29	Land at Moor Lane Copmanthorpe	91																							den
H31	Eastfield Lane Dunnington	78	3						35	35	8														date
н38	Land RO Rufforth Primary School Rufforth	21							21																Site 23/2
H39	North of Church Lane Elvington	32											17	15											No
H46	Land to the North of Willow Bank and East of Haxby Road, New Earswick	117							35	35	35	12													Site
H52	Willow House, EPH, 34 Long Close Lane	15									15														No e
H53	Land at Knapton Village	0																							fron
													20												Site
H55 H56	Land at Layerthorpe Land at Hull Road	20 69					60						20												achi No d
H58	Clifton Without Primary School	25					69						15	10											No e
Total	Annualised requirements to the right.	1713					69	0	191	375	227	55	669	106	21	0	0	0	C) c	0	0	0		0
3. Housing Allocat	ions Projected Completions Above 5 ha (ST Sites)			_													_			1					-
													150	150	150	150	150	150	150	50					Outl site.
ST1a	British Sugar/ Manor School	1100																							First
ST1b	Manor School	100										35	35	30											Part
ST2	Former Civil Service Sports Ground Millfield Lane	266							48	48	48	48	48	26											Site
312	Former Civil Service Sports Ground Willineld Lane	200																							Full
ST4	Land Adj. Hull Road and Grimston Bar	249											41	41	41	41	41	44							com
ST5	York Central	2500							45	107	107	107	107	119	119	119	119	143	143	143	143	143	143	69	93 No (
ST7	Land East of Metcalfe Lane	845											35	35	70	70	70	70	70	70	70	70	70	14	No e
													25	70	70	70	105	105	105	105	105	105	95		App
ST8	Land North of Monks Cross	970											33	70	70	70	103	103	10.	10.	103	103	33		so fi
	Land North of Haxby	735											35	35	35	70	70	70	70	70	70	70	70	7	70 No e
ST14	Land to West of Wigginton Road	1453											35	70	105	105	105	105	109	105	105	105	105	40	03 No e
															35	70	105	105	105	140	190	190	190	207	79 No e
	Land to West of Elvington Lane	3209																							signi
ST16 ST16	Terrys Extension Site - Terrys Clock Tower (Phase 1) Terrys Extension Site - Terrys Car Park (Phase 2)	22 33						10	12	10															Pha:
ST16	Terrys Extension Site - Land to rear of Terrys Factory (Phase 3)	56							18	17	21														No C
ST17	Nestle South (Phase 1)	279						35	244																No 0
										50	50	50	50	50	F2										Phas
ST17	Nestle South (Phase 2)	302								30	50	30	50	30	32										char
													35	35	35	35	18								Site
ST31	Land to the South of Tadcaster Road, Copmanthorpe	158																							not (
											196		221												plan
ST32	Hungate (Phases 5+) (Blocks D&H)	417																							year
ST33	Station Yard Wheldarke												35	35	35	35	7								Site year
	Imphal Barracks, Fulford Road																	100	100	100	100	100	100	16	9
Annualised Project	ted Completion for ST Sites (CYC Trajectory)	12694					0	45	384	238	422	240	862	696	747	765	790	892	848	848	783	783	783	355	9
4. Projected Housi Total	ing Completions from Non Allocated Unimplemented Consents	1853					298	459	543	112	222	65	65	65	23	0	0		C) () (0	0		
	ing Completions From Communal Establishments/ Student Accommodation	1033					230	433	543	112	223	- 03	0.5		23	,	0						U		
Total		0					0	0	0	0	0	0	0	0	0	0	0	0	C) () (0	0		
Supply Trajectory Actual Net Comple			1296	449	560	622																			
Projected Comple			1236	443	500	022	367	504	1118	725	872	360	1596	867	791	765	790	892	848	848	783	783	783		
Windfalls							0	0	0	0	0	0	0	120	120	120	120	120	120		120	120	120		
Cumulative Comp	Completions (inc Windfall Allowance) letions (including Windfalls)		1296	1745	2305	2927	367 3294	504 3798	1118 4916	725 5641	872 6513		1596 8469	987 9456	911 10367	885 11252	910 12162	1012 13174	968 14142						
Requirement (790	pa plus 32 under supply) 822dpa		822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	822	790	790	790	790	790		
Cumulative Requi			822 474	1644 101			4110 -816	4932 -1134	5754 -838	6576 -935	7398 -885		9042 -573	9864 -408	10686 -319	11508 -256	12330 -168	13152	13942						
	y (including 10% Non-Implementation Rate)		474	101	-101	-301	-010	1154	-036	-935	-003	.1347	.5/3	400	313	-230	-100	22	200	3/6	431	004	,1/		
Projected Compet	ions (all sites)						367	504	1118	725	872	360	1596	867	791	765	790	892	848				783		
Projected Comple Windfall Allowand	tions (all sites) - 10% Non-implementation Rate Applied	600					330.3	453.6 0	1006.2	652.5 0	784.8 0	324	1436.4	780.3 120	711.9 120	688.5 120	711 120	802.8 120	763.2 120	763.2	704.7	704.7	704.7 120		
Total Projected Co	empletions (with 10% Non implementation rate applied and windfall) + Actual completions 2017-2021	300	1296	449			330.3	453.6	1006.2	652.5	784.8			900.3	831.9	808.5	831	922.8	883.2		824.7	824.7			
	etions (with 10% Non implementation rate applied and windfalls)		1296	1745	2305	2927	3257.3	3710.9	4717.1	5369.6	9002			11662.7	12494.6	13303.1	15397								
Annual Housing Ta Inherited Shortfal	I Annualised over Plan Period						790 32	790 32	790 32	790 32	790 32	790 32	790 32	790 32	790 32	790 32	790 32	790 32		790	790	790	790		
Annual Target (Inc	clusive of Shortfall)		822	822			822	822	822	822	822	822	822	822	822	822	822	822	790				790		
Over/Under Suppl	ıl Target (Inclusive of Shortfall) y of Housing (calc = Cumulative completions - cumulative annual target)		822 474	1644 101			4110 -852.7	4932 -1221.1	5754 -1036.9	6576 -1206.4	7398 1604	8220 1106	9042 1720.4	9864 1798.7	10686 1808.6	11508 1795.1	12330 3067	13152 3167.8							
	nd Supply Position		4/4	101	-101	-301	-032./	-1221.1	-1030.3	-1200.4	1004	1106	1/20.4	1/30./	1000.0	1/33.1	3007	3107.8	3281	. 3391	3023.7	3000.4	3093.1		
20% Buffer							164	164	164	164	164														
							986	1973	2959	3946	4932														
Cumulative Target Over/Under Suppl	y of Housing (with non-inp rate applied) Compared to cumulative annual target						-655.7	-1188.1	-1167.9	-1501.4	-1702.6														

Developers promoting. Detailed planning permission in place for two phases of development (both apartment schemes) – total 295 dwellings. Remainder of site soccupied by Gas Holder. No detailed scheme for this part of site. Remainder of scheme not demonstrably deliverable. Adjust trajectory down to 295 homes in year period. Assume balance post-5 years. Dutline planning permission granted for 83 dwellings but site still owned by CYC. Steps needing to be taken before first homes can be delivered indicate that tart date should be pushed back to 25/26. tart date pushed back to reflect more realistic lead in.

ull planning permission in place and housebuilder in place to deliver. Start date pushed back to reflect work that needs to be completed before homes can be Full planning permission in place and housebuilder in place to deliver. Start date pushed back to reflect work that needs to be completed before homes can be delivered including obtaining technical approvals, demolition and site clearance). No evidence of site being suitable, available and achievable. Not demonstrably deliverable. Start date pushed back beyond 5 years. Site benefitted from a full planning permission granted in 2017 (after 4 year determination period). That has since expired. No new application submitted. Site not demonstrably deliverable. Start date pushed back beyond 5 years.

No evidence of site being suitable, available and achievable. Not demonstrably deliverable. Start date pushed back beyond 5 years.

Site is in Green Belt. Live planning application under consideration but application has been with CYC since 2019 and VSC issues remain unresolved. Site not demonstrable deliverable. Start date pushed back beyond 5 years.

Site subject to resolution to grant full planning permission. S106 Agreement pending. Little / no prospect of homes being delivered within 12 months so start date nuched has for 27/24. ate pushed back to 23/24.

te subject of live application for full planning permission for 21 dwellings. Application by housebuilder. Assume all 21 dwellings capable of being delivered in 23/24.

No evidence of site being suitable, available and achievable. Not demonstrably deliverable. Start date pushed back beyond 5 years.

Site subject of live planning application for 117 dwellings.

No evidence of site being suitable, available and achievable. Not demonstrably deliverable. Start date pushed back beyond 5 years.

Planning permission for 4 dwellings refused in 2016. No evidence of site being suitable, available and achievable. Not demonstrably deliverable. Site removed from traiertory. rom trajectory.

Ite not the subject of development proposals and currently occupied by several independent businesses. No evidence of site being suitable, available and chievable. Not demonstrably deliverable. Start date pushed back beyond 5 years

No comment.

No evidence of site being suitable, available and achievable. Not demonstrably deliverable. Start date pushed back beyond 5 years. rt of ST1a. Should not have a separate line in the trajectory. benefits from full planning permission but work on discharge of conditions / scheme details is continuing. Unlikely that site will deliver homes 22/23 so ectory pushed back 12 months. Il planning applications (x2) for a total of 249 dwellings submitted in 2015. Applications remain undetermined. Site not demonstrably deliverable. First year of to evidence of site being suitable, available and achievable. Not demonstrably deliverable. Start date pushed back beyond 5 years.

pplication for outline planning permission submitted in 2018. Appeal heard at Public Inquiry earlier this year. Site not demonstrably suitable or achievable and

of first year of completions pushed back beyond 5 years. evidence of site being suitable and achievable. Not demonstrably deliverable. Start date pushed back beyond 5 years. evidence of site being suitable and achievable. Not demonstrably deliverable. Start date pushed back beyond 5 years. evidence of site being suitable and achievable. Developer's advisers have indicated first dwellings on ST15 not likely until after 5 years and appears to be inflicant disagreement in respect of form of development that should be delivered. Not demonstrably deliverable. Start date pushed back beyond 5 years.

ase 2 – Adjustment to dwelling numbers to reflect latest planning permission and minor adjustment to start date to reflect delay incurred as consequence hanges to scheme.

Ite subject of live application for outline planning permission. Application was submitted in 2018 and remains undetermined and with issues unresolved. Site of demonstrably suitable or achievable. Date of first year of completions pushed back beyond 5 years.

ull planning permission for 196 apartments (Block D) not implemented and will expire October 2022. Revised proposals for Block H were the subject of new fur lanning application in 2021. Application undetermined. Development not demonstrably achievable. Date of first year of completions pushed back beyond 5

ears. te subject of live application for full planning permission but application not yet determined and so development not demonstrably deliverable. Date of fir.

ear of completions pushed back beyond 5 years.

Contact details

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Avison Young