



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

Matter 5: Housing Land Supply (Addendum)

May 2022

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

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Status: Draft

Draft date: 24 May 2022

For and on behalf of Avison Young (UK) Limited

1. Introduction

- 1.1 On 16 May 2022, the Council issued two documents as follows:
 - a) a Housing Land Supply Update (EX/CYC/76); and
 - b) a Windfall Update Technical Paper (EX/CYC/77).
- 1.2 The Housing Land Supply Update contained: housing completions data for the 2021 / 22 monitoring year; a revised housing trajectory; revised 5 year land supply calculations and tables containing basic details of the unallocated sites that benefit from planning permission and are factored into the Council's calculations as a component of its forward supply. So far as we can tell, this is the first time the Council has published details of the unallocated sites that have planning permission.
- 1.3 The Windfall Update Technical Paper updates the Council's windfalls evidence to a 31 March 2022 base.
- 1.4 During the EiP Hearing Session on Matter 5 on 17 May 2022, Mr Alsbury, appearing for DIO, drew to the Inspectors' attention a number of concerns that DIO had about the Council's housing trajectory (including about the deliverability of a number of sites that it has assumed will deliver new homes within the next 5 years)¹ and noted that, notwithstanding the Council's update, concerns remained. It was agreed that DIO should summarise these in a further written submission, rather than describe them during the Hearing Session.
- 1.5 At the start of the Hearing Session into Matter 7, on 18 May 2022, the Council opened up the invitation to make written submissions on its updates to all interested parties, and asked for these to be submitted by 26 May 2022.
- 1.6 This Addendum contains DIOs further comments on two matters:
 - a) the deliverability of sites that, in the Council's updated trajectory, are forecast to deliver new homes in the 5 year period 2022 2027; and
 - b) the 5 year housing land supply calculation, which DIO has recast in the light of (a) and the Council's updates.
- 1.7 To assist the Inspectors, DIO deals with (a) by way of two modified versions of the Council's trajectory which are included in Appendices 1 and 2 to this Addendum. In each instance where DIO has adjusted the trajectory, either to reflect the fact that a site is not deliverable or where it has been necessary to amend lead-in times, we provide an explanation as to why. The land supply calculations which flow from the adjustments that we have made, and consider necessary, appear below.
- 1.8 It is important to note that DIOs analysis of the Council's trajectory is based on publicly available data, including planning history records and the Council's SHLAA update from May 2021. We have noted in both our Representations to the Plan and our Matter 5 Statement that there is a lack of evidence underpinning the assumptions that the Council has made about the deliverability of the sites in its trajectory. Unfortunately, the Council's updates do not address this important evidential gap. We heard, during the Hearing Session on 17 May, that the Council can and will produce site specific material as a response to this and other written submissions made on Matter 5. It is a significant concern that this information has not already been made available and that it is only now being offered as some kind of rebuttal to issues being raised by Representors. As Mr Alsbury noted when

¹ All documented in DIO's Matter 5 Hearing Statement

this offer was made by the Council, it will be important that any site specific material provided by the Council does not simply report land owner, promoter or developer expectations / ambitions / objectives but properly explains why the site is deliverable and, if it meets the 'suitable' and 'available' tests, how it is that the site will be progressed from whatever current status it has to the point it yields its first homes. This means providing a detailed and robust commentary on the lead in period, including the timescales associated with: any disposal (if the site is not already owned by a housebuilder); the preparation of an application for planning permission (and whether outline, hybrid of full); the determination period; the settling of any S106 Agreement; the preparation and determination of applications for the approval of Reserved Matters; the discharge of precommencement and pre-occupation conditions; the gaining of technical approvals (e.g. roads and sewers); the delivery of any up front infrastructure that is likely to be required (if any); and the preparation of the site for construction. Without such information, it will not be possible to determine whether the assumptions that the Council has made are sound.

2. The Policy Context

2.1 The NPPF provides that:

"To boost significantly the supply of housing, local planning authorities should:

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs
 for market and affordable housing in the housing market area, as far as is consistent with the
 policies set out in this Framework, including identifying key sites which are critical to the delivery
 of the housing strategy over the plan period;
- <u>identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;</u>
- <u>identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;</u>
- for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target..." (paragraph 47) (our emphasis)
- 2.2 The NPPF defines 'deliverable' housing sites as sites that are:

"available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans." (paragraph 47, Footnote 11)

2.3 The NPPF goes on to state 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." (paragraph 47, Footnote 12)

2.4 The 2014 version of the NPPG provides the following guidance on assessing whether a site is suitable:

"Plan makers should assess the suitability of the identified use or mix of uses of a particular site or broad location including consideration of the types of development that may meet the needs of the community. These may include, but are not limited to: market housing, private rented, affordable housing, people wishing to build their own homes, housing for older people, or for economic development uses.

Assessing the suitability of sites or broad locations for development should be guided by:

- the development plan, emerging plan policy and national policy;
- market and industry requirements in that housing market or functional economic market area.....
- ...In addition to the above considerations, the following factors should be considered to assess a site's suitability for development now or in the future:
- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous
- risks, pollution or contamination;
- potential impacts including the effect upon landscapes including landscape features, nature and heritage
- conservation;
- appropriateness and likely market attractiveness for the type of development proposed;
- contribution to regeneration priority areas;
- environmental/amenity impacts experienced by would be occupiers and neighbouring areas."
 (paragraph ID 3-019-20140306)
- 2.5 Insofar as 'availability' is concerned, it provides as follows:

"A site is considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell. Because persons do not need to have an interest in the land to make planning applications, the existence of a planning permission does not necessarily mean that the site is available. Where potential problems have been identified, then an assessment will need to be made as to how and when they can realistically be overcome. Consideration should also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions." (paragraph ID 3-020-20140306)

2.6 As regards, 'achievable', its states that:

"A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period." (paragraph ID 3-021-20140306)

2.7 DIO has examined the Council's housing trajectory with all of the above in mind.

3. The Housing Requirement

- 3.1 The starting point when assessing an Authority's housing land supply is the housing requirement for the 5 year period in question. This is made up of:
 - a) the annual housing requirement specified in the Local Plan;
 - b) any shortfall (or a percentage of any shortfall see below) that has been amassed in the light of under-delivery experienced in the Plan period to date; and
 - c) the necessary buffer (whether 5% or 20%).
- 3.2 In this instance, there is considerable dispute in respect of (a) with a significant number of Representors arguing, and evidencing, that the Council's baseline housing requirement should be significantly higher than is being claimed by the Council. However, for the purposes of this Addendum, we have assumed that the Council's baseline figure of 822dpa is sound. Clearly, if the housing requirement is fixed at a higher level, and additional sites are not allocated for development, then the housing land supply will be worse than currently calculated.
- 3.3 As regards (b), the Council's Housing Land Supply Update paper indicates that a total of 3,767 net new homes have been delivered in the Plan period to date (i.e. 2017 2022) against a requirement of 4,110, leaving a shortfall of 343 homes. However, it has included within its calculations 438 dwellings which derive from the delivery of student accommodation and communal establishments. As noted in our main Matter 5 Statement, DIO has a fundamental objection to these units being included in the Council's completions data. There is absolutely no local evidence of purpose-built student accommodation and communal establishments freeing up market housing, or safeguarding market housing from conversion. Accordingly, the Council's starting point is wrong. The shortfall to date amounts to **781** and not 343. That said, and for completeness only, we provide versions of our housing land supply calculations below which both exclude and include this element of the Council's completions data.
- 3.4 There are two ways in which the shortfall may possibly be dealt with, either fully in the next 5 years (Sedgefield), or over the remaining Plan period (Liverpool). In its Housing Land Supply Update paper (and previous submissions), the Council adopts the Liverpool approach and spreads the shortfall evenly over each of the remaining years of the Plan period. For the reasons we have expressed previously, we do not consider that this accords with the provisions of the NPPF or the NPPG. Helpfully, we note that, during the Matter 5 Hearing Session, the Council accepted that it could accommodate either approach. With this in mind, we would expect the Inspectors to now favour the Sedgefield approach so as to ensure that the consequences of past under performance are addressed as quickly as possible. However, again for completeness, we provide two versions of our calculations below, one set which adopt the Sedgefield approach and another which use the Liverpool approach.
- 3.5 As regards (c), there appears to be broad agreement that York is an Authority that has persistently under-delivered in housing terms and, accordingly, a 20% buffer must be applied.

3.6 With all of the above in mind, the housing requirement for the first 5 years post adoption of the Plan² is calculated as follows:

Five Year Housing Requirement – Sedgefield and Student Accommodation Completions Omitted

a)	Requirement 2017 – 2022	4,110
b)	Completions 2017 – 2022	3,329
c)	Shortfall	781
d)	Shortfall to be Delivered in 5 years	781
e)	5 Year Requirement (excl. Shortfall)	4,110
f)	Requirement with Shortfall Added	4,891
g)	Buffer to be Added (20% of (e))	978
h)	Requirement with Buffer Added	5,869
i)	Requirement Annualised	1,173

Five Year Housing Requirement – Liverpool with Student Accommodation Completions Omitted

a)	Requirement 2017 – 2022	4,110
b)	Completions 2017 – 2022	3,329
c)	Shortfall	781
d)	Shortfall to be Delivered in 5 years (5 x (C/11))	355
e)	5 Year Requirement (excl Shortfall)	4,110
f)	Requirement with Shortfall Added	4,465
g)	Buffer to be Added (20% of (e))	893
h)	Requirement with Buffer Added	5,358
i)	Requirement Annualised	1,072

² Note: during the Matter 5 Hearing Session, Mr Alsbury highlighted that the Council's 5 year land supply calculations run from 2022 and that, if the Plan is adopted in the 2023 / 24 monitoring year (as seems likely), the 5 year land supply calculation will need to be run from 2023/24 with assumed completions data for 2022/23 and a further adjusted trajectory which removes from the first 5 years any / all sites that are not demonstrably deliverable.

Five Year Housing Requirement – Sedgefield with Student Accommodation Completions Included (Not DIO preferred)

Five Year Housing Requirement – Liverpool with Student Accommodation Completions Included (Not DIO preferred)

a)	Requirement 2017 – 2022	4,110
b)	Completions 2017 – 2022	3,767
c)	Shortfall	343
d)	Shortfall to be Delivered in 5 years (5 x (C/11))	156
e)	5 Year Requirement	4,110
f)	Requirement with Shortfall Added	4,266
g)	Buffer to be Added (20% of (e))	853
h)	Requirement with Buffer Added	5,119
i)	Requirement Annualised	1,024

4. The 5 Year Land Supply Calculation

4.1 As noted in Section 1 above, we have examined the Council's revised housing trajectory and have identified a number of issues with the sites that it is assuming will deliver homes with the next 5 years. There are 10 sites that we do not believe satisfy the relevant tests and so are not 'deliverable'.

For each of these, we have adjusted the trajectory so that new homes are not forecast to be delivered within the next 5 years. There are also an additional 9 sites in respect of which we believe the Council has taken an overly optimistic view in respect of the time that it will take for each to begin delivering dwellings. We have made appropriate adjustments to the trajectories for these sites also.

- 4.2 Appended to this Statement are two DIO versions of the Council's housing trajectory. One (Appendix 1) retains the student accommodation and communal establishments data that the Council has included in its trajectory (for completions and forecast supply amounting to 977 dwellings in total). The other (Appendix 2) removes student accommodation and communal establishments from the trajectory. As noted earlier in this Statement, and in our main Matter 5 Statement, it is this latter version of the trajectory that DIO considers to be sound.
- 4.3 We have not adjusted the supply that the Council is forecasting will derive from 'non-allocated sites with planning permission' but we have checked all of the permissions for these sites and note that a not insignificant number of the permissions have expired. Once corrected by the Council, we expect its supply from this source to reduce by just under 90 dwellings.
- 4.4 The DIO trajectories forecast that either 4,404 or 3,865 new dwellings (including / excluding student accommodation and communal establishments) will be constructed in York over the next 5 years. These figures exclude windfalls. If the Council's latest windfall allowance is factored in for years 4 and 5, as per the Council's trajectory, the supply increases to 4,802 or 4,263. It is these numbers that we have used in the calculations that appear below, notwithstanding the fact that we remain of the view that 199dpa is not a sound windfall figure.
- 4.5 We have fed the DIO supply data into a series of 5 year land supply calculations and these appear below. For each, we have calculated the deliverable supply with and without a discount for non-implementation. Where this has been applied, we have used a rate of 10% consistent with the Council's trajectory. The results are as follows:

Five Year Housing Land Supply - Sedgefield with Student Accommodation Omitted

- 1	Deguirement 2012 2027	T 000
a)	Requirement 2012 – 2027	5,869
b)	Requirement Annualised	1,173
c)	Deliverable Supply	4,263
d)	Supply in Years without NI Discount	3.63
e)	Supply in Years with NI Discount Applied	3.27

Five Year Housing Land Supply - Liverpool with Student Accommodation Omitted

a)	Requirement 2012 – 2027	5,358
b)	Requirement Annualised	1,072
c)	Deliverable Supply	4,263
d)	Supply in Years without NI Discount	3.98

e)	Supply in Years with NI Discount Applied	3.58

Five Year Housing Land Supply - Sedgefield with Student Accommodation Included (Not DIO Preferred)

a)	Requirement 2012 – 2027	5,344
b)	Requirement Annualised	1,069
c)	Deliverable Supply	4,802
d)	Supply in Years without NI Discount	4.49
e)	Supply in Years with NI Discount Applied	4.04

Five Year Housing Land Supply – Liverpool with Student Accommodation Included (Not DIO Preferred)

a)	Requirement 2012 – 2027	5,119
b)	Requirement Annualised	1,024
c)	Deliverable Supply	4,802
d)	Supply in Years without NI Discount	4.69
e)	Supply in Years with NI Discount Applied	4.22

5. Conclusions

- In our main Matter 5 Hearing Statement, we highlighted a large number of issues with the Council's housing trajectory and its 5 year land supply. We have updated our analysis in the light of the amended information that the Council published on 16 May and, in doing so, have identified a similar number of problems. The trajectory contains a large number of sites that are not demonstrably deliverable and so should not be shown as contributing new dwelling completions in the next 5 years (or within 5 years from adoption of the Plan if that happens in the 2023/24 monitoring year). We have adjusted the trajectory for each of these sites and the net effect is a not insubstantial reduction in the available supply for the period to 2027. There are also issues with some of the assumptions that the Council has made about development lead-in times. When these issues corrected, the forecast supply in the next 5 years reduces further. All of the adjustments that we have made to the Council's trajectory are captured in the attached spreadsheets.
- 5.2 We have run a suite of 5 year land supply calculations applying both the Sedgefield and Liverpool approaches to dealing with the shortfall, and including / excluding student accommodation and communal establishments. We have also included windfalls at the Council's preferred rate (in spite of us being of the firm view that a windfall allowance of 199dpa is not sound) and have both included and excluded a discount for non-implementation. As regards non-allocated sites with planning

permission, we have left the Council's figures unaltered but have noted that about 90 of the dwellings that sit within this part of the forward supply no longer have planning permission. These should be removed from the supply by the Council.

- 5.3 In all of the calculations that we have run, there is less than 5 years' worth of deliverable housing sites. Indeed, the calculation that DIO considers to sound indicates that the Plan is providing for only a supply of 3.27 years' worth of deliverable housing sites. This is not acceptable and renders the Plan unsound.
- 5.4 Of course, the supply issue can be rectified but only with the allocation of additional housing sites that are suitable for housing development now, available for housing development now and on which housing is achievable in the next 5 years.

Appendix 1

DIO Housing Trajectory with Student Accommodation Included

Detailed Housing Delivery Trajectory Update (Base Date 1 Ap	ril 2022) - DIO V	ersion wi	ith Stu	ıdent Δ	ccomr	modat	ion Inc	luded														
Secured Housing Servery Hajestory Spatte (Suse Suite 17)	Total	Actual	l Completi	ions						2026/27	2027/20	2020/20	2020/20	2020/24	2024/22	2022/22	2022/24	2024/25	2025/26	2026/27	2037/38 Post 2	DIO Comments on Deliverability
1. Net Housing Completions 2017 to 2021	2017/18	2018/19 2	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027128	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38 Post 2	138
Net Housing Completion Net Communal Establishment and Student Accommodation Completions (Ratios applied)	1296 35		560 67		402 252																	_
Total	1331		627	704	654																	
2. Housing Allocations Below 5 ha (H Sites)																						CYC assumes additional 392 in 5 year period. The 392 are proposed on land currently occupied by a
																						Gas Holder. There is no scheme for this part of the site. It is not demonstrably suitable or available for housing now and there is no evidence of housing being achievable on this part of the site within 5 years.
H1a & b Former Gas Works, 24 Heworth Green (National Grid Properties)	607	+		-+				215				392										Site is not deliverable. 392 dwellings deferred until later in the Plan period.
H3 Burnholme School	83								35	35	13											Site is owned by CYC. OPP granted by steps to be taken before first homes constructed eg site sale; RMs; discharge of conditions; technical approvals; site preparation. More appropriate to assume first
H5 Lowfield School	165					69	24		35	35	13											homes delivered 25/26 and revert to CYCs original delivery rates.
H7 Bootham Crescent	93	+		\rightarrow		25	35	33														No evidence of site being available for housing development now, or of housing being
																						achievable within 5 years. Site not deliverable. Defer assumed completions until later in the Plan period
H8 Askham Bar Park & Ride	60	+ +										35 187	25									CYC accepts that this site is not 'deliverable' and so has pushed it back in the trajectory. DIO have
H10 The Barbican H20 Former Oakhaven EPH	187 0	+		-								107										defferred it a further year in case 5 years is calcuated from 2023/24.
120 Forma Gandavar Er II																						Application for full planning permission lodged in March 2019. Application still undertermined. No clear
H29 Land at Moor Lane Copmanthorpe	92											2	40	50								evidence of housing being achievable within 5 years. Site not deliverable. Assumed completions deferred until later in the Plan period.
H31 Eastfield Lane Dunnington H38 Land RO Rufforth Primary School Rufforth	82 21	+ +		-		6	40 10	36 11														
Tido Eand to tuniour minary donor remorn	21						"	_ ··-														No evidence of site being available for housing development now, or of housing being achievable within
H39 North of Church Lane Elvington	32											17	15									5 years. Site not deliverable. Defer assumed completions until later in the Plan period.
H46 Land to North of Willow Bank and East of Haxby Road, New Earswick H52 Willow House EPH, 34 Long Close Lane	117 15						20	35	40 15	22												-
H53 Land at Knapton Village	4																					Plannig permission refused for a development of 4 dwellings. Site not sitable and nor is it demonstrable available or achievable. Site not deliverable or developable. Delete.
	20											20										Site is occupied by several businesses. It is not suitable or available now and there is no evidence of housing being achievable within 5 years. Site is not deliverable. Defer assumed completions until later
H55 Land at Layerthorpe	20											20										Site is owned by CYC. Not subject to a planning application. Site not adverstised for sale. Site is not demonstrably suitable or available and no evidence of housing being achievable within 5 years. Site is
H58 Clifton Without Primary school	15											15										not deliverable. Defer assumed completions until later in the Plan period.
Annualised Projected Completions H Sites (Hide) 3. Housing Allocations Above 5 ha (ST Sites)						100	129	330	90	57	13	668	80	50	0	0	0	0	0	0	0	-
or reading random value of the (or order)																						OPA submitted in 2015. OPP granted on apeal in 2018. Subsequent approvals granted for infrastructure. Site remains in hands of British Sugar. It is not available now and there is no evidence of
																						housing being achievable within 5 years. Matter 5 Hearing Statement by Rapleys on behalf of British Sugar does not explain or evidence the development implementation process and the timescales
ST1a British Sugar/Manor School	1100											150	150	150	150	150	150	150	50			associated with each stage. CVC SHLAA update 2021 noted that site should not be included in the 5 year housing land supply. Site may only be included if there is evidence of it being available now and it
																						is clear that housing is achievable within the next 5 years. Site not deliverable. Defer assumed completions until later in the Plan period.
ST1b Manor School	100											35	35	30								Forms part of ST1. Defer assumed completions until later in the Plan period.
																						Site has full planning permission but developer (Miller Homes) is replanning elements of the scheme. One such proposal has been rejected and an amended set of proposals were lodged earlier this year.
ST2 Former Civil Service Sports Ground Millfield Lane	263						53	78	52	50	30											That application is pending determination. Delivery of first homes deferred 12 months to reflect delays being incurred.
																						Application for full plannig permission submitted in January 2015 (eventually validated in 2017) and remains undetermined. Site is within then general extent of the Green Belt. Officers are continuing to
ST4 Land Adj. Hull Road and Grimston Bar	211							35	40	40	40	40	16									seek further information from the applicants. Given the history of the current planning application, the
																						site is not demonstrably suitable and there is no evidence of housing being achievable within 5 years. Site is not deliverable. Defer assumed completions until later in the Plan period.
ST5 York Central ST7 Land East of Metcalfe Lane	2500 845	+						45	107 50	107 90	107 120	107 120	119 120	119 120	119 120	119 105	143	143	143	143	143 836	
OTT Early Early Chilliptering	0.0								"	- 55	1.20	.20	1.20	.20	120							Site has housebuilder involvement and is the subject of an appeal against the non-determination of an outline planning application submitted in 2018. The inspector has referred his Report to the SofS and
																						the Case Officer at PINS has indicated that a Decision will be issued on or before 16 June 2022. It s not clear how the appeal will be decided and whether the site will be found suitable for housing
ST8 Land North of Monks Cross	970							30	70	100	100	100	100	100	100	100	100	70				development. However, even if it is, and planning permission is granted in June, the trajectory still needs to be adjusted to reflect a more realistic lead-in time. With the need to secure RMs, discharge
																						conditions, secure technical approvals, deal with any residual land ownership issues, prep the site and delivery any infrastructure regired, first homes unlikely to be completed before the end of 2024 and
																						probably later. If planning permission refused in June, trajectory for this site will need a fundamental review in the light of the reasons for refusal.
		+		_																		Site has housebuilder involvement but there has been no application for planning permission and
ST9 Land North of Haxby	735										45	90	90	90	90	90	90	90	60			timescales for preparation of an application are unclear. Site is in Green Belt. If, say, hybrid application were to be submitted on adoption of the Plan, first homes could possibly be delivered in the 27/28
ST14 Land to West of Wigginton Road	1348	+									60	60	160	160	160	160	160	160	160	108		monitoring year. Trajectory adjusted to reflect this. As per ST9
ST15 Land to West of Elvington Lane	3339										35	70	105	105	105	140	210	210	280	280	280 1519	Trajectory for this site left as is on basis that first homes forecast outside the first 5 years. However, if
											35	/0	105	105	105	140	210	210	200	200	200 151:	satsify themselves that this site is deliverable and on the current evidence it is not.
ST16 Terrys Extension Site - Terrys Clock Tower (Phase 1) ST16 Terrys Extension Site - Terrys Car park (Phase 2)	21 0			\rightarrow		21																H
ST16 Terrys Extension Site - Land to rear of Terrys Factory (Phase 3) ST17 Nestle South (Phase 1)	0 279	+					279															
ST17 Nestle South (Phase 2)	302						273	35	35	35	35	35	35	35	35	22						
																						Site is being promoted for development by Gladman. Site is the subject of an outline planning applications that was submitted in 2018. There remain unresolved issues and it is not clear whether /
ST31 Land to the South of Tadcaster Road, Copmanthorpe	158										35	35	35	35	18							when these will be resolved. However, even if planning permission is granted on adoption of the Plan, the first new homes are unlikely to be delivered on this site before the latter part of 2027. Trajectory
ST32 Hungate (Phases 5+) (Blocks D & H)	375								196				179									adjusted to reflect this.
																						Site has housebuilder involvement. Application for full planning permission submitted in October 2021 but remains undertermined. Site is in the Green Belt. Assuming permission is granted on adoption of
ST33 Station Yard Wheldarke	150							7	35	35	35	38										the Plan, first homes unlikely to be delivered before the 24/25 monitoring year. Trajectory adjusted to reflect this.
ST36 Imphal Barracks, Fulford Road	769															100	100	100	100		100 169	
Annualised Projected Completions for ST Sites 4. Projected Housing Completions From Non Allocated Unimplemented Consents						21	332	230	585	457	642	880	1144	944	897	986	953	923	793	631	523 2524	
Total	1909					483	333	363	250	105	143	232	0	0	0	0	0	0	0	0	0	
5. Projected Housing Completions From Communal Establishments/Student Accommodation Total	539					385	26	128	0	0	0	0	0	0	0	0	0	0	0	0	0	
Supply Trajectory Actual Net Completions (2017 to 2022)	1331	451	627	704	654																	
Projected Completions (all sites) Windfalls						989	820	1051	925 199	619 199	798 199	1780 199	1224 199	994 199	897 199	986 199	953 199	923 199	793 199	631 199	523 199	
Projected Annual Housing Completions (Inc Windfall Allowance)				2011		989	820	1051	1124	818	997	1979	1423	1193	1096	1185	1152	1122	992	830	722	
Cumulative Completions (Including Windfalls) Over/Under Suppy	1331 509		2409 -57		3767 -343	4756 -176	5576 -178	6627 51	7751 353	8569 349	9566 524	11545 1681	12968 2282	14161 2653		16442 3290	17594 3620	-			21260 3998	
.,,	303																					

Appendix 2

DIO Housing Trajectory with Student Accommodation Excluded

Detail	ed Housing Delivery Trajectory Update (Base Date 1 Ap	ril 2022) - I	DIO Version	with Student	t Accom	nmodat	tion Excl	uded															
	, , , , , , , , , , , , , , , , , , , ,	Total	А	ctual Completions					2025/26 2	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	DIO Comments on Deliverability
	sing Completions 2017 to 2021 Net Housing Completion		1296 449																				
	Net Communal Establishment and Student Accommodation Completions (Ratios applied)		0 0		0																		
2. Housing	Allocations Below 5 ha (H Sites)		1200																				CYC assumes additional 392 in 5 year period. The 392 are proposed on land currently occupied by a
																							Gas Holder. There is no scheme for this part of the site. It is not demonstrably suitable or available for housing now and there is no evidence of housing being achievable on this part of the site within 5 years. Site is not deliverable. 392 dwellings deferred until later in the Plan period.
H1a & b	Former Gas Works, 24 Heworth Green (National Grid Properties)	607				-		215	+			392											Site is owned by CYC. OPP granted by steps to be taken before first homes constructed eg site sale;
	Burnholme School	83				ļ.,			35	35	13												RMs; discharge of conditions; technical approvals; site preparation. More appropriate to assume first homes delivered 25/26 and revert to CYCs original delivery rates.
	Lowfield School Bootham Crescent	165 93				69 25	24 35	33															
																							No evidence of site being available for housing development now, or of housing being achievable within 5 years. Site not deliverable. Defer assumed completions until later in the Plan period
	Askham Bar Park & Ride	60				1						35 187	25										CYC accepts that this site is not 'deliverable' and so has pushed it back in the trajectory. DIO have defferred it a further year in case 5 years is calcuated from 2023/24.
	The Barbican Former Oakhaven EPH	187 0																					
LIO	Land at Moor Lane Copmanthorpe	92										2	40	50									Application for full planning permission lodged in March 2019. Application still undertermined. No clear evidence of housing being achievable within 5 years. Site not deliverable. Assumed completions deferred until later in the Plan period.
H31	Earlied Lane Dunnington Land RO Rufforth Primary School Rufforth	82 21				6	40 10	36 11					40	30									
1130	Land NO National Fillinary School National	21					10																No evidence of site being available for housing development now, or of housing being achievable within 5 years. Site not deliverable. Defer assumed completions until later in the Plan period.
	North of Church Lane Elvington Land to North of Willow Bank and East of Haxby Road, New Earswick	32 117					20	35	40	22		17	15										,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
H52	Willow House EPH, 34 Long Close Lane	15							15														Plannig permission refused for a development of 4 dwellings. Site not sitable and nor is it demonstrable
	Land at Knapton Village	4																					available or achievable. Site not deliverable or developable. Delete. Site is occupied by several businesses. It is not suitable or available now and there is no evidence of
H55	Land at Layerthorpe	20										20											housing being achievable within 5 years. Site is not deliverable. Defer assumed completions until later Site is owned by CYC. Not subject to a planning application. Site not adverstised for sale. Site is not demonstrably suitable or available and no evidence of housing being achievable within 5 years. Site is
	Clifton Without Primary school d Projected Completions H Sites (Hide)	15				100	129	220	90	57	13	15 668	90	50	0	0		0	0	0	0		not deliverable. Defer assumed completions until later in the Plan period.
	Allocations Above 5 ha (ST Sites)					100	129	330	90	51	13	000	80	50	U	0	-	0	0	0	0		OPA submitted in 2015. OPP granted on apeal in 2018. Subsequent approvals granted for
																							infrastructure. Site remains in hands of British Sugar. It is not available now and there is no evidence of housing being achievable within 5 years. Matter 5 Hearing Statement by Rapleys on behalf of British
ST1a	British Sugar/Manor School	1100										150	150	150	150	150	150	150	50				Sugar does not explain or evidence the development implementation process and the timescales associated with each stage. CYC SHLAA update 2021 noted that site should not be included in the 5 year housing land supply. Site may only be included if there is evidence of it being available now and it
																							is clear that housing is achievable within the next 5 years. Site not deliverable. Defer assumed completions until later in the Plan period.
ST1b	Manor School	100										35	35	30									Forms part of ST1. Defer assumed completions until later in the Plan period. Site has full planning permission but developer (Miller Homes) is replanning elements of the scheme.
ST2	Former Civil Service Sports Ground Millfield Lane	263					53	78	52	50	30												One such proposal has been rejected and an amended set of proposals were lodged earlier this year. That application is pending determination. Delivery of first homes deferred 12 months to reflect delays
																							being incurred. Application for full plannig permission submitted in January 2015 (eventually validated in 2017) and
ST4	Land Adj. Hull Road and Grimston Bar	211						35	40	40	40	40	16										remains undetermined. Site is within then general extent of the Green Belt. Officers are continuing to seek further information from the applicants. Given the history of the current planning application, the site is not demonstrably suitable and there is no evidence of housing being achievable within 5 years.
ST5	York Central	2500						45	107	107	107	107	119	119	119	119	143	143	143	143	143		Site is not deliverable. Defer assumed completions until later in the Plan period.
	Land East of Metcalfe Lane	845							50	90	120	120	120	120	120	105		- 110					Site has housebuilder involvement and is the subject of an appeal against the non-determination of an
																							outline planning application submitted in 2018. The Inspector has referred his Report to the SofS and the Case Officer at PINS has indicated that a Decision will be issued on or before 16 June 2022. It s not
ST8	Land North of Monks Cross	970						30	70	100	100	100	100	100	100	100	100	70					clear how the appeal will be decided and whether the site will be found suitable for housing development. However, even if it is, and planning permission is granted in June, the trajectory still needs to be adjusted to reflect a more realistic lead-in time. With the need to secure RMs, discharge
																							conditions, secure technical approvals, deal with any residual land ownership issues, prep the site and delivery any infrastructure required, first homes unlikely to be completed before the end of 2024 and the state of the sta
																							probably later. If planning permission refused in June, trajectory for this site will need a fundamental review in the light of the reasons for refusal.
ST9	Land North of Haxby	735									45	90	90	90	90	90	90	90	60				Site has housebuilder involvement but there has been no application for planning permission and timescales for preparation of an application are unclear. Site is in Green Belt. If, say, hybrid application were to be submitted on adoption of the Plan, first homes could possibly be delivered in the 27/28
ST14	Land to West of Wigginton Road	1348									60	60	160	160	160	160	160	160	160	108			As per ST9
	Land to West of Elvington Lane	3339									35	70	105	105	105	140	210	210	280	280	280		Trajectory for this site left as is on basis that first homes forecast outside the first 5 years. However, if adoption of the Plan looks set to occur in the 2023/24 monitoring year, the Inspectors will need to
ST16	Terrys Extension Site - Terrys Clock Tower (Phase 1)	21				21																	satsify themselves that this site is deliverable and on the current evidence it is not.
	Terrys Extension Site - Terrys Car park (Phase 2) Terrys Extension Site - Land to rear of Terrys Factory (Phase 3)	0																					
	Nestle South (Phase 1) Nestle South (Phase 2)	279 302					279	35	35	35	35	35	35	35	35	22							
																							Site is being promoted for development by Gladman. Site is the subject of an outline planning applications that was submitted in 2018. There remain unresolved issues and it is not clear whether / when these will be resolved. However, even if planning permission is granted on adoption of the Plan,
ST31	Land to the South of Tadcaster Road, Copmanthorpe	158									35	35	35	35	18								when these will be resolved. However, even it planning permission is granted on adoption of the Plan, the first new homes are unlikely to be delivered on this site before the latter part of 2027. Trajectory adjusted to reflect this.
ST32	Hungate (Phases 5+) (Blocks D & H)	375							196				179										Site has housebuilder involvement. Application for full planning permission submitted in October 2021
ST33	Station Yard Wheldarke	150						7	35	35	35	38											but remains undertermined. Site is in the Green Belt. Assuming permission is granted on adoption of the Plan, first homes unlikely to be delivered before the 24/25 monitoring year. Trajectory adjusted to
ST36	Imphal Barracks, Fulford Road	769														100	100	100	100	100		169	reflect this:
	od Projected Completions for ST Sites od Housing Completions From Non Allocated Unimplemented Consents					21	332	230	585	457	642	880	1144	944	897	986	953	923	793	631	523	2524	I
Total	d Housing Completions From Communal Establishments/Student Accommodation	1909				483	333	363	250	105	143	232	0	0	0	0	0	0	0	0	0		
Total		539				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
	ijectory Completions (2017 to 2022)		1296 449	560 622	402																		
	Completions (all sites)					604	794	923	925 199	619 199	798 199	1780 199	1224 199	994 199	897 199	986 199	953 199		793 199	631 199	523 199		
Projected .	Annual Housing Completions (Inc Windfall Allowance) e Completions (Including Windfalls)		1296 1745	2305 2927	3329	604	794	923 5650	1124	818 7592	997 8589	1979 10568	1423 11991	1193 13184		1185 15465	1152		992 18731	830	722		
Over/Unde			474 101					-926		-628	-453	704	1305	1676	1950	2313				3121			

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