

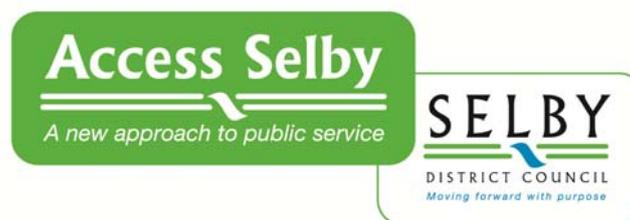
# **Selby District Council**

**5 Year Housing Land Supply April 2012 to March 2013.**

**Includes the Housing Trajectory**

**Final Methodology**

**December 2013**



## Contents

	<i>Page</i>
1. Introduction	1
2. Background	1
3. 5 Year Housing Land Supply Methodology	2
4. Housing Trajectory	9
5. 5 Year Housing Land Supply Results	10
<i>Appendix 1 –Agent/Developer Questionnaire</i>	<i>14</i>
<i>Appendix 2 –Completions on non-allocated sites (Windfalls)</i>	<i>15</i>
<i>Appendix 3 – 5 Year Housing Land Supply representations summary</i>	<i>16</i>
<i>Appendix 4 – Sites included within the 2012/13 5 Year Housing Land Supply</i>	<i>19</i>

## **1.0 Introduction**

1.1 The purpose of this paper is to:

- set out the methodology used in assessing the 5 year housing land supply;
- provide the basis for a 5 year housing land supply calculation; and
- provide the method for a housing trajectory including an affordable housing trajectory in line with NPPF.

1.2 Sections 2 and 3 of this paper deal with the 5 year housing land supply methodology. Section 4 deals with the housing trajectory.

## **2.0 Background**

2.1 Every year the Council is required to assess its 5 year supply of housing sites. The NPPF paragraph 47 requires Local Planning Authorities to:

*'identify and update annually of supply a specific deliverable<sup>1</sup> 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;*

Footnote: <sup>1</sup> *To be considered deliverable, site should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. 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.*

2.2 With this emphasis on viability, the assumptions used in calculating the 5 year supply have been re-considered or 'checked' through the involvement of the 5 year housing land supply Stakeholder Working Group (SWG). A summary of responses is provided within Appendix 3 and this final methodology has been agreed with the SWG.

### *Buffer*

2.3 As part of the NPPF there is also the requirement to provide a buffer of 5% (or 20% where there has been a record of persistent under delivery of housing) in land supply to offer greater choice and flexibility in the market.

- 2.4 Last year (2011/12) the Council assessed the local requirements for a buffer based on past completion rates. The 10 year average compared the annual housing requirement against housing completions and concluded that there was evidence of persistent undersupply; as such a 20% buffer is demonstrated in the calculations. See Table 3 (page 9) for further information.

*Definition of Previously Developed Land (PDL), Windfalls and Garden Land*

- 2.5 Paragraph 53 of the NPPF states '*Local Planning Authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area*'.
- 2.6 In addition, paragraph 48 of the NPPF states '*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*'
- 2.7 In the light of evidence from historic supply and the SHLAA methodology, coupled with expected future trends in line with the Core Strategy (SP4 – Management of Residential Development in Settlements) (*formerly draft Policy CP1A*), the Council is taking into account windfalls in the 5 year housing land supply in line with paragraph 48 of the NPPF. This approach is reasonable because the Core Strategy is now adopted and the 5 year housing land supply will be delivered during the new plan period (to 2027) covered by the Core Strategy.
- 2.8 In order to quantify the allowance, the Council has considered expected delivery through policy SP4, which allows for the development of greenfield land (which could include residential gardens) within Selby, Sherburn in Elmet, Tadcaster and Designated Service Villages. Policy SP4 does not allow the development of greenfield land including garden land in Secondary Villages.
- 2.9 As such, in addition to those sites which are PDL sites within Development Limits, those SHLAA 2011 sites which are greenfield and within the Development Limits of Designated Service Villages (DSVs) are considered within the 5 year supply for the 2012/13 5 year housing land supply<sup>1</sup>.

**3.0 Methodology for calculating the 5 year supply and Housing Trajectory.**

- 3.1 This methodology for the 5 year housing land supply sets out all the data sources and criteria which are applied in the calculations, consistent with NPPF paragraph 47 (and footnotes 11 and 12).

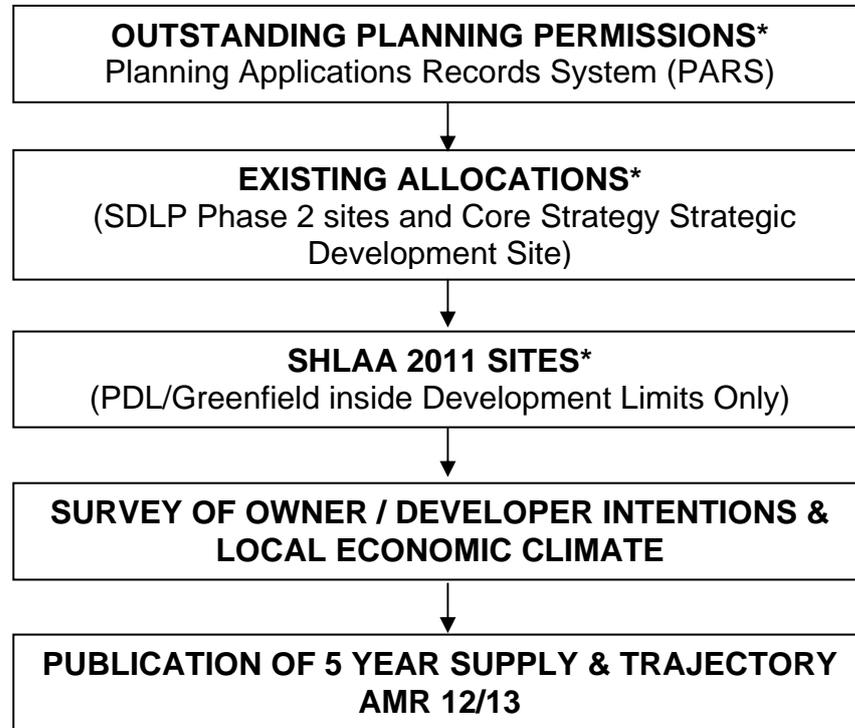
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<sup>1</sup> But excludes garden land in line with NPPF

*Data collection for 5 year housing land supply*

3.2 The flowchart below identifies the process involved in undertaking the annual update and the which data sources are used. Further explanation of each stage is outlined in detail later in this section.

**Figure 1. The 5 Year Housing Land Supply Process**



\* Only those sites which meet the criteria set out in this methodology

***Calculations***

3.3 Table 1 sets out the calculation method for how the data in Figure 1 is used. How sites are selected is explained further below.

**Table 1 The 5 Year Housing Land Supply Calculations**

<b>Stages</b>	<b>Data</b>
A =	Outstanding Planning Permissions (Full & Outline)*
B =	Existing Allocations (SDLP Phase 2 sites and Core Strategy Strategic Development Site)*
C =	SHLAA 2011 Sites*
<b>5 years housing land supply = A + B + C</b>	
D =	5% (or 20%) buffer of sites* pool in addition to the 5 years housing land supply calculations

\* only those sites which meet the criteria set out in this methodology

*How sites are selected*

- 3.4 The Council undertakes an annual survey of sites with planning permission within the District to ascertain the status of each site to determine what is built and what remains outstanding for future development.
  - 3.5 A list of planning permissions which are yet to be implemented (outstandings) is produced annually (Stage A) as at the 31 March to be included as part of the 5 year housing land supply calculations.
  - 3.6 This list of outstandings also includes outline planning permissions as the principle of development has been established, subject to reserved matters.
  - 3.7 To avoid double counting, SHLAA sites (stage C) are assessed against the list of planning permissions so site yields are not included twice in the calculations.
  - 3.8 The footnote to paragraph 47 of the NPPF states that 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. In undertaking the site assessments, small sites and large sites are treated differently for practical reasons.
- A1 Smaller sites (less than 15 dwellings)**
- 3.9 Small sites are not individually assessed. However, in order to take a cautious approach, a non-implementation discount is applied to the total number of outstanding dwellings on sites of less than 15 dwellings. In previous monitoring reports a discount rate of 10% has been applied in line with Policy SP5 of the Core Strategy (The Scale and Distribution of

Housing) (*formerly draft Policy CP2*) and it is proposed that this approach is retained this year following debate with the Stakeholder Working Group.

***A2 Larger sites (15 dwellings or more)***

- 3.10 As part of the 5 year housing land supply, even prior to the NPPF, commitments have been examined critically in accordance with the methodology below, in order to ascertain the likely rate of deliverability on large sites. This is considered prudent in light of market conditions which influence the delivery of housing on the larger sites.
- 3.11 All landowners or developers of larger sites (15 dwellings or more) are contacted directly to obtain a record of their expected delivery on sites over the next 5 years for inclusion in the 5 year housing land supply calculations to support the delivery rate used. A copy of the developer questionnaire is attached at Appendix 1 for information.
- 3.12 As long as there is clear evidence provided by the landowner/developer of the expected delivery, this 'actual' figure is used and it is assumed that these sites with permission can realistically be delivered within the 5 year period.
- 3.13 Added to this, on very large sites which have the potential to supply housing throughout and beyond the 0-5 year time period, an assumption has been made (in accordance with that made in the SHLAA 2011 methodology and in the light of recent evidence of delivery on large sites) that a maximum of 50 dwellings will be built per year. This reduces the potential delivery for any site over the five-year period to 250 dwellings even if their potential yield is higher than this. Large sites which will still be delivering housing beyond the five year period will be used to inform the buffer (see paragraph 3.46).

***B = Existing Allocations***

- 3.14 Phase 2 allocations from the 2005 Local Plan have also been analysed in order to include those sites and/or plots within the 5 year housing land supply calculations where realistic/reasonable to do so.
- 3.15 The land owners of Allocated sites are also contacted directly to ascertain when the site will be coming forward as a planning application, how viable a site is, and when they expect to be on site. This information is then used to determine which sites to be included within the 5 year housing land supply calculations, the anticipated lead times and expected delivery.
- 3.16 Only sites which are 'oven ready' (i.e. have already had a planning application submitted or there is clear intention that the landowner/developer will submit within the next 18 months), and only those considered deliverable, would be included within the 5 year housing land supply calculations.
- 3.17 Once sites have been selected for inclusion and an expected start date

has been received from the developer, the delivery rate of up to 50 dwellings (maximum) per annum is used to calculate the number of plots to be included within the calculations.

- 3.18 Each site is assessed to consider all available evidence which may affect the deliverability of the site.
- 3.19 Where no information has been provided by the landowners it is assumed that the site is not available for development and it is therefore not included within the 5 year housing land supply calculations.
- 3.20 The Core Strategy Strategic Development Site at Olympia Park is included in this year's 5 year housing land supply. The Core Strategy has been adopted and the Council is in the process of determining a planning application on the site. Information regarding the future delivery of the site has also been received from the agent. It is therefore considered prudent to include the site in this year's assessment.

**C = SHLAA sites**

- 3.21 Further contributions to the 5 year housing land supply are identified from the SHLAA and included in the 5 year housing land supply calculation where they meet specific criteria.
- 3.22 The SHLAA was last updated in 2011/12 and a call for sites exercise was undertaken. Through this process the number of sites within the SHLAA database has doubled as more landowners seek to promote their site for development.
- 3.23 It should be noted that not all SHLAA sites are included in the 5 year housing land supply calculation – only those which meet certain criteria.
- 3.24 All sites within the SHLAA database accord with the following assumptions:

*Site Criteria*

- 3.25 A minimum size of 0.4 hectares (or 10 dwellings).  
The planning status of each site was recorded. If a site has permission for housing, it will be known to be suitable at this time, and if development has commenced, it will be apparent if a site has 10 or more plots to build remaining. Sites with planning permission have also been assessed as part of the SHLAA.

*Yield*

- 3.26 The potential yield for each site is calculated using a density of 45dph for sites within the Selby Urban Area and 35dph in the rest of the District. These figures were agreed as part of the SHLAA Working Group.

*Landowner intentions*

- 3.27 Information is gathered on the details of site ownership and the landowners' intentions of when they may seek development of the site. Sites have only been included in the plan period if there are clear intentions provided by the landowner.

*Site assessment*

- 3.28 Based on planning guidance, each site is assessed in terms of its suitability, availability and achievability, using a traffic light system (green, amber, red), to assess when the site is likely to come forward, within which time period (0-5 years, 6-10 years, 11-15 years).

*SHLAA sites selection to be included within the 5 year housing land supply*

- 3.29 5 year housing land supply calculations in previous years have used SHLAA sites on PDL within Development Limits as those sites which are likely to make a contribution in line with the current policy at that time.

- 3.30 For the 2012/13 calculation the following criteria are used for site selection:

*Windfall Sites and Potential Garden Land*

- 3.31 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.

- 3.32 Appendix 2 provides the historic data for completions on non-allocated sites (windfalls) in the District since 2005 as submitted to the recent Core Strategy Examination In Public. This shows that there has been a high level of completions on non-allocated sites. However, for the 5 year housing land supply calculation it is proposed to only include the potential for new development in line with Core Strategy Policy SP4 which is expected to be much lower<sup>2</sup>.

- 3.33 Therefore, only those SHLAA sites which are within Selby, Sherburn in Elmet, Tadcaster and the Designated Service Villages which are on previously developed land (PDL) or on greenfield land (in line with Policy SP4 of the Core Strategy), which are considered available within the 0-5 year period are selected from the database to be included in the 5 year housing land supply.

- 3.34 To avoid double counting, sites are not included in the calculations where they already have planning permission or are on allocated (Phase 2) sites. Sites which contain garden land are also excluded in accordance with NPPF (paragraph 53).

- 3.35 In Secondary Villages, Policy SP4 supports development on previously development land and the infilling of small linear gaps in otherwise built up residential frontages which are considered available within the 0-5 year period. However, because this source of supply is expected to be minimal and only comprises very small sites within the restrictions of the policy, they are not included as part of the 5 year housing land supply

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<sup>2</sup> The Council's evidence to the Core Strategy EIP, September 2011: See SDC Written Statement No. 6 at <http://www.selby.gov.uk/upload/Matter-2-SDC-WS6.pdf>

calculations. Such sites cannot be identified and so would not comply with NPPF.

***D = Buffer***

- 3.36 The NPPF (paragraph 47) requires that Local Planning Authorities should have a 5 year housing land supply *“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”*
- 3.37 A 5 % buffer means an extra 5% on top of the 5 year housing land supply. For Selby District this would be 5% of (450 x 5) = 5% of 2250 = 112.5 dwellings extra required. A 20% buffer is an extra 20% on top of 2250, which would be 450 extra dwellings.
- 3.38 Advice from the Planning Inspectorate and Planning Advisory Service suggest that in order to assume a 5% or 20% buffer, it would be appropriate to consider the long-term average delivery, and suggests the past ten years, to inform the Council’s decision.
- Previous completions and the ‘buffer’ for the 5 year supply*
- 3.39 Table 2 illustrates the completions for the past ten years within the District.

**Table 2. Annual Housing Requirement and Annual Completions**

Year	03-04	04-05	05-06	06-07	07-08	08-09	09-10	10-11	11-12	12-13
Total Completions	297	469	638	874	583	226	270	366	338	248
Target	620	620	620	575*	440	440	440	440	440	440**

\* Total annual dwelling requirement up to 31 December 2006 is 620 and 440 from 1 January 2007, providing a requirement of 575 dwellings between 1 April 2006 and 31 March 2007.

\*\* Requirement changed to 450 dwellings per year following revocation of Regional Strategy on 22 February 2013. Total annual dwelling requirement up to March 2013 is 440, and from March 2013 onwards the requirement is 450, providing a pro-rata requirement of 440.5 dwellings up to 31 March 2013. This figure is rounded to 440 dpa.

- 3.40 The average annual completion is 431 dwellings over this period. Looking at the past 10 years it can be seen that there has been over-delivery and under-delivery year by year (Table 2).
- 3.41 Over the years there have been different annual targets due to different policy regimes. With the years 2003/04 to 2005/06 the annual housing target was 620, and then this was reduced to 450. The revocation of the

Regional Strategy in 2013 means that the target then rose to 450 in March 2013. This means that over the past 10 years, the average annual requirement was 507.5 dwellings, compared to the actual average delivery of 431 dwellings.

3.42 Table 2 shows there was under-delivery in 7 out of the previous 10 years, demonstrating a record of *persistent under delivery*, meaning that a 20% buffer should be applied.

3.43 The Council therefore considers that it is appropriate to demonstrate an additional buffer of 20% in this year's 5 year housing land supply.

*Sites to provide the 20% 'buffer'*

3.44 The NPPF suggests that the additional buffer is '*moved forward from later in the plan period*'. In previous years the Council included SHLAA sites which had been assessed as "not available in the next 0-5 years", in line with the SHLAA 2011 methodology.

3.45 The following criteria was previously used to consider SHLAA sites for the buffer pool:

- have been assessed overall as 6-10 years, but are being promoted by the landowner as being available in the 0-5 year period, and
- are within the parishes of Selby, Sherburn in Elmet, Tadcaster or the Designated Service Villages; and
- are within or adjacent to Development Limits; and
- where the only reason they have been classed as available in the 6-10 years bracket is due to them not meeting current planning policy tests.

3.46 In assessing the approach to the buffer, the Council and the Stakeholder Working Group considered using existing planning permissions on large strategic/major sites where there is an expectation that delivery of that site will still be coming forward beyond the 5 year period due to the number of plots. However, due to the low number of responses received, the Council has decided to revert to the method used in previous years, which brings SHLAA 6-10 sites forward as set out in paragraph 3.45.

#### **4. Housing trajectory**

4.1 Paragraph 47 of the NPPF sets out the requirements for producing a housing trajectory; '*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*'.

4.2 The NPPF requires the inclusion of affordable housing in the trajectory. The Council will therefore include expected affordable housing delivery throughout the plan period.

- 4.3 Overall the trajectory comprises an initial, relatively firm, prediction of housing delivery for the first five years (based on the 5 year housing land supply), together with a longer term illustration of expected delivery which will arise through the implementation of the Local Plan (Core Strategy and emerging Sites and Policies Plan).
- 4.4 The trajectory is set against future housing requirements. As at the 31<sup>st</sup> March 2013 the housing target for the District is set by the Core Strategy which is 450 dwellings per annum until 2027.
- 4.5 As with previous years, market housing will be presented in the housing trajectory based on the 5 year supply figures for the first 5 years, and the housing target of 450 per annum for the remainder of the plan period (years 6 to 15).
- 4.6 As part of the survey of current sites being developed within the District, landowners and developers are asked for an indication of their expected delivery of market and affordable housing over the next 5 years (see Appendix 1).
- 4.7 In addition, local Registered Providers (RPs) have been contacted to ascertain their delivery programme to inform what units they are expecting to manage over the next 5 years.
- 4.8 The information received from developers and RPs is considered alongside policy expectations which together inform the 5 year supply element of the trajectory.
- 4.9 On SHLAA sites and Local Plan allocations that have not yet been granted planning permission, a target of 40% affordable housing units of the expected site yield will be used in ascertaining the amount of affordable housing expected to be delivered within the first 5 years of the plan period. This reflects the Core Strategy policy SP9 (*formerly draft Policy CP5*) position.
- 4.10 For the remainder of the plan period (years 6 to 15) of the trajectory a 40% delivery rate of affordable housing will be used in the housing trajectory.

## 5. 5 Year Housing Land Supply Results 12/13

Summary of sites contributing to 5 year supply		Potential Yield (Dwellings)
A	Outstanding Planning Applications (NETT) (2012-13)	1389*
B	Existing Allocations (SDLP Phase 2 sites and Core Strategy Strategic Development Site)**	942
C	SHLAA 2011 Sites**	114
Total plots considered to contribute to 2011/12 5 Year Supply		2385

<b>5 YEAR HOUSING LAND REQUIREMENT (450 x 5)</b>	<b>2250</b>
<b>5 year land supply position (supply/annual requirement)</b>	<b>2385/450 (dpa)</b>
	<b>5.3 Years Supply</b>

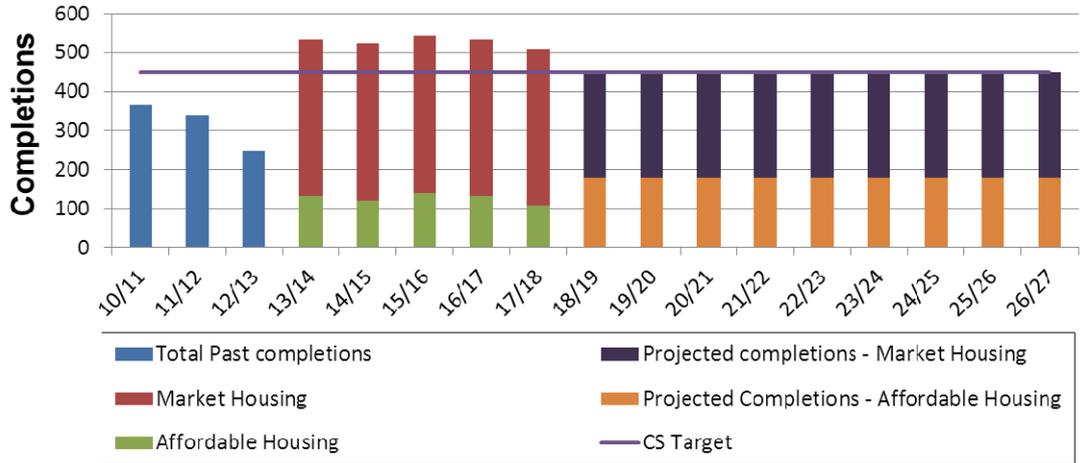
\*Due to the large number of applications included within this figure, the raw data is not included in this publication.

\*\*Sites included are provided in Appendix 4.

### Buffer

NPPF Buffer sites		Potential Yield (Dwellings)
D	SHLAA 6-10 Year sites	500
5 year land supply position (supply/annual requirement)		500/450 (dpa)
<b>5 YEAR HOUSING LAND REQUIREMENT BUFFER (500/2250) x 100</b>		<b>22.2%</b>

### Housing Trajectory Target Annual Completions 2011 - 2027



## **5 Year Housing Land Supply Methodology 2012/13**

### **Appendices**

## Appendix 1 – Developer Questionnaire

Dear developer/agent,

The Council is currently assessing its 5 year housing land supply for the April 2012/ March 2013 monitoring year. In order to realistically project the expected housing numbers to be included in the assessment we are contacting developers and agents to provide information on expected site delivery.

This time last year you kindly supplied us with information regarding the anticipated housing completions for this year, and the next 4 years. I would be very grateful if you could refresh this data up to 2018 by **XXX**

Please can you provide the following;

Site Name: \_\_\_\_\_

Location: \_\_\_\_\_

Planning Perm No: \_\_\_\_\_

Site Developer / Owner \_\_\_\_\_

Total site capacity: \_\_\_\_\_

Outstanding Plots as at (date) \_\_\_\_\_

### Current delivery programme

Please can you provide expected market dwellings per annum in the table below. The NPPF also requires Local Planning Authorities to include expected affordable housing delivery within their 5 year supply.

Year	13/14	14/15	15/16	16/17	17/18
Market Housing					
Affordable Units					
First time buyer offer*					

*\*Expected units First time buyer offer provided directly by housebuilder (e.g. Home Buy, First Buy etc).*

As part of the 5 year supply assessment we would also be interested to know the current market interest in your site, if market conditions are improving and if houses are selling in the area? Please provide any comments you may have on this matter as part of your response.

## Appendix 2 – Completions on Non-allocated Sites (Windfalls)

				Figures for non-allocated sites (SDC definition)				Figures for only those non-allocated sites which are also PDL	
Period	Completions total	Completions on allocated sites	% of completions On allocated sites	Completions on all other sites (windfall)	% of Completions on all other sites (windfall)	All completions on PDL	% of all completions on PDL	Of windfalls, how many on PDL*	% of windfall completions on PDL
2010-11	366	155	42.3	211	57.7	181	49.5	174	82.5
2009-10	270	107	39.6	163	60.4	125	46.3	117	71.8
2008-09	222	59	26.6	163	73.1	154	69.4	146	89.6
2007-08	583	240	41.2	343	58.8	299	51.3	271	79.0
2006-07	874	187	21.4	687	78.6	585	66.9	585	85.2
2005-06	633	53	8.4	580	91.6	473	74.7	473	81.6
2004-05	469	167	35.6	302	64.4	242	51.6	242	80.1
<b>TOTAL 2004-2011</b>	<b>3417</b>	968	-	2449	-	2059	-	2008	-
<b>Average 2004-2011</b>	<b>488</b>	138	30.7%	350	<b>69.2%</b>	294	58.5	287	<b>81.4%</b>

\*All allocated sites with the exception of HAM/2 are Greenfield. HAM/2 has 51 of its 89 dwellings on PDL, delivered as follows:

- 2007/08 = 33 completions of which 28 on PDL
- 2008/09 = 16 completions of which 8 on PDL
- 2009/10 = 13 completions of which 8 on PDL
- 2010/11 = 28 completions of which 7 on PDL

All other PDL was from windfalls.

### Appendix 3 – 5 Year Housing Land Supply representations summary following comments from Stakeholder Working Group

The comments made through the Stakeholder Working Group are summarised below and have been incorporated into the 5 year housing land supply methodology and amendments made where appropriate, to ensure the methodology remains robust.

Comment	Council Response
Agree with 20% buffer	Noted.
Note of caution on use of windfall and double counting with planning approvals in yrs 1 and 2. Harrogate took a sensible approach on this by not including windfall in those early years to avoid double counting.	Policy SP4 (formally CP1A) of the CS sets the criteria for 'windfall' development. Double counting of development on 'allocated' and 'non-allocated (windfall)' sites is dealt with in the 5 YHLS methodology. The methodology sets out how double counting is avoided.
Suggest 20% discount on smaller planning approvals	10% discount for non-delivery is established under Policy SP5 of the adopted CS and continues the approach used in previous years for non-delivery.
Cast doubt and require further explanation of why Olympia Park is automatically included (para 3.21).	Following the adoption of the Core Strategy in 2013 and submission of an application, further information is now available on the Olympia Park Strategic Development Site. Further explanation to be provided in 5 YHLS methodology.
Concerned that the methodology places an over-reliance on emerging sites from the SHLAA (pages 6, 7 and Green Belt sites para 3.48).	SHLAA sites included which accord with the criteria in line with policy SP4 of the Core Strategy and para 48 of the NPPF. With regards to Green Belt, the Council is proposing a different approach to the 'buffer', details to be provided in methodology.
Agree with the 20% buffer to ensure 5yhls is robust.	Noted.
Agree with 50 dpa on sites, however, where a site only has outline then it is not 'oven ready' and therefore it may not be appropriate to assume 50 dw in first year to allow lead-in time to secure reserved matters. Potentially open to criticism if outlines given 50 dpa across whole 5 yr period.	Landowners/developers on sites with planning permission of 15 or above are contacted directly to ascertain when development is likely to start on site and delivery over the next 5 years. Further explanation is set out in paragraphs 3.11 – 3.14.
Sites should only be screened out on deliverability grounds, typically flood zone 3b (functional floodplain). Where areas are defended these shouldn't be considered as functional floodplain as they don't act as water storage during a flood. Suggest updating SFRA to resolve issues with functional floodplain	Noted.

classification.	
Query how we intend to make up any housing shortfall against annual 450 requirement. Will this be spread across the plan period or front loaded into the first 5 years.	Core Strategy Policy SP6 (formally CP3) sets out the mechanism for dealing with under-delivery which falls short of the annual requirement over a continuous 3 year period. Paragraphs 72-74 of the Inspectors Report into the Core Strategy Local Plan deal with housing shortfall. Housing delivery will be monitored through the AMR.
20% buffer – do you intend to add the 20% buffer to the 450 requirement then add on any housing shortfall, or, add the housing shortfall to the 450 requirement and then add a 20% buffer?	As above.

Following the above consultation the Council also consulted again on an alternative option on the ‘buffer’ methodology. This option considered using sites with existing planning permission that are planned to be onsite beyond the 5 year period as providing an extra supply of housing as the buffer. The table below summarises the comments received.

<b>Comment</b>	<b>Council Response</b>
Welcome the decision to lift the buffer from 5% to 20%. A quick look at the annual completions shown both at tables 2 and 3 makes pretty sobering reading when set against the annual targets for that period. We would agree therefore that an under achievement in 7 of those 10 years certainly looks like a “call for action”.	Noted
Might I suggest that the windfall contribution, so long a reliable source of supply within Selby District, has taken a hit because of the extent of flood risk issues especially in Selby town and to a lesser degree the DSV's. Whilst the Council applies a district wide search criteria to site sequential testing (under the NPPF) it must follow that a very large percentage of brownfield windfalls in Selby town will now be refused consent.	Windfall still provides a contribution to housing completions within the District.  The Council is currently investigating the approach to the Sequential Test for sites in flood risk areas in line with the adopted Core Strategy policy SP4 and the distribution of housing within the settlement hierarchy.
Expanding the buffer to 20% coupled with the application of the selection criteria shown on paragraph 3.45 will, we believe, help boost the number of completions. As we also have some	Noted. Following the adoption of the Core Strategy in 2013 and submission of an application, further information is now available on the Olympia Park Strategic Development Site. Further explanation to

doubts as to the deliverability of the Olympia Park strategic designation (especially in the first 5 years), bearing in mind the Inspector's cautionary remarks at his paragraph 96, it seems sensible to put in place a methodology which should "deliver a wide choice of quality houses" ( NPPF paragraph 50). In the absence of such an alteration to the 5 year supply methodology there is a real danger that deliverability will be too dependent on a small number of major allocations.

be provided in 5 YHLS methodology.

In addition to the Core Strategy Strategic Development Site, further land allocations to identify where new housing, employment and other significant development will be placed, will be sought to deliver the requirements set out in the Core Strategy, through a Sites and Policies Local Plan (SAPP).

## **Appendix 4 – Sites included within the 2012/13 5 Year Housing Land Supply**

**B = Existing Allocations (SDLP Phase 2 sites and Core Strategy Development Site)**

Phase 2 Site	Site Area (ha)	SDLP Site Capacity	5 Year supply figures based on information provided					Total
			13/14	14/15	15/16	16/17	17/18	
BYR/1	0.7	21			23			23
CAM/1	2.12	55		-	-			
CAR/1	2.4	79				35	3	38
CAR/2	2.6	12						-
EGG/2	1.5	23			23	-	-	23
EGG/3	6.76	210		50	50	50	60	210
HAM/1*	0.53	0 – Cherwell Croft						0
OSG/1	1.47	45						
SEL/1	21.9	450+				50	50	100
SEL/2*	56	0 – Staynor Hall development						
SEL/2A*	1.04	0 – Part of Holmes Lane/Coupland Road development						
SHB/1B	39.3	900+		50	50	50	50	200
STM/1B*	4.23	0 – Southlands Close						
TAD/2	3.48	105						
THW/2	4.96	148			50	50	48	148
Olympia Park					50	50	50	150
Expected delivery by year			0	150	196	233	163	<b>942</b>

\*Site included within outstanding planning permissions

**C = SHLAA 2011 sites included within the 2012/13 5 year supply**

Site Reference	FINAL TIME PERIOD	Site Size (ha)	Potential yield for 0-5yrs	Yield estimate	Land Type	Development Limits	Main Issues TIMESCALE	Garden Land?	Phase 2 site?	Extant PP for resi?	Sites Yield
PHS/16/010	Yes 0-5 years	0.74	33	33	Mixed	Within	SDC Declared surplus; closed depot. Industrial site with associated clearance costs and potential for contamination.	No	No	No	No double counting - yield <b>33</b>
PHS/19/020	Yes 0-5 years	0.55	25	25	PDL	Within	No major physical constraints. Industrial site with associated clearance costs and potential for contamination.	No	No	No	No double counting - yield <b>25</b>
PHS/58/014	Yes 0-5 years	0.49	17	17	Greenfield	Within	N/A	No	No	No	No double counting - yield <b>17</b>
PHS/64/002	Yes 0-5 years	1.12	39	39	PDL	Within	Improvements required to Tadcaster WWTW.	No	No	No	No double counting - yield <b>39</b>
PHS/64/010	Yes 0-5 years	0.97	0	0	PDL	Within	Within development limits of DSV.	No	No	No	Double counted with PHS/64/002 - yield to remain <b>0</b>
						FINAL FIGURE	Green Sites with double counting removed				114

**D = SHLAA 2011 'buffer' sites included within the 2012/13 5 year supply**

Site ref	Total potential yield	Available yield for 6-10 years
PHS/19/025	1467	250
PHS/53/003	477	250
TOTAL (available yield for 6-10 years)		500