



# RESPONSE TO THE CITY OF YORK LOCAL PLAN EXAMINATION - MATTER 1

**YORK HOUSING ASSOCIATION,  
KARBON HOMES LTD., & KARBON  
DEVELOPMENTS LTD.**

YORK LOCAL PLAN: INSPECTORS' MATTERS, ISSUES AND  
QUESTIONS (PHASE 3)



# RESPONSE TO THE CITY OF YORK LOCAL PLAN EXAMINATION - MATTER 1

**On behalf of:** York Housing Association, Karbon Homes Ltd., &  
Karbon Developments Ltd.

**In respect of:** York Local Plan: Inspectors' Matters, Issues and  
Questions (Phase 3)

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## 1.0 Introduction

- 1.1 This Statement ('the Statement') is submitted on behalf of York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd to assist the Inspectors in their examination of the City of York Local Plan ('the Plan').
- 1.2 This Statement provides specific responses to the Inspector's matters, issues and questions set out in the Schedule of Matters, Issues and Questions document ('MiQ's') ([EX/INS/37](#)) published on 1st June 2022.

## 2.0 Response to Matter 1

- 2.1 As noted in the Phase 2 hearing sessions, we have serious concerns as to whether sufficient housing land is being put forward for development in the Plan. The insufficient supply of housing land directly and indirectly affects the provision of affordable housing in that a restricted supply of housing drives up land and house prices across the board and makes housing even more unaffordable and thereby hits the most vulnerable members of the community (those who need affordable housing) hardest of all.
- 2.2 The provision of additional land for housing development, in sustainable locations, would put the Plan on a sounder footing as it would deliver more affordable homes and help to address spiralling house price increases.
- 2.3 Notwithstanding those general (but highly interconnected) housing land concerns, we have considered the standalone issue of affordable housing and present our conclusions in response to the questions for Matter 1 below.

### Question 1.1

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

- 2.4 The Council's identified affordable housing need is 573 dwellings per annum. This was established in the Strategic Housing Market Assessment ('SHMA') produced in 2016, some 8 years ago. Despite numerous updates of the evidence base, including the SHMA, and the Housing Needs Update 2019, and materially worsening market conditions i.e., increases in rental costs as well as purchase costs, the affordable housing need has not been reassessed by the Council. It is more than likely that affordable housing need has increased since the previous assessment was undertaken.

### Question 1.2

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

- 2.5 Paragraph 60 of the NPPF 2021 notes that it is important that a sufficient amount and variety of land can come forward where it is needed, so that the needs of groups with specific housing requirements are addressed.
- 2.6 We strongly believe that the Council's overall housing strategy does not provide a proper and pragmatic response to the City's acute affordable housing need which is significant, and as such it is not consistent with the NPPF.
- 2.7 As we have set out in previous representations, in the first instance there remains significant need for additional affordable housing as a result of years of under-delivery. Indeed, between 2012/2013 and 2019/2020, the Council repeatedly fell short of delivering sufficient housing to meet the identified needs set out in the SHMA 2016 ([SD051](#)). **Table 1** (below) demonstrates that the Council has delivered just 356 net additional affordable dwellings over the eight years from 2012/13 to

2019/2020. The Council's identified affordable housing need is 573 dwellings per annum, or 4,584 dwellings over the eight years from 2012/13. A significant shortfall of 4,228 affordable dwellings has amassed over this time frame as illustrated by the table. The Council policy and stance fails to recognise its past woeful performance in respect of the provision of affordable homes.

*Table 1 - Total Affordable Housing Completions over the Period 2012/2013 to 2019/2020*

Year	Total Housing Completions	Additions to Affordable Housing Stock (Gross)	Additions to Affordable Housing Stock (Net of Right to Buy)	2016 SHMA Affordable Housing Need	Shortfall
2012/2013	482	129	105	573	-468
2013/2014	345	75	22	573	-551
2014/2015	507	128	76	573	-497
2015/2016	1,121	100	32	573	-541
2016/2017	977	136	57	573	-516
2017/2018	1,296	69	-3	573	-576
2018/2019	449	56	-4	573	-577
2019/2020	560	129	71	573	-502
<b>Total</b>	<b>5,737</b>	<b>822</b>	<b>356</b>	<b>4,585</b>	<b>-4,228</b>
<b>Average</b>	<b>717</b>	<b>103</b>	<b>45</b>	<b>573</b>	<b>-529</b>

- 2.8 Further, the Affordable Housing Update (2020) ([EX-CYC-36](#)) provides background on York's affordable housing delivery and explains that a projected total of 3,539 affordable homes will be provided over the plan period to 2032/2033 through the allocation of land in the Plan. This equates to an average of 221 affordable homes per annum – substantially below the 573dpa set out in the SHMA.
- 2.9 If the above is delivered, (we have our doubts and we will turn to this next), it will nevertheless see a year-on-year worsening of the affordable housing position.
- 2.10 Part of the problem is that the Plan sets out that a total of 2,534 affordable homes are to be brought forward on strategic sites ('ST sites') (equating to 71.6% of the total affordable dwellings over the Plan period). Whilst these sites are large and provide the opportunity to deliver a large percentage of the affordable dwellings needed, it is somewhat uncertain as to whether some of these can deliver the amount specified. Indeed, these sites are typically burdened by significant infrastructure costs, which can diminish the extent of affordable housing they can viably deliver.
- 2.11 We note that some of the strategic allocations will be difficult to deliver and will require significant infrastructure works to bring them forward. The British Sugar site (ST1) is a prime example. The scheme will only deliver a total of 3% of affordable housing within the initial phase of development

due to viability reasons and the increased costs for remediation; this is significantly below the 20% target sought.

- 2.12 Similarly, York Central (ST5), which is also a large brownfield site located in the City Centre, requires significant remediation and infrastructure works before construction can begin. The Council considers that ST5 will deliver 20% of the units as affordable accommodation; a total of 300 units during the plan period. On this basis alone, it is unlikely that the site will be able to deliver this number of affordable homes identified. Further, much of the housing on ST5 is likely to take the form of apartments which will have their own management companies which provide additional services, such as cinemas, dog walking and gyms. Apartment schemes do not provide affordable units on site. Apartment schemes such as ST5 may generate a contribution in lieu of providing on-site provision but this then begs the question where the Council spend the money providing this accommodation as the Plan proposes a very tight Green Belt and the City of York has a dense urban area. We will expand on this in relation to Question 1.7.
- 2.13 In addition to the above, the [Affordable Housing Update \(2020\) \(EX-CYC-36\)](#) identifies a number of strategic sites which, even if they did propose the full amount of affordable housing, would not deliver the full quantum of affordable housing within the Plan period. The report includes the following:
- York Central (estimated delivery of 2,500 dwellings, of which 500 affordable, but of which only 300 are estimated to come forward within the Plan period);
  - Land West of Wigginton Road (estimated delivery of 1,348 dwellings, of which 404 affordable, but of which only 378 are estimated to come forward within the Plan period);
  - Land West of Elvington Lane Road (estimated delivery of 3,339 dwellings, of which 858 affordable, but of which only 595 are estimated to come forward within the Plan period);
  - Imphal Barracks (estimated delivery of 769 dwellings, of which 154 affordable, but of which only 20 are estimated to come forward within the Plan period with the Ministry of Defence not due to dispose of the site until 2031)
- 2.14 All of the above means, in our view, that the Plan fails to provide a suitable provision of affordable housing to meeting either the 221dpa targeted within the Plan and gets nowhere near the 573dpa identified as being needed per annum.
- 2.15 Further, many of the affordable homes identified by the Council are to be delivered on the three garden village sites. Two of these garden villages are unsustainably located, at least, in the short-to-medium term and we doubt that ST14 will ever be sustainably located. In the Phase 2 sessions we made the point that the affordable homes provided will house some of the most vulnerable and disadvantaged people and families in our society. These locations will not have access to essential services/facilities and are therefore not appropriate for all of the people in need. Therefore, the allocations made do not reflect the need.
- 2.16 As we further noted in our Phase 2 hearing statement (responses to matter 2 - enclosed in Appendix 2), the Council have chosen not to uplift the housing requirement to take account of market signals. We note that the Council's own consultants recommended a 10% uplift to reflect

market signals in the SHMA 2016 (SD051) and subsequent Addendum 2016 (SD052), and again in the May 2017 Addendum Update (SD050). On all occasions, the Council neglected to uplift the requirement.

- 2.17 Ms Histon (Managing Director - York Housing Association) confirms that there is enormous pressure for affordable accommodation in York. Her evidence refers to separate case studies. In at least two of the case studies referred to, reference is made to a minimum three-year waiting list to gain access to an affordable home. As of 2021, there were 1,736 housing applications within North Yorkshire Home Choice seeking access to a house in the York area. Where Karbon Homes has, within the last year, sought applications for the Section 106 rental properties it has acquired from Persimmon Homes on their Germany Beck site in York, it invariably receives well in excess of 100 applications for each property on offer.
- 2.18 It is clear that there is an affordable housing crisis in York. Ignoring market signals and providing insufficient land to even provide 50% of the affordable housing need will only serve to exacerbate the situation further.
- 2.19 Although we accept that the Council probably cannot meet the entire affordable housing need that has been identified (and we accept the recognised legal position in this regard), we have seen no evidence of what the implications would be of actually meeting this need and therefore the level of any harm. Therefore, no judgement can be made as to whether or not it would be appropriate or not to meet the identified need.
- 2.20 Further, we know that the Council have historically identified a large number of reasonable alternative housing sites which the Council considered served no or a limited Green Belt purpose and indeed many were proposed housing allocations. Given the above, it is plain that the Plan can do more to meet the housing needs of the most vulnerable and disadvantaged people and families in York without undue harm and as such it should do.

### Question 1.3

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

- 2.21 To judge whether an uplift should be applied it is useful, in our view, to first consider the standard method.
- 2.22 The NPPF advises that the minimum number of homes needed should be calculated using the standard method. The standard method applies an affordability adjustment as household growth on its own is insufficient as an indicator of future housing need. Paragraph: 006 Reference ID: 2a-006-20190220 of the NPPG indicates that:

*“the affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes”.*

- 2.23 The standard method, as a minimum, would therefore start to address affordability issues. Therefore, it is our view that the City of York should, as a starting point, have a housing requirement of 1,028 dwellings per annum. This would at least begin to address the spiralling housing market and make a more significant erosion into the chronic shortage of affordable housing in York.
- 2.24 It is clear from the above that the Government considers that any figure lower than the minimum figure derived from the standard method would worsen the affordability crisis.
- 2.25 We note that the standard methodology figure of 1,028 dwellings per annum is the minimum number of new homes needed to start to address the affordability of homes. It is therefore plain that the minimum housing figure should be 1,028 dwellings per annum.
- 2.26 In the case of the Plan, we are considering a housing requirement derived from an OAN calculation.
- 2.27 In situations where market signals show a worsening of affordability or where there is a chronic shortage of affordable housing and there has been significant history of under provision and material degradation of supply through 'Right to Buy' it is plain that an uplift should be applied to the annual housing need figure.
- 2.28 Housing market signals have not been taken into account and clearly should have been and as such the Plan makes no real attempt to address the chronic and on-going under provision of affordable homes.

#### **Question 1.4**

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

- 2.29 It is our view that applying an uplift could only have a positive and beneficial effect. First, it would result in the provision of additional affordable homes which are desperately needed in the City.
- 2.30 An uplift would give rise to a requirement to identify additional sites (it would be no good just expanding the large ST sites as the delivery of the affordable homes would occur beyond the end of the plan period and this would not meet the needs of vulnerable families now) but the Council have already identified a number of reasonable alternative sites where development would not have any or any material impact on the Green Belt or other material considerations. These reasonable alternative sites are capable of delivering the affordable housing York desperately needs with minimal harm.
- 2.31 A further benefit of providing an uplift would have been the provision of a more robust Green Belt as it would reduce the need for an early review and therefore potentially avoiding the creation of what is likely to be only a temporary Green Belt if the Plan's housing requirement is adopted.

### Question 1.5

#### *Is Policy H10 soundly based and in accordance with national policy?*

- 2.32 Policy H10 sets out the affordable housing targets for new sites which typically falls between 20% and 30% depending on the number of units proposed and the site's location. However, the policy seeks the provision of affordable housing on sites of two or more dwellings. This is inconsistent with the approach outlined in the framework, which states that affordable housing should not be sought on developments of 9 or fewer dwellings (i.e. only major developments) unless the site falls within a designated area. None of York falls within a designated rural area.
- 2.33 The draft policy, containing various different thresholds for differing sizes and locations of development, seems unnecessarily convoluted. This is not necessarily a problem, but a more straightforward approach would be welcomed by most developers.
- 2.34 The inclusion of a mechanism to allow a lesser amount of affordable housing to be provided where development is unviable is understandable and standard practice, since it is evident some sites will come forward with abnormal constraints and these abnormal constraints increase costs, affecting the viability of providing affordable housing as part of every scheme. This accords with the NPPF and is acceptable.

### Question 1.6

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

- 2.35 We do not have an issue with allowing for off-site contributions in principle as, on certain sites, it is the only way to ensure delivery of affordable dwellings such as apartment schemes.
- 2.36 However, requiring OSFC on site between 2 and 15 homes is inconsistent with the approach outlined in the NPPF 2021 which clearly states at paragraph 64 "*provision of affordable housing should not be sought for residential developments that are not major developments.*"
- 2.37 The reason the framework has a threshold is that small sites can be more expensive to develop in comparison to larger sites. Burdening small development sites further may impact on the delivery of such opportunities.
- 2.38 Further, we do not understand why sites of 10 to 15 dwellings could not provide affordable homes. The framework certainly expects this. The Plan is therefore missing an opportunity to increase the number of affordable homes provided.
- 2.39 The provision of OSFC should occur only in exceptional circumstances rather than be the norm. The Policy appears to accept that OSFC are the norm.
- 2.40 A further and perhaps more significant problem with the OSFC element of this policy is where will the Council spend the contributions, particularly noting the tight Green Belt that the Plan proposes.

It is no good having a pot of money for the provision of affordable housing if there is no land available to build the homes.

### Question 1.7

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

- 2.41 We find it highly improbable that Policy GB4 will make a material difference in terms of affordable housing supply.
- 2.42 The policy does not suggest it has to meet policy GB1, but it clearly does as policy GB1 refers to “limited affordable housing”. As such, any proposals under policy GB4 would have to be assessed in the context of how the site performs in respect of openness, the purposes of including land in the Green Belt and the special character of York. These are high hurdles to cross and would put off most developers as any application would be extremely risky.
- 2.43 We note that planning approval for an 100% affordable housing scheme as a Green Belt was proposed under application **20/00752/FULM**. That proposal was for the erection of 60 affordable dwellings on land off Boroughbridge Road, and west of Trenchard Road, York that had been a draft allocation in an earlier iteration of the plan and by implication was seen as a suitable housing site at that time yet was later refused both initially and then on appeal.
- 2.44 This case casts significant doubts as to whether this policy will work in practice as intended to provide alternative supply.
- 2.45 Further, policy GB1, which is interlinked with GB4, clearly uses the words “limited affordable housing”. Therefore, notwithstanding the practical difficulties of securing planning permission in the Green Belt, the amount of dwellings this policy would provide will be small in number.



APPENDIX 1 - EVIDENCE OF JULIA HISTON (MANAGING DIRECTOR - YORK HOUSING ASSOCIATION) (JUNE 2021)

## **Appendix 1 - Evidence of Julia Histon**

### **Evidence of Julia Histon**

**June 2021**

## **York Local Plan: Inspectors' Matters, Issues and Questions**

### **1. Qualifications and Experience**

- 1.1 My name is Julia Histon. I am a professional Member of the Chartered Institute of Housing and hold a Postgraduate Diploma in Business Administration. I have worked in the fields of Housing and Regeneration for 35 years and at Director level for the last 15 years. I also have Non-Executive Director experience on Housing Association Boards. I have held my current role as Chief Executive / Managing Director of York Housing Association since 2011.

### **2. York Housing Association**

- 2.1 York Housing Association (YHA) is a small independent Housing Association registered with the Regulator of Social Housing and is a Community Benefit Society with charitable status. It has operated in York for over 55 years, having been established in 1964. YHA builds and manages affordable homes for people across York and North Yorkshire. It also has a long history of providing specialist supported housing for a wide variety of vulnerable people who need additional support to live independently.
- 2.2 YHA has been developing new homes throughout its history, however in 2017 the Board decided to seek a larger strategic partner to enable YHA to pursue larger scale development opportunities that would carry too much risk for a smaller organisation operating alone, and to achieve financial efficiencies in its back-office services to enable it to fund the development of more new homes. Karbon Homes was selected as the strategic partner following a formal process, and on 1 December 2017 YHA became an independent subsidiary within the Karbon Homes Group.
- 2.3 The Agreement between YHA and Karbon essentially allows for YHA to purchase all of its back-office services from Karbon (Finance, ICT, HR, Communications, and Development services); and in return YHA manages the new homes that Karbon develops in the Yorkshire area.

### **4. Demand**

- 4.1 The general case for demand has already been made by DPP in their submissions. However, I want to provide some recent experience (from allocating existing homes and other current new developments in York) of the difference that affordable and low-cost home ownership housing makes to real people's lives.
- 4.2 There is enormous pressure for affordable accommodation in York, not only from those currently on the housing waiting list [North Yorkshire Home Choice (NYHC)] who are looking for rented accommodation, but also the "squeezed middle", i.e. those who have the income to buy a house but lack a deposit or suitable credit history and would not qualify for rented affordable accommodation.

4.3 To secure an offer of an affordable home people must register on NYHC and identify the type of accommodation and location they are looking to move to. Applicants may indicate three areas of choice, although they may bid for any eligible property/area being advertised. Applications are reviewed and approved and banded (Gold, Silver, Bronze) based on their circumstances and priority for affordable housing. Applicants are then able to bid for vacant homes as they are advertised. Allocations of homes are awarded based on the highest bidder's priority.

4.4 Some detailed demand statistics from NYHC:

- There are currently 1736 housing applications within NYHC for the York area, which represents 23% of the wider sub regional register (standing at 7527 applicants overall) at 1 June 2021.
- The following table shows the number of applicants for different sizes of home in the York area.

Figure 8.2: North Yorkshire Home Choice – Preferences by Area, January 2021

NYHC Area	Assessed bedroom need					Total
	1-bed	2-bed	3-bed	4-bed	5-bed	
Carr (Acomb ward)	198	97	58	10	1	364
Chapelfields (Westfield ward)	217	107	55	8	1	388
Clifton and Rawcliffe (Skelton, Rawcliffe and Clifton Without ward and Clifton ward)	460	210	91	13	3	777
Cornlands and Lowfield (Westfield ward)	290	139	73	10	1	513
CYC West Villages (Rural West York ward)	204	96	70	10	3	383
Dringhouses and Foxwood (Westfield ward)	393	180	83	17	1	674
Lindsey (Holgate ward)	170	53	31	7	1	262
<b>Total - Areas of Choice Expressed</b>	<b>1,932</b>	<b>882</b>	<b>461</b>	<b>75</b>	<b>11</b>	<b>3,361</b>

Source: York Housing Association

- There are currently 94 applicants assessed as being eligible to bid on a bungalow.

4.5 Some very recent examples of demand include:

- 11 and 15 Waterside Court, Skelton. New 2-bed homes advertised on NYHC together received 68 bids.

- Ousebank, Skelton. New 3-bed home received 29 bids.
- 23 Bretgate, York. Existing sheltered housing for over 55's, first floor accommodation received 22 bids.
- 2 Bretgate, York. Existing social rented home providing ground floor 1 bed accommodation received 11 bids.
- 52 Faber Street, York. Existing 2-bed bungalow received 6 bids.
- Margaret Philipson Court, York. 1 bed apartment received 69 bids.

## 5. Case studies

5.1 In the last year YHA has been allocating affordable homes on two new developments currently under construction in York:

- Germany Beck in the Fulford area of York City, and
- Fairfield Croft in Skelton, a small village just outside of the City.

5.2 Many of the following real life case studies are taken from people YHA has allocated homes to in those developments over the last 12 months. Where names and addresses have been provided, these people have given consent for their circumstances to be shared. Where no specific name or address is provided, these are also real-life cases but where we have not had specific consent to share personal details and circumstances.

### Case 1.

Mr & Mrs Walgate, 48 Thornton Rd, Germany Beck. Allocated a 4 bed house

5.3 This family's story in their own words describes their housing history and the positive impact that an offer of a new home in York has had on their lives.

Testimony:

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To whom it may concern

*My name is Mrs Lisa Walgate. I am a mum of 4 Boys aged 18 17 10 & 6 and Married to Paul Walgate dad of all my 4 children. Three of my children have different disabilities which I shall go into as I go along. I'm emailing on behalf of York Housing Association, to praise our new build property and how life changing as a family it has been for us all.*

*We previously lived in a 3-bedroom property which was overly overcrowded, life was hard living in the conditions we were all living in due to the Boys disabilities. Declan age 17 has memory problems along with learning difficulties; Jayden age 10 has Autism; and Preston who is 6 was born with congenital heart disease which required open heart surgery to save his life. He had this surgery at 12 weeks of age, along with other disabilities. All my 3 children have lifelong disabilities that will not go away.*

*We applied to York Council to go on the bidding system for a bigger property as it was needed. We were told to expect at least a 3-4 year wait on gold band which we were awarded. I felt a little crushed by the news and did wonder how we would we ever manage another year living in the property we had under the circumstances we were living in.*

*The youngest boys were sharing a box room at 6ft by 9ft I only just managed to get 2 shorty beds in this room. There was no room for toys or anything and Jayden having Autism had a massive impact on my younger son Preston as he was constantly woken by Jayden in the night as he doesn't sleep. Me & Dad never got any sleep and Preston had to share our bed in the end due to the lack of sleep he was getting. My mental health took a massive turn for the worst as living the way we were wasn't helping. I tried my hardest to make the most of what we had but in reality it wasn't working. I lacked sleep, dad lacked sleep and works 12 hours shift. Jayden could not settle as he felt pend in. Preston couldn't settle because Jayden was up all night, and the vicious circle wouldn't end.*

*We couldn't eat together as a family as the kitchen was too small, only big enough to just fit 2 adults in so when anyone else in the household came into this room it caused chaos because no one could move around. It caused a lot of tension in the household with 6 of us sharing a small space with added disabilities on top.*

*Then along came a housing association (York) on the bidding system we applied for the property and won the bid. I couldn't believe our luck, 6 months of being on the bidding and they rang within the week and we we're the tenants to a new home that belonged to them. They were so very professional, explained everything to us what it would mean renting a York housing association home.*

*We feel it was built perfectly for us as a family! As now the 2 younger boys have their own rooms. Jayden has the space to have time out without feeling pend in, and he has things that help him get through the day with his Autism, fidget and sensory toys. Preston is now getting more sleep and has his own toys in his room which helps settle him to sleep. These things have a massive impact on a child's life when living with disabilities and at our old home we could not do or have these things as there just wasn't the room. Declan does not get as angry anymore as we are not living on top of each other (him and his older brother Brooklyn fought all the time).*

*We have space in the kitchen to prepare meals and eat together as a family again, something we all missed so much. Our physical and mental health has improved massively since getting this property in fact it has been life changing for us all.*

*I know there is so many families in our position and more housing in York is needed to help these families out. It's been an amazing transformation for me, and my family and I really hope the families in need can get access to a better life by more homes being built.*

*And I must say what a wonderful thing it would be if York housing association could deliver more properties to those in need in York and forever change the lives of the those struggling and also bring down that time frame of expectation of being on the bidding system from years to months.*

*Thankyou*

*Mrs L Walgate.*

## **Case 2.**

5.4 Leigh Hill, 46 Thornton Rd. Germany Beck. Allocated a 3 bedroom home.

Mother and two children, a daughter aged 9 and son aged 2 years old. Previously lived in a 1-bed flat owned by City of York Council.

Testimony:

*"My previous accommodation was with City of York Council where I lived in a 1-bedroom flat with two children, a daughter aged 9 and a son 2 years of age. The flat was situated on the 3<sup>rd</sup> floor and extremely damp. I had been on the housing waiting list for 3 years as I was only classed as Silver band. I was really struggling especially during lockdown, the children had no garden to play in etc and this eventually affected my mental health where I became very depressed and anxious. Due to my mental ill health, I was then upgraded to Gold band. When [YHA Housing Officer Susan Scott] contacted me with the offer of a brand-new property I just cried and cried and I must have driven her mad because I kept ringing her because I really could not believe it, a brand-new property Yay!*

*It changed my life in so many ways. I cannot even explain how amazing this has been. It also changed my children's lives because I am happier therefore, they are happier and can play in the garden and even have a paddling pool. They also now have a little dog which they love.*

*All I can say is I feel so lucky and so grateful so thank you!!!!!"*

## **Case 3.**

5.5 Mr & Mrs Winship, Harden Way, Germany Beck. Allocated a 4-bedroom rented home.

5.6 This family lived in a 2-bed terraced house with 4 children initially, although the eldest has since left home. They had been private renting in various homes for 15 years. The house was just too small for the needs of their family, with three children aged 2, 12, and 14 years old, and they had no garden. This led to Mrs Winship feeling depressed and anxious as and she could see no way out of their situation. They could not afford to buy a home.

Testimony:

Since being offered a new home at Germany Beck Mrs Winship has said it has been *'100% Life changing. I wake up every day and think we're on holiday or have won the lottery!'*

Email received:

**From:** Amelia Winship <[millywinship@gmail.com](mailto:millywinship@gmail.com)>  
**Sent:** Friday, January 29, 2021 3:08:21 PM  
**To:** Susan Scott <[Susan.Scott@yorkha.org.uk](mailto:Susan.Scott@yorkha.org.uk)>  
**Subject:** Re: tenancy agreement

*Hi that's fantastic thanks so much we are beyond happy it's amazing we are so thrilled and grateful; it is a dream come true. We have read and understood all on this tenancy agreement and cannot wait to move in and begin a long life there happily as a family.*

*Thanks Amelia and Adam Winship*

**Case 4.**

- 5.7 Germany Beck. This resident came from the women's refuge, fleeing domestic abuse. She has suffered from depression and anxiety so needs support from friends and family in York. She has never been in permanent accommodation and has had two previous relationship breakdowns which have resulted in her losing her home on both occasions. The offer of a permanent home has been pivotal to improving her wellbeing.

**Case group 5.**

- 5.8 Four of the households that have been rehoused in Germany Beck were living in James House, James Street prior to moving into their new homes. James House is City of York Council temporary accommodation. Some had been private renting and the landlord wanted to sell the property, so they had to move and had nowhere else to go. Another was living with family and had been asked to leave. Others were the result of relationship breakdowns. In all of these cases, the offer of an affordable home in York has enabled them to gain long term security from which to rebuild their lives.

**Case 6.**

- 5.9 Skelton – This female resident was rehoused from James House, James St. which is the Council's temporary accommodation. She had been private renting in York before that and ended up in temporary accommodation following a relationship break down when she was forced to flee domestic abuse. Having permanent accommodation in her own right provides her with long term security.

**Case 7.**

- 5.10 Skelton – A resident with her very sick child has been housed so she can be near York hospital and within train proximity to travel to Leeds hospital for her child's treatment. She also wanted to remain in York for family support. Whilst pleased with her new home, she would have benefitted even more from being within the York outer ring road as public transport to the hospital and train station is better.

**Case 8. Demand for Intermediate tenure routes into Home ownership.**

- 5.11 Family Y lived in an existing affordable rented home owned by YHA in Poppleton Gate House, York. The family were renting but wanted to get a foot on the property ladder. YHA were eager to support them to achieve this as it would free up a high demand social rented home in York for another family without the means to purchase. Unfortunately, there were very few intermediate tenure properties available in York and none were vacant at that time to enable them to part purchase, so they accepted a YHA Rent to Buy property in Carlton, Selby instead. However, they struggled to settle in Selby and missed their home city of York. So, when another YHA intermediate tenure

property became available in Richmond Street, York they chose to move back into the City. This disruption to the family was directly due to the lack of affordable homeownership options available in York.

- 5.12 The YHA housing team report lots of requests about 'Can I buy the house I'm living in?' As this option isn't yet available to most existing residents, the need for development of more intermediate tenures which provide routes into homeownership is high.

**Case 9. Demand for bungalows.**

- 5.13 An existing resident in YHA owned Tuke House, York was living in a small 1-bed apartment. She was struggling with mobility due to the small size of the property. She registered for rehousing on NYHC but could not get a bungalow as she was classed as adequately housed. Eventually, she was forced to move out of York to Scarborough to secure more suitable accommodation. This case provides clear evidence of the need for new affordable rented bungalows in York.
- 5.14 The Housing Team at YHA were able to cite numerous existing residents living in larger family accommodation who are struggling with stairs. Many resort to the use of aids and adaptations to their existing home rather than relocating to more suitable accommodation as this simply isn't available. In addition, the team cite many examples of moving people into accommodation that really isn't suitable for their declining health needs because there are insufficient bungalows or single storey homes available.

**6. Concluding remarks**

- 6.1 In summary, YHAs historic and recent experience evidenced through the case studies outlined, points to a very real demand for affordable homes in York to rent and to buy.
- 6.2 In addition to the data and examples provided here, we believe that there is a very high level of unmet demand for affordable homes in this area. Many people simply do not even register as they know they have very little chance of securing an affordable home whilst demand far outweighs supply. As a result, many households are living in insecure private rented sector or temporary accommodation.

## APPENDIX 2 – DPP PHASE 2 RESPONSE TO MATTER 2

## Matter 2 - Housing Need and Requirement

### Made on behalf of York Housing Association, Karbon Homes Ltd, & Karbon Developments

#### The Objectively Assessed Housing Need (the 'OAHN')

##### Question 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')?"*

*b) What bearing, if any, does the 'standard method' have on this Plan's OAHN or on any other aspect of the Plan's approach to housing?"*

- 1.1 Paragraph 61 of the NPPF 2021 requires strategic policies to be informed by a local housing needs assessment in the form of the standard method. The only exception to this is for the purpose of examining plans. Paragraph 220 indicates that plans submitted for examination on or before the 24<sup>th</sup> January 2019 will continue to be assessed against the NPPF 2012. The Plan was submitted on 25<sup>th</sup> May 2018, before the 24<sup>th</sup> January 2019 deadline. Therefore, we agree that, at face value, it would be appropriate to use the OAHN method as the basis for calculating the housing requirement.
- 1.2 However, Paragraph 33 of NPPF 2021 requires policies in local plans and spatial development strategies to be reviewed and updated as necessary and at least once every five years. It also indicates that relevant strategic policies will need updating if their applicable local housing need figure has changed significantly. Our reading of Paragraph 33 this is that there are two tests; the first is that the Plan should be updated at least once every five years and the second relates to a situation where local housing need figure has changed significantly or is expected to change significantly.
- 1.3 The standard method for York, using the latest data, indicates that the minimum housing requirement is 1,013 dwellings per annum. The Plan's current annual housing requirement, based on OAHN, is only 790 with an uplift of 32 units in respect of historic under delivery taking the total figure to 822. There is no doubt that the housing requirement calculated using OAHN, when compared to the standard method, produces a significantly different figure. Indeed, the difference is a 23% increase in the annual housing requirement above the 822 figure. This is significantly different and could conceivably trigger an immediate review of the housing requirement. In any event the Plan will have to be reviewed within the 5 years and this review will need to be undertaken using the standard method.
- 1.4 Based on our calculation, using the standard method, the Council would have to increase the housing requirement in the Plan by a minimum of 191 dwellings per annum. The Council will

therefore have to find a significant amount of additional housing land in order to meet the new and increased housing requirement for the district and this will mean additional land will almost certainly have to be found within the recently adopted Green Belt.

- 1.5 Paragraph 137 of the NPPF 2021 indicates that one of the essential characteristics of Green Belts is their permanence. Paragraph 140 goes on to indicate that once established, Green Belt boundaries should only be altered where there are exceptional circumstances and notes that strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Paragraph 143 also indicates that plans should be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period.
- 1.6 The Plan seeks to define, for the first time, an adopted Green Belt. It is our view that the uplift in the housing requirement, resulting from the review process, would require the amendment of the recently defined Green Belt and this would happen only a few short years after its adoption. This would mean that the Green Belt was anything but permanent. This is the same situation that the Council were in when they produced the DCLP but there the Council position was more overt as they referred to the Green Belt being only temporary.

*c) Have market signals been taken into account and, if so, what effect have they had on calculating the OAHN?*

- 1.7 The NPPG 2012 notes that although demographic projections are trend-based, they need to be adjusted to take account of factors that are not captured by those trends, including past undersupply, market signals and future job growth.
- 1.8 The Housing Need Update (2020) ([EX-CYC-43A](#)) uses household projections to inform the OAHN figure of 790 dwellings per annum, with an uplift of 32 dwellings per annum added on to account for the past under supply calculated between 2012-2017. The housing requirement in the Plan equates to 822 dwellings per annum. This incorporates past undersupply (up to a point) but does not take into account market signals.
- 1.9 We note that the Council's own consultants recommended a 10% uplift to reflect market signals in the SHMA 2016 ([SD051](#)) and the subsequent Addendum 2016 ([SD052](#)) and again in the May 2017 Addendum Update ([SD050](#)). However, when the reports were presented to the Local Plan Working Group ('LPWG') in July 2017, the LPWG ([10/07/2017](#)) resolved to reject the increased OAHN stating that:

*"The recommendation prepared by GL Hearn in the draft Strategic Housing Market Assessment, to apply a further 10% to the above figure for market signals (to 953 dwellings per annum), is not accepted on the basis that GL Hearn's conclusions were speculative and arbitrary, rely too heavily on recent short-term unrepresentative trends and attach little or no weight to the special character and setting of York and other environmental considerations."*

- 1.10 Housing affordability in York is a worsening issue and is one that the City of York are clearly aware of. The SHMA 2016 ([SD051](#)) indicates that for the period by 2012/2013, the median affordability ratio in York was 6.74 but in 2019/2020 the median affordability ratio was 8.22 as demonstrated in Table 1 below. The median affordability ratio has worsened by 22% in the City of York over this 8-year period from 2012/2013. This means it now costs the average worker in the City of York 8.22 times their earnings to afford a house, which represents a significant barrier to homeownership.
- 1.11 When comparing the City of York’s affordability ratio to the national and regional ratios, **Table 1** shows that York has a much higher affordability ratio than the regional average, and also just above the national average which takes into account such areas as London and the southeast. The table also highlights the change in the affordability ratio between 2012/2013 and 2019/2020. The national ratio worsened by a total of 16.4% and the regional ratio by 10.7% over this same period. This shows that York has experienced worsening affordability over the 8-year period, at which time the Plan was being prepared compared to the regional position and the position in England.

	Median Affordability Ratio 2012/2013	Median Affordability Ratio 2019/2020	Difference	Increase (%)
York	6.74	8.22	+1.48	22.0%
Yorkshire and the Humber	5.35	5.92	+0.57	10.7%
England	6.77	7.88	+1.11	16.4%

*Table 1 – Comparison of Affordability Ratios between City of York, Yorkshire and the Humber and the National Average.*

*Data Source: Table 2c and 5c of Ratio of House Price to Workplace Based Earnings published March 2021*

- 1.12 Further, in 2019/20, the average house price in the City of York was £245,000, some £78,050 or 47% higher than the regional average house price in Yorkshire and the Humber of £166,950.
- 1.13 In terms of affordable housing, the delivery of such housing in the City has fluctuated considerably between 2012/2013 and 2019/2020 and the delivery is falling substantially short of the identified needs set out in the SHMA 2016 ([SD051](#)). Table 2 demonstrates that the Council has delivered just 356 net additional affordable dwellings over the eight years from 2012/13 to 2019/2020. The Council’s identified affordable housing need is 573 dwellings per annum, or 4,584 dwellings over the eight years from 2012/13. A significant shortfall of 4,228 affordable dwellings has amassed over this time frame as demonstrated in **Table 2**.

Year	Total Housing Completions	Additions to Affordable Housing Stock (Gross)	Additions to Affordable Housing Stock (Net of Right to Buy)	2016 SHMA Affordable Housing Need	Shortfall
2012/2013	482	129	105	573	-468
2013/2014	345	75	22	573	-551
2014/2015	507	128	76	573	-497
2015/2016	1,121	100	32	573	-541
2016/2017	977	136	57	573	-516
2017/2018	1,296	69	-3	573	-576
2018/2019	449	56	-4	573	-577
2019/2020	560	129	71	573	-502
<b>Total</b>	<b>5,737</b>	<b>822</b>	<b>356</b>	<b>4,585</b>	<b>-4,228</b>
<b>Average</b>	<b>717</b>	<b>103</b>	<b>45</b>	<b>573</b>	<b>-529</b>

Table 2 – Total Affordable Housing Completions over the Period 2012/2013 to 2019/2020

- 1.14 Whilst it is improbable that the Council will deliver the level of affordable housing needed, it is important not lose sight of the fact that Table 2 reflects the significant undersupply of affordable homes against the recognised need. It is clear from Table 2 that the proposed housing requirement in the Plan should take into account the shortfall of 4,228 affordable dwellings that have amassed over the past 8-year period to date and also deliver more housing and therefore more affordable dwellings over the new Plan period.
- 1.15 The [Affordable Housing Update \(2020\) \(EX-CYC-36\)](#) provides background on York’s affordable housing delivery and explains that a projected total of 3,539 affordable homes will be provided over the plan period to 2032/2033 through the allocation of land in the Plan. This equates to an average of 221 affordable homes per annum – substantially below the 573dpa need highlighted in the 2016 SHMA ([SD051](#)). This can only worsen the ability of those most in need of housing to find a home.
- 1.16 It is our view that the Plan fails to allocate enough housing sites and land to even start to meet the affordable homes needed in York. The Plan therefore appears to ignore the needs of these members of society most in need of housing.
- 1.17 Further, emerging policy H10 sets out the affordable housing targets for new sites which typically falls between 20% and 30% depending on the number of units proposed and the site’s location. However, the policy also allows developments to deliver a lesser amount of affordable housing

where it is demonstrated through a viability assessment that to do so would result in the scheme becoming unviable.

- 1.18 The Plan sets out that a total of 2,534 affordable homes are to be brought forward on strategic sites ('ST sites') (equating to 71.6% of the total affordable dwellings over the Plan period). Whilst these sites are large and provide the opportunity to deliver a large percentage of the affordable dwellings needed, it is somewhat uncertain as to whether these can deliver the amount specified, given that a viability assessment can be submitted to vary the amount of affordable housing, and when these homes will be provided.
- 1.19 In particular, we note that some of the allocations will be difficult to deliver and will require significant infrastructure works to bring them forward. For example, the British Sugar site, known as ST1, is a prime example where a smaller percentage of affordable housing has been agreed than the required at 20%. It was agreed as part of the application, which was allowed on appeal following non-determination by the Council, that ST1 will only bring forward a total of 3% of affordable housing within the initial phase of development due to viability reasons and the increased costs for remediation given the past history of the site. This shows that a policy compliant level of affordable housing cannot be guaranteed on each site, and this will further add to the shortfall in affordable housing.
- 1.20 Similarly, York Central (ST5), which is also a large brownfield site located in the City Centre, requires significant remediation and infrastructure works before works can begin. These costs are likely to be much higher than on any greenfield site and are likely to result in the significant reduction of the affordable housing provision.
- 1.21 In addition to the above, the [Affordable Housing Update \(2020\) \(EX-CYC-36\)](#) identifies a number of strategic sites which, even if they did propose the full amount of affordable housing, would not deliver the full quantum of affordable housing within the Plan period. The report includes the following:
- York Central (estimated delivery of 2,500 dwellings, of which 500 affordable, but of which only 300 are estimated to come forward within the Plan period);
  - Land West of Wigginton Road (estimated delivery of 1,348 dwellings, of which 404 affordable, but of which only 378 are estimated to come forward within the Plan period);
  - Land West of Elvington Lane Road (estimated delivery of 3,339 dwellings, of which 858 affordable, but of which only 595 are estimated to come forward within the Plan period);
  - Imphal Barracks (estimated delivery of 769 dwellings, of which 154 affordable, but of which only 20 are estimated to come forward within the Plan period with the Ministry of Defence not due to dispose of the site until 2031)
- 1.22 All of the above means, in our view, that the affordable provision will fall below the 221dpa indicated in the Plan, and even further below the 573dpa identified as being needed.
- 1.23 We would like to take this opportunity to highlight the fact that the chronic shortage of affordable housing across York continues to give rise to significant real-life consequences. We

have attached evidence prepared by Julia Histon, Chief Executive / Managing Director of York Housing Association, at **Appendix 1**. The evidence provided demonstrates that demand for affordable housing continues to rise, and that there is an overwhelming need for additional affordable units in the City. The evidence provided demonstrates that demand for affordable housing continues to rise, and that there is an overwhelming need for additional affordable units in the city. The City has a housing crisis which goes way beyond any statistical considerations of the housing requirement.

- 1.24 York Housing Association constantly receives inquiries from Key Workers such as nurses who after long 12-hour shifts are forced to drive 15 to 25 miles to outlying towns and villages to find accommodation that is affordable to them. Given current pressures on the cost of living this affordability issue can only get worse in years to come.
- 1.25 The evidence provides various case studies and testimonies of individuals or families desperately seeking to access affordable housing in York. As a result, many households are living in insecure private rented sector or temporary accommodation. The evidence demonstrates that the issues associated with the chronic shortage of affordable housing are worsening, and that it is therefore essential that the Plan addresses such issues. It is no comfort to a homeless person, someone sofa surfing, or the Nurse mentioned above that there may be a dwelling for them in fifteen to twenty years' time at the end of the plan period.
- 1.26 In situations where market signals show a worsening of affordability or where there is a chronic shortage of affordable housing, such as in York, then an uplift is often applied to the annual housing need figure..
- 1.27 It is our view that housing market signals have not been taken into account and clearly should have been and no real attempt has been made in the Plan to address the chronic and on-going under provision of affordable homes.

*d) 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?*

- 1.28 The OAHN is based on household projections which were tested against the economic-led housing need figure. As both assessments were similar, we understand that no uplift was applied for future job growth.
- 1.29 We understand that the housing requirement of 790 dwellings is based solely on demographic projections.
- 1.30 We accept that the household projections would also have included an element of growth derived from economic expansion in the past, as this would be built into the trend, but it is not clear whether the additional 650 jobs per annum is more than historically created. If 650 jobs per annum are created these will not all be filled by existing residents and therefore it is likely to

generate a need for additional housing over and above that allowed for in the household projections. At face value, we cannot see how an uplift is not justified.

*e) Overall, has the OAHN figure been arrived at on the basis of a robust methodology and is it justified?*

1.31 It is considered that the OAHN does not reflect the Council employment growth ambitions, nor does it take into account the clear market signals which were recognised by the Council’s own advisors but ignored. The housing requirement does not seek to address the affordable housing crisis in York. The OAHN is therefore not justified.

1.32 Further, it is our view that the Council have sought to reduce the housing requirement through the various stages of the Plan process, as demonstrated in the table below.

Stage of Plan	Housing Requirement (PA)
Local Plan Preferred Options (2013)	1,090
Publication Draft Local Plan (2014)	996
Preferred Sites Local Plan (2016)	841
Publication Draft Local Plan (2017)	867
Publication Draft Regulation 19 (2018)	867
Proposed Modifications Consultation (2019)	822

*Table 3 - Housing Requirement over the Various Stages of the Plan*

1.33 As evidenced in the **Table 3**, the housing requirement in the 2013 version of the Plan Preferred Options document was 1,090. When compared with the latest housing requirement of 822pda, this represents a reduction of 268 per annum. We consider that the standard method which indicates a minimum housing requirement of 1,013 dwellings per annum is a better reflection of the true housing need and indeed we note produces a figure which is closer to the original housing requirement set out in the 2013 version of the Plan.

1.34 It is considered that the methodology used is not robust or justified.

1.35 It is clearly evident that that the housing requirement should be over 1,000 dwellings per annum – a similar level to that which would be generated by the use of the standard methodology and as set out in the 2013 version of the Plan.

## The Housing Requirement

### Question 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?*

- 1.36 As part of the preparation of the Plan an uplift for the shortfall in housing delivery between 2012-2017 was added to the annual housing requirement, and thus taking the requirement from 790dpa to 822dpa.

Year	Gross Completion	Net Dwelling Gain	Shortfall against targeted 790dpa
<b>2016-2017</b>	996	977	+187
<b>2015-2016</b>	1,171	1,121	+331
<b>2014-2015</b>	523	507	-283
<b>2013-2014</b>	374	345	-445
<b>2012-2013</b>	540	482	-308
<b>Total</b>			-518

*Table 4 - Housing Completions 2012 – 2017*

- 1.37 Since then, it is clear that there has been a further shortfall in housing completions between 2017-2021. The table below sets out the housing completions. Over the proceeding 4 years there has been a further shortfall of 233 units.

Year	Gross Completion	Net Dwelling Gain	Shortfall against targeted 790dpa
<b>2020-2021</b>	643	622	-168
<b>2019-2020</b>	596	560	-230
<b>2018-2019</b>	481	449	-341
<b>2017-2018</b>	1,336	1,296	+506
<b>Total</b>			-233

*Table 5 - Housing Completions 2017 - 2021*

- 1.38 The additional shortfall figure therefore needs to be increased to reflect the additional period of under delivery within the City.

### Question 2.5

*Overall, is the housing requirement figure now proposed underpinned by robust evidence and adequately justified?*

- 1.39 Covered in our response to question 2.2(e).

### Conclusion

- 1.40 To conclude, we consider that the housing requirement in the Plan does not take into account the clear market signals, make any real attempt to address the chronic shortfall in historic affordable housing under provision or even meet the affordable housing needs of the city going forward and does not appear to properly take into account economic growth. Whilst calculating

the housing requirement using the OAHN is technically correct it will almost certainly prove problematic by the time that the first review of the Plan is required. The transition from using the OAN to the standard method will leave the Council with a significant shortfall of housing land and the Council will not be able to meet the increased requirement without reviewing the Green Belt – which undermines the permanence of the boundaries proposed by the Council. On this basis, we maintain that the Plan is not justified, it will not be effective and has not been positively prepared and is not consistent with national policy and is ultimately not sound.

## **Modification**

- 1.41 To make the Plan sound the Council need to find additional land for development to ensure that the Green Belt, once defined, remains permanent. It is our view that additional small and medium sized sites should be identified as well as potentially increasing the size of some of the most sustainable allocations such as ST9.
- 1.42 To make the Plan sound an uplift to the housing requirement should therefore be applied in the order of 25% to 30%.