

City of York Council
Examination of the City of York Local Plan
2017 – 2033

Phase 3 Hearings

Matter 3
Student Housing

SUBMISSION ON BEHALF OF:

Galtres Garden Village Development Company
Ref: SID 620

RESPONSE TO SCHEDULE OF MATTERS, ISSUES
AND QUESTIONS FOR THE EXAMINATION



Chartered Town Planning Consultants

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1.0 RESPONSE TO MATTER 3 – Student housing

REF: 220704.gvdc.exam3sh

MATTER 3 – STUDENT HOUSING

Introduction

This statement has been prepared on behalf of Galtres Garden Village Development Company (GGVDC) who have submitted representations at all stages of the Emerging Local Plan. That is representations on:

- Local Plan Preferred Sites consultation August 2016
- Local Plan Pre-Publication Draft (regulation 18 Consultation) Sept 2017
- Submission Draft Local Plan May 2018
- Local Plan Proposed Modifications Consultation June 2019:
- Proposed Modifications and Evidence Base Consultation June 2021

The GGVDC refence is SID620

GDDVC also attend the Phase 1 hearings in December 2019 for Matters 1, 2 and 3, and the Phase 2 hearings in May 2022 on Matters 2, 4, 5 and 7

National Policy Context

- (i) The NPPF 2012 sets out the process for local plan preparation and in particular the establishment of Green Belt boundaries. At its heart is the presumption in favour of sustainable development, (para14). One of the principles underpinning plan making is that local planning authorities are tasked to objectively identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. For housing, plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area (Para 17).
- (ii) To **boost significantly** the supply of housing (para 47) local Planning Authorities should use their evidence base:
 - to ensure their local plan meets the full objectively assesses needs for market housing;
 - identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements
 - identify a supply of specific developable site or broad locations for growth
 - for market and affordable housing illustrate the expected rate of housing delivery through a housing trajectory for the plan period

- (iii) Local plans should be consistent with the principles and policies set out in the Framework, including the presumption in favour of sustainable development, (para 151). They should be aspirational but realistic and they should address the spatial implications of economic, social and environmental change (para 154).
- (iv) Each LPA should ensure that the Local Plan is based on adequate, up to date and relevant evidence about the economic, social and environmental characteristics and prospects of the area, (Para 158). They should have a clear understanding of housing need in their area and should prepare a Strategic Housing Market Assessment to ensure they meet household and population projections and cater for housing demand and the scale of housing supply necessary to meet this demand (Para159).
- (v) The Local Plan submitted for examination should be 'sound', that is. positively prepared; justified; effective and consistent with national policy, (Para 182).

INSPECTORS QUESTIONS

Context

Galtres Garden village Development Company (GGVDC) have no particular issue with the detail of student housing policies. Our primary concern relates to the distorting effect of including student units in the housing completion data.

3.1 What is the need for student housing?

3.1.1 This issue is covered in some detail in representations by education establishments at the various consultation stages of the Local Plan and in response to matters at Phase 2. Those representations have evidenced the significant growth in student numbers. In particular, representations by the University of York indicate that increase in student numbers averaged just over 4.0% over the last decade. Student numbers are expected to increase by a further c. 1,400 between 2022 and 2027 and continue growing beyond that.

3.2 Is the general approach of the Plan to student housing justified?

3.2.1 Universities and other education establishment and their students contribute significantly to the social and cultural life of the city and have a significant positive economic benefit for the City. Not all students can be accommodated on campus and other student accommodation is therefore required in the City in the form of purpose built student accommodation (PBSA) or HMO's.

3.2.2 Whilst we take no issue with off campus student accommodation provision, there are several consequences to this. The most obvious is that many PBSA schemes are on brownfield sites that are also suitable for housing, and therefore reduces the supply of brownfield housing sites.

3.2.3 The second impact arises from the way student units are included in the housing completion figures. We have addressed this issue at some length in our representation at the various stages of the local plan – most recently in our representations on the 2021 Modifications (Reps ref SID 620).

3.2.4 This might not be an issue in an Authority with a low rate of student completions relative to a larger housing requirement or where there were large strategic allocations to, essentially, offset the impact of student completions.

3.2.5 Unfortunately, this is not the case in York. Council housing Monitoring data shows that between for the monitoring years 2012/13 – 2020/21, there were 6,359 completions of which 1,466 – or 23% - were accounted by student units. For 2022/23 the Council’s Housing Trajectory EX/CYC/69 is 1,042 housing completions of which 385 - or 37% - will be student completions.

Table 1 – Housing Completions in York 2012/12 to

Year	Net Dwellings Added (Council Figures)	Less student units	Net C3 Dwelling units	Local PLAN Mod OAN	Backlog/ Surplus	Housing delivery test indicator
2012/13	482	0	482	790	-308	61.0%
2013/14	345	0	345	790	-445	43.7%
2014/15	507	0	507	790	-283	64.2%
2015/16	1121	579	542	790	-248	68.6%
2016/17	977	152	825	790	35	104.4%
2012/17	3432	731	2701	3950	-1249	
2017/18	1296	637	659	790	-131	83.4%
2018/19	449	40	409	790	-381	51.8%
2019/20	560	39	521	790	-269	65.9%
2020/21	622	19	603	790	-187	76.3%
2017/20	2927	735	2192	3160	-968	
Total	6,359	1,466	4,893	7,110	-2,217	68.8%

3.2.6 The 2016 SHMA identified that the primary requirement for housing in York was for 2 and 3 bed family houses (SD051 paragraph11.42). It did not identify any specific requirement for student housing. The inclusion of such a high level of student completions as housing completions has a distorting effect on the supply of housing in the City, giving a misleading impression that housing needs are being met. These student completions are not ‘on top’ of completions for general housing. They have, by default, become a key component of housing supply in recent years, but clearly do not address the primary requirement for family housing identified in the SHMA. Indeed the SHMA indicates that the inclusion of student completions in the housing supply to the extent they are is not justified.

3.2.7 In our 2021 representations on proposed modification and previous representations we accepted that whilst national planning guidance says student units can be included in the completion figures, that must be

“...based on the amount of accommodation it releases in the housing market.”
Planning Practice Guidance Reference Paragraph: 034 Reference ID: 68-034-20190722
Revision date: 22 July 2019

3.2.8 The Council have not demonstrated to what extent the PBSA has released accommodation back into the housing market.

3.2.9 Indeed, the available evidence presented in the June 2016 SMA is that new purpose-built student accommodation has not displaced students from market or family housing. Paragraph 10.67 of the SHMA states:

We have undertaken some qualitative research on the student housing market. This revealed there was an increase in capacity as new purpose-built accommodation has been built on and off campus. However, it was discovered that this did not reduce demand for traditional private sector shared housing.

3.2.10 The views of local agents on the private rented student sector were also sought. The SHMA reports that:

Our question to the letting agent was about the impact on the City's housing market on the growth of student numbers and increased capacity from recent construction of purpose-built accommodation for students both on and off campus. According to the University of York website, over 2,000 units of student accommodation had been made available within the Heslington East campus which doubled the 'on campus' capacity. The agent told us that demand for private rented student sector remained strong and expressed no concerns about demand moving forward. The agent conceded that on campus capacity for students had increased but this was mainly taken up by first year students. We were told that supply from purpose built and shared private lets was keeping up with demand and more supply would come on stream in 2015/16. We were told that no market restructuring was underway as has become evident in other cities that we have studied such as nearby Hull and the City of Lincoln. (SD051Para10.77)

3.2.11 When questioned about shared student those being released back into the market the SHMA reports that:

We asked city centre re-sale estate agents if there was evidence of shared student houses being returned to the market for sale or residential lettings currently or recently. Agents told us that there was no evidence of this. This supports the evidence provided by the specialist agent. (SD051Para10.78)

3.3 *Is Policy H7 reasonable?*

See response to question 3.4

3.4 *Will it adequately address the need for student housing?*

3.4.1 Policy H7 provides a framework for others to deliver student housing. Apart from the relatively small allocation – SH1, it does not directly address the question of student housing need.

3.5 *Is allocation SH1 soundly based and sufficient?*

3.5.1 We have no comment on this question

3.6 *Is the manner in which Policy H8 approaches HMOs justified?*

3.6.1 As the Plan acknowledges, HMO's have a useful role to play in adding to the overall housing supply and catering for people requiring accommodation in the short term, for example students, people on secondments, people moving house etc..... HMO's can reduce pressure for family housing to be used as short term accommodation but some level of control is required to maintain balanced communities.