

YORK LOCAL PLAN

EXAMINATION IN PUBLIC

Response to Inspector’s Matters, Issues and Questions

Made on Behalf of Barratt and David Wilson Homes

Matter 2 – Housing Need and Requirement

Introduction

These responses are made on behalf of Barratt and David Wilson Homes (Yorkshire East), hereafter referred to as our Client. Our Client is the country’s largest housebuilder and has an excellent delivery record nationally and locally in the region.

Our Client has a significant number of land holdings within and around York and has made representations throughout the CYCLP consultation process at all stages. In summary and for clarity the following is a list of our Client’s interests.

| Site Address | Site Reference | CYCLP Area | CYCLP 2013 Capacity (BDWH control) | CYCLP 2016 Capacity (BDWH control) |
|------------------------------|----------------|------------|------------------------------------|------------------------------------|
| Manor Heath, Copmanthorpe | ST12 | 1 | 250 | 0 |
| Moor Lane, Copmanthorpe | H29 | 1 | 65 | 88 |
| Riverside Gardens, Elvington | SF10 | 2 | 0 | 0 |
| Eastfield Lane, Dunnington | H31 | 3 | 75 | 84 |
| Metcalfe Lane, Osbaldwick | ST7 | 4 | 750 | 35 |
| New Lane, Huntington | ST11 | 4 | 360 | 0 |
| North of Monks Cross | ST8 | 6 | 35 | 35 |
| North of Haxby | ST9 | 6 | 375 | 375 |
| North of Clifton Moor | ST14 | 6 | 750 | 500 |

At the previous examination hearings, the Council’s position was that, taking account of the 2016 based projections published by the Office for National Statistics (ONS), the need for housing in York over the Plan period was 790 dwellings per annum (dpa) and that, to meet this need and to address a shortfall in delivery of 32 dpa between 2012 and 2016, the housing requirement should be 822 dpa. Since then, the ONS has published its 2018 based projections. In response, the Council has considered whether or not those projections lead to

a meaningful change in these figures. The 'Housing Need Update' (2020) concludes that economic-led housing need is in the range of 777 to 778 dpa. The Council considers that this does not amount to a meaningful change in the housing situation, such that the need for housing should be regarded as 790 dpa and the Plan's housing requirement should remain set at 822 dpa (i.e. 13,152 dwellings overall).

2.1 The introduction above sets out our understanding of the Council's position. Is it correct?

2.1 This is our understanding of the Council's position.

2.2 In the Housing Need Update (2020) what methodological approach has been used to establish the OAHN and does it follow the advice set out in the Planning Policy Guidance (under the heading 'Methodology: assessing housing need')? In particular:

- a) **Have market signals been taken into account and, if so, what effect have they had on calculating the OAHN?**
- b) **How have employment trends been taken into account in determining the OAHN? How robust are the assumptions that have been made regarding those trends and what impact have they had on the final OAHN?**
- c) **Does the economic-led OAHN assessment now still reflect an appropriate OAHN to be addressed and delivered through the Plan during the Plan period?**
- d) **Overall, has the OAHN figure been arrived at on the basis of a robust methodology and is it justified?**

2.2 We reserve the right to comment further at the examination once we have understood the Council's position in relation to these matters. From a review of the update it appears that the Council have used the previous methodology with the most up-to-date housing figure, rather than update all inputs into the assessment. On this basis, the overall figure has not necessarily been based on a robust methodology.

2.3 Has there been a meaningful change in the housing situation in York since the Plan was submitted and, if so, how should this be addressed in the Plan?

2.3 Since the plan was submitted the Council have continued to significantly fail to meet their housing requirement, they have seen a reduction in both their five year land supply and their affordable housing provision.

2.4 The Council's five year land supply position in April 2017 was agreed at appeal between 1.9 – 3.8 years, increasing to 3.28 – 3.82 (2019), reducing again to 2.19 – 2.77 (2020) and more recently in 2021 agreed at appeal as between 2.79 – 3.45 years supply.

2.5 The position with affordable housing shows an even worsening delivery, with significant impact on affordability, the provision of affordable homes and the complete inability of the Council to meet both its market and affordable housing requirement. The position with relation to affordable homes has become even worse since the plan was submitted.

- 2.6 The 2016 SHMA concludes a need for 573 affordable homes between 2012 – 2032. From 2012 to 2019 only 693 affordable homes were delivered, only 17% of the affordable need. Further to this the Councils updated paper on affordable housing shows a sharp decline since the plan was submitted. Only 69 affordable homes were provided in 2017/18 and only 56 affordable homes in 2018/19.
- 2.7 The Councils evidence does not detail the net completions, however it does show that in the same period 408 homes were sold under the right to buy, therefore resulting in a net delivery of 295 homes, 7% of the requirement. In simple terms this means over a seven year period nine out of every ten people in need of an affordable homes did not have one provided.
- 2.8 Looking at these figures in more detail, the updated affordable background paper shows that in two years recently there was a net reduction in affordable housing provision with three less homes in 2017/18 and four less homes in 2018/19. For an authority to have a reduction in affordable provision over two years is unique and shows a total failure of their approach.
- 2.9 The plan has been significantly delayed, no affordable homes have been delivered, market homes have stalled and the Council have no alternative. The Council refer to exception sites being able to provide new homes, however a large exception site for 60 homes submitted to the Council was refused, with insufficient weight given to the affordable need.
- 2.10 Despite this woeful delivery, increased backlog, increased shortfall, increased need and cumulative under delivery, the Councils position appears to be to deliver the same annual requirement without adjustment over a shorter plan period.
- 2.11 This new information shows a meaningful change in the housing situation, a need for this to be resolved and the need for an increase in the amount of homes required.

The housing requirement

2.4 Is the shortfall figure (for 2012-2017) of 32 dpa which is incorporated into the 822 dpa housing requirement still a robust and justified figure?

- 2.12 Given the delays to the plan, the reduced plan period and the further undersupply from 2017 - 2022, this figure should be updated and the overall backlog added to an increased housing requirement.

2.5 Does the 822 dpa housing requirement take into account any backlog or under delivery of housing in previous years? If so, how?

- 2.13 As per our answer above the 822 homes figure only applies the backlog from 2012-2017, with a requirement of 822 homes over the plan period.

- 2.14 In the five years since the Councils identified backlog (2017), the Councils updated trajectory shows a cumulative under delivery of 417 homes, which will need to be made up over the remaining plan period. The trajectory shows an uplift between 2022/23, with delivery on a number of the allocated sites in the plan.
- 2.15 Given the delays to the plan, the further hearing sessions, modifications, time to receive the Inspectors report and adoption, the plan is unlikely to be adopted in that period. On this basis, the following years figures are also likely to be under delivered and as such, the backlog increasing with the number of years left in the plan reducing.
- 2.16 The impact of under delivery and backlog needs significant consideration in understanding the delivery of homes in the plan period. The Councils past delivery is clear to see and the failures in plan making a key consideration in this. As a consequence the ability to rely on plan reviews is significantly reduced and this plan, needs to ensure sufficient homes are allocated to meet the needs.
- 2.17 On this basis, the backlog needs to be updated, the level of homes deliverable in the plan period accurately represented in the trajectory and more homes allocated to meet the shortfall.