

**YORK LOCAL PLAN**

**EXAMINATION INTO THE SOUNDNESS OF THE CITY OF YORK LOCAL PLAN**

**Response to Inspector's Matters, Issues and Questions**

**Made on Behalf of Barratt and David Wilson Homes**

**Matter 1 – Affordable housing**

**Introduction**

1.1 These representations are made on behalf of Barratt and David Wilson Homes (Yorkshire East). Our Client has a number of strategic allocations and housing allocations across the city and has made representations at all stages of the plan, together with appearing at the Examination in Public. These representations should be read in conjunction with those representations and also our separate responses to the Councils housing needs assessment.

**1.1 What is the need for affordable housing?**

1.2 The 2016 SHMA shows a net requirement of 573 affordable homes per annum between 2012-2032. EX/CYC/36 is an affordable housing note produced in 2020 providing an update on the Councils position with regards to sources of affordable homes and delivery.

1.3 Table 11 of this document shows the historic completions, with significant shortfalls between 2012 – 2019. This table shows that gross completions were 693 homes, 17% of the affordable need.

1.4 This however does not include the loss of homes from right to buy, which is shown in Table 14. A comparison of these shows that in 2017/18 there was an overall loss of three homes and in 2018/19 an overall loss of four homes.

1.5 On this basis, given the lack of delivery from 2012 the actual need will be higher than that shown in the SHMA across the plan period that can deliver homes.

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

1.6 The Council accept that the level of affordable homes required will not be met through the provisions of the Local Plan, delivering only 38% of the required homes. The majority of new affordable homes will be delivered as part of open market sites, given the limited windfall opportunities. The overall level of homes also includes student accommodation, which provides no affordable homes and therefore the overall provision will reduce further.

- 1.7 Whilst the Council note the shortfall, the position has historically been that to deliver the level of affordable homes the overall target would be unsustainable. Whilst this may be the case, the Council's approach is considered to be too negative.
- 1.8 Our housing needs assessment provided with our original statements showed that York has the highest affordability ratio in the region, is significantly above regional and national averages and has grown more than any other area in the region. The affordability issue and the level of affordable homes in York is significantly worse than elsewhere and is a clear result of the lack of planning policy, the under provision of homes being built and the loss through the right to buy.
- 1.9 In a two year period the level of available affordable homes fell by seven, showing all of the issues raised above. The affordability ratio has widened and the opportunities for new homes to move into almost non-existent due to the lack of available sites.
- 1.10 The Local Plan provides an opportunity to change this by allocating new homes and providing the ability for the delivery of market and affordable homes. Whilst not meeting the full need there is an opportunity to meet more of the need than that currently being planned for. On this basis it is considered the Council's plan is not positively prepared.

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

- 1.11 Yes. Table 10 of the affordable housing paper shows the supply of affordable homes during the plan period. Excluding existing planning consents as at 1<sup>st</sup> April 2017 only 184 affordable homes are envisaged through housing delivery programme sites, windfall sites and the older persons programme. This is approximately 3-4 months of the whole plan requirement.
- 1.12 The issues with affordable homes in York can be clearly linked to the lack of an adopted plan. Given a plan is to be adopted, to not take this opportunity and seek to significantly uplift the available affordable homes through an uplift in the overall housing requirement is considered unsound.
- 1.13 As can be seen from the level of affordable homes likely to be delivered not through the allocation of homes to meet the housing requirement there is no other solution.

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

- 1.14 The effect would depend on the level of the uplift, however paragraphs 13 and 14 of EX/CYC/36 shows that an increase in capacity or new strategic sites would provide 22.9%. Further to this paragraph 19 shows that increasing the capacity or adding in new housing sites under five hectares can deliver 29.55%.

1.15 Therefore if the uplift was made up of new sites under five hectares one in three of all new homes would be affordable.

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

1.16 Our Client does not wish to comment on this question.

**1.6 Is the approach to OSFC a reasonable one?**

1.17 Our Client does not wish to comment on this question.

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

1.18 The Council's historic delivery shows the limited impact that this policy is likely to deliver. Paragraphs 24 and 25 of EX/CYC/36 show that since the 1<sup>st</sup> April 2017 only 12 affordable homes were granted planning permission at a rate of four per year.

1.19 It is clear that the only way to increase the levels of affordable homes are to increase the supply opportunities through positive planning in the Local plan and seeking to deliver more homes through increased allocations.