

PHASE 3
MATTER 1



JohnsonMowat
Planning & Development Consultants

Examination of the City of York Local Plan
Matters, Issues and Questions for the Examination

Phase 3 Hearings

Matter 1 – Affordable Housing

July 2022

CLIENT: Redrow Homes



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1.0 INTRODUCTION

- 1.1 This response has been prepared on behalf of Redrow Homes in relation to their land interests at Monks Cross, York which is proposed allocation ST8 and land immediately west of, in the Publication Draft Local Plan.
- 1.1 An Outline Planning Application for the development of circa 970 dwellings including infrastructure, open space, primary school, associated community facilities, convenience store and Country Park was submitted on behalf of Redrow Homes (Yorkshire) Limited in January 2018 on the emerging Local Plan ST8 site (18/00017/OUTM). The application was appealed for non-determination Appeal Ref: APP/C2741/W/21/3282969. A public inquiry was held over 4 days 25 – 28 January 2022. At the stage of closing statements, both appellant and LPA were supportive of an approval subject to S106. The decision now stands with the Secretary of State.
- 1.2 Previous submissions have been made to the Local Plan Examination, including attendance at the Phase 1 and Phase 2 Hearings. The content of previous submissions remains relevant, including the Publication Draft submissions in February 2018, July 2019 Proposed Modifications, the Phase 1 and Phase 2 Hearing Statements, and the June 2021 Modifications and Evidence Base Consultation. In addition to this statement relating to Examination Phase 3 Matter 1, it should be noted that statements have been prepared for Matter 4, Matter 9 and Matter 10 on behalf of Redrow Homes, and Johnson Mowat will be representing Redrow Homes at the Phase 3 Examination Hearing sessions relating to Matters 1, 4 and 10.
- 1.3 A Statement of Common Ground specific to Policy SS10 (Site ST8) has been drafted and it is anticipated that by the time the Phase 3 Hearings commence the Statement of Common Ground will be signed by all parties.



2.0 RESPONSE TO INSPECTOR'S QUESTIONS

Matter 1 Affordable Housing

Q.1.1 What is the need for affordable housing?

2.1 Johnson Mowat consider the need for affordable housing in York continues to grow following recent prices rises in both property and inflation. As wages fail to match these increases, it is only logical to assume the need for affordable housing is greater now in 2022 than was the case in the Council's 2016 SHMA and 2020 updates.

2.2 The 2020 Housing Need Update and the Affordable Housing Note (February 2020) do not review affordable housing need, but the Affordable Housing Note continues to identify a need for 573 affordable dpa. This Note acknowledges that the most recent assessment of affordable housing need for the City remains the 2016 SHMA, which identified a net affordable housing need of 573 homes per annum or 12,033 dwellings over the 2012-2033 period. We consider the need is now greater – this is a question for the Council who have data on waiting lists.

Q: 1.2 Does the provision for affordable housing in the Plan properly and pragmatically reflect that need?

2.3 We accept that Local Plans may not always be able to deliver on total affordable housing needs but in this case, the Council's forecast of 221 dwellings per annum appears to be less than half the requirement.

2.4 It is our case that the housing requirement overall could be increased and this in turn will improve the delivery of affordable dwellings.

Q 1.3 Should the housing requirement be uplifted to reflect the need for affordable housing?

2.5 We consider that the housing requirement could be uplifted to reflect the need for affordable housing without impacting significantly on the environment. Through our representations, there are opportunities to expand sites.



Q 1.4 What would be the effect of such an uplift?

2.6 Increasing the housing requirement overall would increase affordable housing delivery.

Q 1.5 Is Policy H10 soundly based and in accord with national policy?

2.7 We object to **part (v)** of Policy H10 in that it fails to understand the current dynamics of need and demands and how RSLs operate in taking 'blocks' of dwellings in developments to allow for better management.

2.8 Within larger developments, it is common to see groups of affordable dwellings in 'clusters' with these clusters being 10 or more affordable dwellings depending on the scale of a proposal. Equally, the size of the affordable dwellings is one which best matches 'need' and this can be in a range of 1-4 beds with 2-bed being the most in demand.

2.9 The range of bedroom sizes for market dwellings does not need to match pro-rata the affordable provision and on lower density allocations needs to reflect demand as well as need.

2.10 A more appropriate approach for larger strategic sites (250 dwellings) would be for each site to demonstrate its mix when the application is submitted. This is a matter for Policy H3.

2.11 The reference to vacant building credit in Policy H10 is also inaccurate in that where the VBC applies, it does not need to be demonstrated that it would 'incentivise' the development.

Q 1.6 Is the approach to OSFC a reasonable one?

2.12 While this is one for the Council, we do ask if OSFC would apply to the provision of Self Build – see para 5.29, affordable housing?

Q 1.7 Will the alternative source of supply (in Policy GB4) make any material difference in terms of supply?

2.13 This is one for the Council.