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Dated: March 2022



**Examination of the City of York Local Plan  
2017-2033**

**Phase 2 Hearings**

**Matter 5  
Housing Land Supply**

Prepared by

I D Planning

On behalf of

Green Developments

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## 1. Response to Matter 5 – Housing Land Supply

### The Housing Strategy: The Objectively Assessed Housing Need

#### **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 The Plan does not provide an appropriate policy framework for the delivery of housing to meet the needs of older people.
- 1.2 The submitted plan clearly identifies that York has a population that is older than the national average, with the SHMA identifying a need for 84 specialist units per annum (sheltered or extra-care) and a potential need for 37 bedspaces per annum for people aged 75 and over.
- 1.3 The Planning Practice Guidance relating to housing for older and disabled people stresses the importance of establishing the need for older persons housing and the need to provide clear policies to address the housing needs of this group. Whilst it is acknowledged the Council has included a policy relating to older persons housing, the onus is on the market to bring such developments forward and for developers to be able to acquire an allocated housing site.
- 1.4 Paragraph 012 Ref ID: 63-012-20190626 (planning practice guidance) clearly states that plans need to provide for specialist housing for older people where a need exists. The plan clearly identifies a need for 84 specialist units per annum yet does not specifically provide for this need to be met.
- 1.5 Throughout the preparation of the Local Plan and associated consultations we have raised concerns regarding the soundness of the Plan in respect of its ability to deliver the aims set out in Policy H9 (Older Persons Specialist Housing). Whilst this policy supports the delivery of housing for older people in principle, it relies on sites being brought forward speculatively by developers or delivery through appropriate accommodation types on strategic sites over 5ha. The plan only has one allocation for specialist housing (H6).
- 1.6 Despite the need for 84 specialist units per annum being identified, the table of housing completions in the SHLAA Update Report shows that the needs of older people are not being met and we would expect that trend to continue given the Council has not identified specific sites in its plan to deliver the 84 specialist units per annum, with the onus being on the market to bring such developments forward and for developers to be able to acquire an allocated housing site.
- 1.7 We have been liaising with the Council's Health, Housing and Social Care Team who are responsible for supporting the Older Persons Accommodation Programme. Attached to this statement is a report which was presented to the Council's Health and Adult Social Care Policy and Scrutiny Committee (December 2019) which provides further clear evidence of the need for older persons accommodation and supports the need for the Plan to identify a policy that will deliver the required dwellings.

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### **Soundness Issue Identified**

- 1.8 The SHLAA Update provides clear evidence that the needs of older people are not being met and with only one site identified in the plan for this purpose, the Plan will not be effective in meeting the identified needs of older people and results in plan that is not positively prepared. On this basis, the Plan is unsound.

### **Proposed Change to Address Soundness Issue Identified**

- 1.9 To address this issue, the Plan should identify sufficient sites specifically to meet the need for 84 specialist units per annum over the Plan Period and should be clearly set out in the housing trajectory.
- 1.10 If no additional sites are allocated to meet the identified need, and in the context of the new evidence in the SHLAA update which shows that there has been an undersupply of dwellings for older people in the 2 years that have been monitored, a policy is required that would support sites adjacent to settlement limits and in sustainable locations to meet the deficit.
- 1.11 This modification would ensure the plan is positively prepared and effective in meeting the identified needs of older people, given the new evidence highlights their needs are not currently being met and the plan does not identify sufficient sites to meet this specific identified need.
- 1.12 Without sufficient allocated sites to specifically meet this need or a policy to ensure the identified deficiency can be addressed, the plan will not be effective in meeting the identified needs of older people in York.