

**York Local Plan Preferred Options – Summary Of Responses**  
**Section 12: Affordable Housing**

**April 2014**

<b>Policy, Site, Table, Figure, Para etc.</b>	<b>Comments</b>	<b>Ref.</b>	<b>Name (where business or organisation)</b>
<b>General</b>	<p>Objection – Evidence Base – concerned with the assumptions made in the Affordable Housing Viability Study (AHVS) and do not consider it a sound basis upon which to base a plan. The AHVS does not properly factor in the cost of building to the Code for Sustainable Homes 4, even though this was a requirement of the previous Core Strategy and remains a requirement in Policy CC2 of the Local Plan. The AHVS does not adequately take account of the viability implications of other plan policies and obligations. The AHVS does not include sufficient residual land values to induce a sale – the NPPF (para 173) is clear that the costs of development must have regard to providing competitive returns to a willing land owner. The AHVS is already out of date and would need to be updated prior to submission of the Local Plan. The Council has subsequently produced a Local Area Wide Viability Study; it does not assist in the viability argument as the study has not fully tested all the Local Plan policies and obligations for their cumulative impact on viability.</p>	673/16849	Taylor Wimpey UK Ltd
		1514/17480	Monks Cross North Consortium
	<p>Objection – disagree with the Council’s preferred approach for affordable housing. The cost of providing the level of affordable housing proposed is not achievable for small local housebuilders. Small infill sites will not be developed due to them not being financially viable. As an alternative approach, 10% affordable housing for sites with more than 10 units proposed and no affordable housing or contribution for 10 units or less proposed. This will result in smaller local housebuilders staying in business, infill sites being developed and more affordable housing being built on smaller sites.</p>	2053/923	Moorside Developments Ltd
	<p>Support – agree with the preferred approach to affordable housing.</p>	3356/8575	
<p>Support – agree with the preferred approach to affordable housing.</p>	6518/16402	York Green Party	

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<b>Policy, Site, Table, Figure, Para etc.</b>	<b>Comments</b>	<b>Ref.</b>	<b>Name (where business or organisation)</b>
<b>Policy AH1 Affordable Housing</b>	Objection – do not agree with the Preferred Option to guide affordable housing requirements, would recommend Option 1 be adopted.	77/12768	Strensall with Towthorpe Parish Council
	Objection – Policy AH1 requires affordable housing to be provided in line with current annual dynamic targets and thresholds. Paragraph 12.5 advises that these will be subject to annual review. However, NPPF requires local planning authorities to set out their policy on local standards in Local Plan, including requirements for affordable housing. Not clear on what basis annual dynamic targets will be tested. No objections to reviewing targets provided it is properly done as part of the plan-making process, is based on robust evidence provided within an up-to-date Strategic Housing Market Assessment and Viability Appraisal, and is subject to public scrutiny. Therefore, request that the plan sets a clear affordable housing target in the first place. Support – support for Policy AH1 (iv) which enables use of off site financial contributions towards affordable housing and the inclusion of last paragraph within Policy AH1 which provides the opportunity to undertake open book appraisal to demonstrate that a development would not be viable based on current affordable housing targets.	144/12887	Hogg Builders (York) Ltd
	Objection – the use of annual dynamic targets will create significant uncertainty to the development industry, which will inhibit the delivery of housing in York. Should fully test the cumulative impacts of all policies and obligations for their impact on viability. Should be used to set upper limit for its affordable housing requirement which could be deliverable in the first 5 years of the Plan and not threaten the viability of schemes under current economic conditions.	145/13870	Home Builders Federation
	Comment – broadly welcome the statement on affordable housing, but would prefer greater transparency describing precisely when, how and by who the annual dynamic target will be set. Would also welcome greater clarity on the policy statement: " <i>Where the above criteria can not be met, developers have the flexibility through open book appraisal to demonstrate to the Council's satisfaction that the development would not be viable, based on current affordable housing dynamic targets</i> " – it is unclear what the criteria are and how satisfaction would be measured.	178/13904	York Council for Voluntary Service
	Objection – concerned that the Policy and in particular the approach to viability set out in the Affordable Housing Viability Study will have adverse impacts on residential development in the City. Concerned that the approach to land value adopted in the viability study will discourage landowners from releasing land for housing development, which is essential to economic growth and recovery.	187/13920	York & North Yorkshire Chamber of Commerce

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<b>Policy AH1 Affordable Housing Continued</b>	<p>Comment – off site financial contribution should reflect market area value where original houses are being built and not market area value where the home is actually built. Under the proposals, achieving affordable housing in the villages is unlikely (other than by exceptional sites in the Green Belt) as the majority of housing sites has always tended to be small.</p>	192/14008	
	<p>Objection – should base affordable tenure mix on an objectively assessed need approach rather than a policy based requirement. Regard should therefore be had to the inclusion of the affordable rent tenure as set out within the HCA Affordable Homes Programme 2011/15. In respect of integration of affordable housing with market housing on a pro rata bases by pepper potting, there is no justification for assuming such a relationship between market demand and affordable housing needs. The draft pro rata approach could jeopardise the delivery of residential developments within the city and/or result in a mismatch between needs and provision with serious potential issues of under occupation.</p>	434/16575	Associated British Foods plc
	<p>Objection – proper and full regard must be had to the overall viability of schemes in setting any requirements. It should be remembered that in order to make housing more affordable, there needs to be more housing built in total. There should be a flexible approach to the delivery of any affordable housing requirement. It must be recognised that affordable housing requirements must not be so onerous that they threaten the delivery of the overall housing requirements. There are a number of concerns with the assumptions made in the AHVS. It does not properly factor in the cost of building to Code for Sustainable Homes level 4, even though it a requirement of Policy CC2 in the Local Plan, it does not adequately take account of the viability implications of other Local Plan policies and does not include sufficient residual land values to induce a sale. The supporting text to Policy AH1 (para’s 12.2-12.5) states that the AHVS work indicates that the various threshold targets are not unrealistic. However, in the current economic circumstances, particularly in lower value areas and on smaller sites, a more site-by-site assessment of the viability of schemes will be necessary. Recommended Change - an amendment is needed to ensure a sufficient level of flexibility within the dynamic target for each threshold to ensure that affordable housing is determined on a site by site basis. Also, in accordance with NPPF (para 50), the level should be set as a target and should be a starting point for negotiations in taking into account a site’s financial viability. Being able to adapt to changing market conditions is essential within Policy AH1.</p> <p>Support - Policy AH1 discusses the possibility of ‘open book’ assessments where the</p>	659/15083	Persimmon Homes

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	<p>policy requirements cannot be met. This is not objected to in principle.            Comment - Policy AH1 should be tested through the <i>Local Plan Area Wide Viability Study (June 2013)</i> for its cumulative impact on viability. Not aware this has been done and recommend it should be done prior to submission of the Local Plan to the Secretary of State.</p>		
<p><b>Policy AH1 Affordable Housing Continued</b></p>	<p>Objection – affordable housing targets set out in the plan for sites between 2-14 dwellings are unworkable and evidence for this is the lack of planning consents and completions of schemes of this size, in rural areas in York, which have been subject to affordable housing requirements since 2005. The proposed targets for brownfield and greenfield sites of 15 or more dwellings are also unworkable and the evidence for this is the record low completions and planning consents in York in the last 4 years. Further evidence that the affordable housing targets are unworkable in York on existing sites include the recent appeal decision in favour of the Grain Stores site, Water Lane, Clifton Moor (Appeal Ref: APP/C2741/A/11/2160459). The Inspector allowed the appeal and ruled that affordable housing provision should be based on zero provision as at the date of the permission (12<sup>th</sup> March 2013). The developer of the Hungate development said that the remaining phases of the scheme, amounting to c.558 dwellings will not proceed without the dropping of the affordable housing requirement from 20% to zero%.</p>	668/16808	
	<p>Objection – use of annual dynamic targets will create significant uncertainty to the development industry and make it difficult for the industry to assess viability of individual schemes.            Comment - whilst no objection to viability appraisals in special cases, this should not be used to justify unsustainable policies. It is incumbent upon the Council to ensure its policies are sustainable in the majority of cases by ensuring they will not unduly burden development. Should thoroughly test the cumulative impacts of all policies and obligations for their impact on viability. This should then be used to set an upper limit for its affordable housing requirement which could be deliverable in the first 5 years of the Plan and not threaten the viability of schemes under current economic conditions.</p>	673/16850	Taylor Wimpey UK Ltd
	<p>Objection – remove present low cost housing proportions for private builders.            Comment – the Council should develop responsibility for social housing either directly and / or housing associations.</p>	1054/17051	
	<p>Support – supportive of the need to have flexible approach to take account of changing market conditions            Comment – for off site financial contributions the use of a district wide average could</p>	1337/17290	Halifax Estates

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	inhibit sites coming forward and therefore the figure should be set on a site by site basis. Would be sensible to set a price per square metre of affordable housing development. This should be net of ancillary and communal areas.		
<b>Policy AH1 Affordable Housing Continued</b>	Support – generally supportive of the policy on affordable housing which aims to improve affordability across the housing market with the additional considerations being around the adoption of a peppercotting/random scattering of tenures/range of housing across sites. Alternative – should set affordable housing targets for the Plan period. If evidence comes forward to suggest there has been a change in circumstance, then the Policy can be reviewed at that time. Therefore, Option 3 should be adopted as the preferred approach.	1346/17309	Joseph Rowntree Housing Trust
	Support – agree with the policy and it should reflect house prices in different market areas, so that payment is linked to the area of the City where the home is built. Approach is appropriate and should be peppercotted as defined in the Plan and should look indistinguishable (or as near as possible) from the surrounding market housing. Support targets being amended annually based on local market conditions as set out in the preferred approach. Comment – for off site financial contributions support a price per square metre. Agree with the approach to exceptions sites (Policy GB4) but have concerns in relation to allowing some element of Market Housing in developing an exception site for affordable housing. The subsidy should be in the value of the land, which is an exception site, but by its very nature, should be low. This element of the policy is rejected as it could open the door for inappropriate development. It appears to be a significant change which benefits land owners and developers rather than the community.	1457/17412	
	Objection – use of annual dynamic targets will create significant uncertainty to the development industry and make it difficult for the industry to assess viability of individual schemes. Comment - whilst no objection to viability appraisals in special cases, this should not be used to justify unsustainable policies. It is incumbent upon the Council to ensure its policies are sustainable in the majority of cases by ensuring they will not unduly burden development. Should thoroughly test the cumulative impacts of all its policies and obligations for their impact on viability. This should then be used to set an upper limit for its affordable housing requirement which could be deliverable in the first 5 years of the Plan and not threaten the viability of schemes under current economic	1514/17481	Monks Cross North Consortium

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	conditions.		
<b>Policy AH1 Affordable Housing Continued</b>	<p>Objection – it is not clear on what basis the annual dynamic targets will be tested. Concerned that the AHVS (April 2010) and its Annex (February 2011) are not robust and do not provide a sound basis for the Plan. The cumulative cost implications of the standards and policies contained within the local plan have not been considered. These costs need to be taken into account as required by the NPPF (paras 173 &amp; 174). This will ensure a more accurate approach, as opposed to providing a strategic assumption of an £8,000 contribution per dwelling. The residual land values and the alternative use value benchmarks are too low, being only £200k per hectare for agricultural land. This value will not incentivise a landowner to sell. The study is based on 15 examples, which range in size from 10 to 235 dwellings, with the average size being 85 dwellings. However, the average size of the 17 Strategic Sites is 1,033 dwellings. The examples used are not reflective of the Strategic Sites and do not take into account the associated significant infrastructure costs. An average density of 40-45 dwellings per hectare has been used. However, some of the local plan sites have a lower density, for example 30dph at Clifton Gate. Build costs are higher for lower density schemes due to a larger area for external works and services. As such the additional costs should be considered. The Study assumes a nine month construction period, apart from one site which is 15 months. However, some of the Strategic Sites will be built out over a 15 year period. The longer build out period will have financial implications which should be considered. The report should be updated at the same time as the Local Plan Area Wide Viability Study in order to ensure that the Plan is based on a robust evidence base.</p> <p>Support- - support for Policy AH1 (iv).</p>	1523/17503	Commercial Estates Group, Hallam Land Management & T W Fields Ltd
	<p>Objection – the affordable housing demands are unreasonable and unworkable. The threshold of just 2 units is ridiculously low; it should be at least 10 dwellings. The idea of ‘open book’ negotiations to reduce the requirement is flawed. In practice it just does not work. Builders do not negotiate, they walk away. It’s not worth their while to throw resources at a futile exercise.</p>	1526/17518	Laverack Associates Architects
	<p>Objection –the preferred approach would fail to provide developers and landowners with sufficient certainty over the required levels.</p> <p>Alternative - it is recommended that the target affordable requirements are set over a fixed period of 3 to 5 years. Although additional guidance and clarity from the planning authority would be welcomed, this should be provided either within the plan or as part of the evidence base, in order that it may be given full consideration at the stage of</p>	1661/9952	Linden Homes

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	making the plan, appropriate to the preparation of a sound plan.		
<b>Policy AH1 Affordable Housing Continued</b>	<p>Objection – Evidence Base / Viability – concerned that an adequate viability assessment has not been undertaken which takes into account the full impact of all the policy requirements cumulatively. A number of key concerns regarding the financial burdens being placed on housebuilders without any evidence undertaken to conclude whether the policies and obligations being proposed in the Local Plan are achievable and to the extent where they would not preclude development from coming forward. Extremely concerned that the proposed policies collectively will stifle housing growth and will result in a Local Plan that does not significantly boost housing growth, nor comply with the NPPF.</p> <p>Objection - the policy is not based on credible evidence. The Affordable Housing Viability Study is out of date and does not take into account of all policy requirements, obligations and the viability implications of these. Object to the preferred approach of an 'annual dynamic target', which creates uncertainty for housebuilders and creates problems for developers to assess the viability of individual schemes. The plan does not set out a mechanism which York will adopt to amend these targets on an annual basis. If the Plan is to set annual dynamic targets, it is expected that the basic mechanism for carrying an annual review be referred to. Any target must be rigorously tested – not the case for targets prescribed in Table 12.1 of the Plan. To review such targets annually will require a large amount of work – concerned that the evidence base isn't comprehensive enough to substantiate how any new targets are arrived at. There will be no opportunity or examination to enable developers to challenge targets once the Local Plan has been adopted. The policy is not appropriate for development control purposes if decisions are being made based on out of date evidence – the requirement should be based on up to date evidence and not 'current' as the latter does not automatically mean it is up to date and reliable. The requirement to pepper pot affordable housing is difficult to achieve on flatted development and often presents problems regarding future management of such purposes.</p> <p>Comment – whilst the principle of the viability cushion at the end of the policy is welcomed, it should not be used to justify unreasonable and unfounded policy targets.</p> <p>Support - no objection to 'dynamic targets' (as opposed to 'annual dynamic targets') which are fixed for the lifetime of the Plan, subject to the targets being appropriate and tested thoroughly in terms of viability.</p>	1668/15020	Barratt & David Wilson Homes

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<b>Policy AH1 Affordable Housing Continued</b>	Objection – the Plan will in effect exacerbate an already large affordable housing issue. This approach is unsound. The use of dynamic targets will increase uncertainties for developers and make accurate viability assessments difficult. The evidence base needs updating to provide up-to-date viability evidence which supports the policy requirements set in Policy AH1. Should update the Affordable Housing Viability Study prior to submission of the Plan.	1705/9773	Gladman Developments
	Support – the intention to introduce flexibility to allow the provision of affordable housing to respond to market conditions is supported. Objection – concerned that approach may create a degree of uncertainty for developers as the targets will be frequently under review and may not provide the confidence to plan investment into sites in the medium-long term. Would suggest that the policy includes an upper percentage cap beyond which affordable housing requirements would not exceed.	1748/9847	Diocese of Middlesbrough
	Objection – whilst the evidence base for the Local Plan Preferred Options includes detailed analysis of the introduction of the Affordable Rent model, policy AH1 contains no reference or allowance for this type of tenure coming forward and there is currently a gap between the evidence base and policy wording. For local policy to require a high proportion of social rent units is clearly not aligned with the realities of the current and foreseeable market conditions or with national advice. It is considered that the proposed social rent tenure requirement is unviable and inappropriate and the 70% social rent should be amended to 70% affordable rent.	1785/9867	Jones Lang LaSalle (LaSalle UK Ventures Property)
	Objection – do not mix so called affordable homes with others as house building will stagnate.	1886/9903	
	Objection – object to proposal that expects housebuilders to build affordable houses at their own expense then give them away.	1935/161	
	Objection – affordability in rural areas is the best means of keeping village communities healthy, whilst policy AH1 is laudable, it will only be achieved as part of a national housing programme and one which is targeted not just in major cities, but also in sub regions.	2416/6657	
	Support – Needs to be more affordable houses in the City, so fully support new developments.	2547/6842	
	Objection – Allocations of affordable housing quotas for new developments not viable. Adds substantial premium to the cost of each market home – increased house purchase cost in turn puts purchasing new homes beyond reach of many whom we should be helping get on the housing ladder. Proposed ‘pepper-potting’ affordable	2789/7397	



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	homes and having them to same standard as adjacent purchased homes in unbelievably divisive.		
<b>Policy AH1 Affordable Housing Continued</b>	Comment – planning for circa 30% of new developments to consist of affordable housing, what impact will this bring in the socio economic groupings of the population, anti-social behaviour and safety and security of existing residents in the City?	2806/7450	
	Objection – do not agree with the preferred approach of having a single higher level target for the whole of the plan period than targets that are amended annually based on local market conditions) and do not think a bench mark land price for exceptions sites should be set. Comment - for off site financial contributions the formula should have a price per square metre.	2846/7551	
	Objection – there is little to suggest that these new developments will meet the need for affordable housing in York.	3064/7930	
	Objection – Affordable Housing Viability Assessment is flawed. House prices are not as high as stated for new builds and therefore the values are inflated skewing the whole process. Extraneous costs are too low and need to be reviewed. Where are archaeological costs, surveys for planning, arrangement fees and lawyer costs, overheads for a developer?	3066/7935	
	Objection – disagree with the statement that York needs more affordable housing – its all driven by population growth, increasing demand and prices. There has to be a limit.	3151/8116	
	Support – affordable housing must be provided as a very high priority.	3242/8307	
	Comment – not convinced there would be any affordable housing in any of the proposed sites and even if there was, by the time they were sold on, the properties would then be sold at the current market value.	3247/8341	
	Comment – there is a need for social housing, particularly for families which should be met by the Council to ensure those in need have secure tenancies at a fair rent. Brownfield sites to be utilised. We should not be encouraging private ownership.	3358/8610	
	Support – agree with the urgent need for affordable housing. In the Local Plan, Arup suggests a construction target of 25% affordable housing. Reality is that the Local Plan assumes the construction of the required 3950 affordable dwellings will not be completed in the first 5 years, but will be phased in over the period until 2030. Furthermore, in 2011, there were 1422 vacant houses in York of which 510 have been vacant for over 6 months. It is very unlikely that houses on the scale envisaged in the Local Plan will be built, resulting in an insufficient supply of affordable housing in a reasonable time frame, so a more short – medium term solution is required, including	3428/8770	

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	Government capital investment initiatives etc.		
<b>Policy AH1 Affordable Housing Continued</b>	Support – additional affordable housing in Dunnington – they could be a mixture of rented and shared equity, good for young families.	3689/9725	
	Comment – are companies who consider building in York able to afford to include a percentage of ‘affordable’ housing in their developments and what is the definition of ‘affordable’ housing?	3799/10241	
	Comment – are companies who consider building in York able to afford to include a percentage of ‘affordable’ housing in their developments and what is the definition of ‘affordable’ housing? Is it housing to rent, shared ownership or low cost purchase?	3842/10324	
	Comment – what proportion will be “affordable”? Will here be rented accommodation other than the often unaffordable private sector?	3902/10441	
	Objection – no to affordable homes, do not agree with principle of affordable homes.	3970/10572	
	Comment – affordable housing could be built on brownfield sites. Who will buy these properties in Huntington – foreign workers, student rentals or large families.	4063/11755	
	Objection – putting people on benefits next door to a family who have paid £300K+is a major error and only causes further significant problems, including social issues, devalued houses etc.	4110/10811	
	Comment - need to push the Government to build more affordable housing instead of building more and more camps for people living in caravans. It should also open up the 20,000 plus houses boarded up and left to rot.	4290/11129	
	Objection – the threshold of just two units is ridiculously low - it should be at least 10 dwellings. The affordable housing demands are unreasonable and unworkable.	4362/11309	
	Objection – need to make it more viable for developers to use the many brownfield sites available by reducing requirements for affordable housing.	4822/14215	
	Support – agree with the policy and it should reflect house prices in different market areas, so that payment is linked to the area of the City where the home is built on. Approach is appropriate and should be pepperpotted as defined in the Plan and should look indistinguishable (or as near as possible) from the surrounding market housing. Support targets being amended annually based on local market conditions as set out in the preferred approach. Comment – for off site financial contributions support a price per square metre. Agree with the approach to exceptions sites (Policy GB4) but have concerns in relation to allowing some element of Market Housing in developing an exception site for affordable housing. The subsidy should be in the value of the land, which is an exception site, but by its very nature, should be low. This element of the policy is	5178/12354	

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	rejected as it could open the door for inappropriate development. It appears to be a significant change which benefits land owners and developers rather than the community.		
<b>Policy AH1 Affordable Housing Continued</b>	Comment – not clear on what basis annual dynamic targets will be tested. No objection to reviewing affordable housing target provided that it is properly done as part of the plan-making process; is based on robust evidence provided within an up-to-date Strategic Housing Market Assessment and Viability Appraisal; and is subject to public scrutiny. Request that the plan sets a clear affordable housing target in the first place to ensure that it is consistent with the NPPF and hence is sound.	5245/14340	Hogg Builders (York) Ltd
	Comment – one of problems with current housing market is that young people aspiring to own their own home have to pay a very large premium on price they pay for a new house so developer can provide affordable housing. Increased cost of new housing obviously pushes up prices of existing properties in area meaning first time buyers are left unable to purchase their own property. Other ways to fund social housing should be found that don't distort the private housing market.	5274/14377	
	Comment - will the affordable housing really be affordable or will it be social via private landlords? Concerned that those who have bought on the open market will be surrounded by affordable houses.	5302/14457	
	Comment – should build new homes for rental, which would reduce the private rental market, reducing the housing demand and probably reduce house prices.	5338/14522	
	Objection – oppose the level of social housing demands of developers which is killing regeneration of the Terry's Site on Bishopthorpe Road.	5434/14761	
	Comment – believe the approach to affordable housing makes dreams of owning a high quality affordable near workplaces a reality. Consider that it's better for City of York to have affordable housing targets that are amended annually based on local market conditions.	5493/14862	
	Comment – affordable housing is needed but the demand for 2, 3 & 4 bedroom homes set out in the Plan do not seem to take account of the impact of recent Welfare Reforms, including the so-called 'Bedroom Tax', which has fuelled strong demand for 1 bed homes.	5599/13138	
	Comment – it is unclear how the new population will be able to afford to purchase or rent the new builds. Making them 'affordable' is not a solution if 'affordable' is still above the means of those concerned or uneconomic for the developer.	5622/13225	
	Comment – affordable homes are not available to a large percentage of first time buyers.	5684/13393	

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<b>Policy AH1 Affordable Housing Continued</b>	Comment – there seems to be a demand for affordable housing but this does not seem to be a priority at all in the Plan.	5717/13471	
	Comment – to provide affordable housing in the City should be considering modernising the older properties or demolishing them and replacing with more suitable housing.	5738/13518	
	Comment – affordable housing proposals will continue to limit development, drive up prices of other houses and drive up density levels. Can there not be targeted developments of groups of units tendered and built without subsidy from other houses?	5740/13532	
	Comment – should be building more affordable houses for young people on brownfield sites available.	5753/13584	
	Comment – rural communities need some form of lower cost housing to make it possible for rural workers to remain in the villages with the farms and local businesses and also to maintain schools and young people in them.	6047/15481	
	Comment – Dunnington lacks affordable housing for first time buyers.	6313/15962	
	Comment – it is unclear whether the proposed 5 yearly reviews of the Affordable Housing Viability Assessment will be reflected in S106 Agreements relating to the larger allocated sites which will be developed over a period longer than 5 years.	6339/16010	The Merchant Taylors Of York & R & M Gorwood
		6341/16016	
		6344/16026	Escrick Park Estate
	Objection – significant concerns regarding the assumptions made in the AHVS, and do not consider it a sound basis for the Plan. The AHVS does not properly factor in the cost of Building to Code for Sustainable Homes 4, even though this was a requirement of the previous Core Strategy and remains a requirement in Policy CC2 of the Local Plan. It does not adequately take account of the viability implications of other plan policies and obligations and it does not include sufficient residual land values to induce a sale – NPPF para 173 is clear that the costs of development must have regard to providing competitive returns to a willing landowner. It should also be noted that the AHVS is already out of date and would need to be updated prior to submission of the Local Plan. The use of annual dynamic targets will create significant uncertainty to the development industry and make it difficult for the industry to assess the viability of individual schemes. The policy discusses ‘open book’ assessments where the policy requirements cannot be met. Whilst there is no objection to viability appraisals in special cases, this should not be used to justify unsustainable policies. Should ensure policies are sustainable in the majority of cases and thoroughly test the cumulative impacts of all policies and obligations for their impact on viability. This should then be	6351/17636	Gladedale Estates

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	used to set an upper limit for its affordable housing requirement which could be deliverable in the first five years of the Plan and not threaten the viability of schemes under current economic conditions.		
<b>Policy AH1 Affordable Housing Continued</b>	Comment – there has to be recognition that market housing attracts money and high value jobs and a higher proportion should be permitted if the development plans for the city are to be realised. This would result in better returns from S106 monies which should fall to the relevant neighbourhood first to ensure essential works, drainage etc are completed to necessary standards.	6363/17702	
	Comment – it is unclear whether the proposed 5 yearly reviews of the Affordable Housing Viability Assessment will be reflected in S106 Agreements relating to the larger allocated sites which will be developed over a period longer than 5 years.	6383/16117	Joseph Rowntree Housing Trust
		6384/16123	Taylor Wimpey UK Ltd & Linden Homes
	<p>Objection – ‘pepper-potting’ is a divisive and unsuccessful policy and does not enhance social harmony. The removal of the priority of developing brownfield sites before greenfield sites is designed to get large scale developers to finance the provision of 240 affordable homes each year, but this aspiration is not a credible one. The allocation of high affordable housing quotas is not commercially viable. When the costs of such quotas are added to other Section 106 costs and community infrastructure costs, it adds a substantial premium to the cost of each market home, often putting the purchase price outside the reach of many people. The main focus for Affordable Housing growth in the lifetime of the plan should come from the direct building from the Council and Housing Associations.</p> <p>Support – agree that targets should be amended annually.</p> <p>Comment - Financial contributions from developers should be based on market conditions. There should be general, flexible guidelines in relation to exceptions sites. Small developments (however defined) don’t necessarily need to provide affordable housing on or off site and there should be general, flexible guidelines.</p>	6508/17671	City Of York Council Conservative Group
Objection – the allocations of affordable housing quotas for new developments are not viable. When costs of such quotas are added to other S106 cost and community infrastructure contribution costs, it adds a substantial premium to the cost of each market home, putting purchasing a new home beyond the reach of many. Demand for affordable housing has increased, from those who would otherwise have been able to purchase their own home. Pepper-potting affordable homes and having them to the same standard as adjacent purchased homes is unbelievably divisive – social harmony is not enhanced by having social homes at social rents next door to identical homes	6510/16286	Cllr Joseph D Watt	

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<b>Policy, Site, Table, Figure, Para etc.</b>	<b>Comments</b>	<b>Ref.</b>	<b>Name (where business or organisation)</b>
	purchased on the open market.		
<b>Policy AH1 Affordable Housing Continued</b>	<p>Comment – the Policy has responded to changed market conditions and is flexible enough to continue to take account of future change.</p> <p>Objection - not convinced that the levels of housing need quoted in the Plan have been adequately justified. Second York and North Yorkshire Housing Needs Survey reduced the numbers significantly. Student numbers in the City skews forward projections as not all those who remain in York after they have finished studying move into single person households. Although the number of foreign students is increasing, the majority return home after their studies are complete. If the overall level of housing requirements, based on the projections above, is reducing then the percentage of affordable needs must also reduce.</p>	6516/16332	City Of York Council Liberal Democrat Group
	<p>Objection – do not believe the quoted need figure of 790 affordable homes per year has been properly evidenced against a changing economic situation. Whilst it is acknowledged that there is a backlog in supply, a more realistic figure would be 200-300 homes per year which could reasonably be met by a combination of Housing Developments and Local Authorities own programme of house building using government funding streams such as the New Homes Bonus. The solution to the issue are many and varied, including maximising the number of new social housing units provided including the erection of more Council houses, buying homes to increase the social rented pool, on the open market. This would include buying up complete developments and letting them at either market or 80% rental prices and adopting a more flexible approach to S106 requirements. This might, for example, mean accepting into a social rented pool, subjected to safeguards, homes ‘part exchanged’ by private buyers for new homes on commercial developments. Do not believe the attempt to flood the market with cheap land, by agreeing to release more green fields for potential development would make a contribution to solving the underlying affordability problems.</p>	6517/16357	York Central Liberal Democrats
	<p>Support – agree with most of the Policy, strongly support the requirement for an open book appraisal if the applicant claims to be unable to meet the dynamic targets.</p> <p>Objection – the Policy should make reference to possible 100% affordable sites as mentioned in paragraph 12.13.</p>	6518/16401	York Green Party
	<p>Objection - the Preferred Options approach isn’t appropriate. The removal of the priority of developing brownfield sites before greenfield sites is designed to get large scale developers to finance the provision of 240 affordable homes each year. Recent history in York regarding developer’s lack of interest in building affordable homes as a</p>	6519/16476	Cllr Jenny Brooks

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**Section 12: Affordable Housing Continued**

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<b>Policy, Site, Table, Figure, Para etc.</b>	<b>Comments</b>	<b>Ref.</b>	<b>Name (where business or organisation)</b>
	significant element of their new built estates does not make this aspiration a creditable one. The allocations of high affordable housing quotas are also commercially non-viable. The main focus of affordable housing growth in the lifetime of the plan should come from direct building from the Council and Housing Associations.		
<b>Paragraph 12.02 &amp; 12.03</b>	Objection – Evidence Base – AHVS – strongly suggest the Study is out of date, with much of the underpinning evidence drawn from 2009 data. Moreover, it was prepared in a previous planning policy context prior to the NPPF being published. In particular, it is noted that the AHVS does not properly factor in the cost of building to Code for Sustainable Homes 4, even though it remains a requirement in Policy CC2 of the Local Plan. The AHVS does not adequately take account of the viability implications of other Local Plan policies and obligations and does not consider the implications of the Community Infrastructure Levy (CIL) on viability alongside affordable housing. The AHVS does not include sufficient residual land values to induce a sale. The approach uses alternative use value (AUV) plus a notional ‘hope’ value, which is not supported by the current best practice guidance prepared by the RICS. Halifax Estates wishes to draw the attention to paragraph 173 of the NPPF which states that the costs of development must have regard to providing competitive returns to a willing landowner. Comment - Evidence Base – AHVS – it is also noted that subsequently produced a Local Plan Area Wide Viability Study. However, the Study has not fully tested all of the Local Plan policies and obligations for their cumulative impact upon viability. Indeed, it is highlighted within the Study itself that will be required to undertake further viability assessment in order to test the full Local Plan policies.	1337/17289	Halifax Estates
<b>Table 12.1 Dynamic Targets Based On Market Conditions April 2012</b>	Objection - whilst supportive of the need to have a flexible approach to take account of changing market conditions, table 12.1 contradicts this with setting a “dynamic target” of 30% for greenfield sites greater or equal to 15 dwellings. Note that paragraph 12.5 suggests the possibility of ‘open-book’ assessments where the policy requirements cannot be met. Whilst no objection to such assessments in special cases, this should not be used as a mechanism to bypass unsustainable policies on a regular basis. Such an approach is likely to significantly delay delivery of proposed development, including affordable housing, which will have a detrimental effect on both the delivery of the Local Plan and the policy objectives of meeting affordable housing needs. Recommend that undertake a comprehensive assessment of the cumulative impact of all of proposed Local Plan policies upon development viability. In the context of Table 12.1 and to reflect the need for a flexible approach to affordable housing it is recommended that the dynamic target for greenfield sites is amended to “up to 30%”.	1337/17291	Halifax Estates





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<b>Policy, Site, Table, Figure, Para etc.</b>	<b>Comments</b>	<b>Ref.</b>	<b>Name (where business or organisation)</b>
<b>Question 12.01</b>	Comment – it is an appropriate approach and should be pepper-potted as defined in the Plan and should look indistinguishable (or as near as possible) from the surrounding market housing.	59/12655	Dunnington Parish Council
	Objection – significant concerns regarding the assumptions made in the AHVS, and do not consider it a sound basis for the Plan. The AHVS does not properly factor in the cost of Building to Code for Sustainable Homes 4, even though this was a requirement of the previous Core Strategy and remains a requirement in Policy CC2 of the Local Plan. The AHVS does not adequately take account of the viability implications of other plan policies and obligations and does not include sufficient residual land values to induce a sale – NPPF para 173 is clear that the costs of development must have regard to providing competitive returns to a willing landowner. It should also be noted that the AHVS is already out of date and would need to be updated prior to submission of the Local Plan.	145/13869	Home Builders Federation
	Support - the Preferred approach to affordable housing should be undertaken.	943/16956	
	Support - agree with the preferred approach.	1109/17197	
	Support - the preferred approach to affordable housing delivery is acceptable.	1736/9824	Oakgate Group PLC
<b>Question 12.02</b>	Support – agrees that targets should be amended annually based on local market conditions.	59/12656	Dunnington Parish Council
	Objection - do not agree with a notion of a single high level target. The affordable housing target must be based on the viability of development at the time of grant of planning permission.	187/13921	York & North Yorkshire Chamber of Commerce
	Comment - there needs to be flexibility with regard to targets in the light of prevailing local conditions.	943/16957	
	Support - targets should be amended annually.	1109/17198	
	Objection – believe the plan should set out a clear framework that provides certainty in order to aid delivery. It is inappropriate to review the affordable housing targets on an annual basis because it will cause confusion and lead to delays in the submission and determination of planning applications. It may lead to a situation where developers may apply to vary the amount of affordable housing if the targets were to be reduced before permission had been implemented. If evidence comes forward to suggest there has been a change in circumstance, then the Policy can be reviewed at that time. Therefore, Option 3 should be adopted as the preferred approach or provide local level policy with overall affordable housing targets for the duration of the plan.	1346/17310	Joseph Rowntree Housing Trust

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<b>Policy, Site, Table, Figure, Para etc.</b>	<b>Comments</b>	<b>Ref.</b>	<b>Name (where business or organisation)</b>
<b>Question 12.02 Continued</b>	Support - do not think it would be better to have a single higher level target across the whole plan period. The preferred approach being advocated responds well to market forces and is dynamic. It also has the potential to save considerable time and expense that would otherwise have to be expended on the provision of open book appraisals.	1736/9825	Oakgate Group PLC
	Support - targets should be amended annually.	6519/16477	Cllr Jenny Brooks
<b>Question 12.03</b>	Comment – support a price per square metre.	59/12657	Dunnington Parish Council
	Comment - it is recommended that the figure should be set locally and based on individual site characteristics and expected sales values. The use of a district wide average will inhibit the delivery of sites coming forward within the lower value market areas due to issues of viability.	145/13871	Home Builders Federation
	Objection - do not agree with either option (set price per property or price per square metre). Off site financial contributions are usually used on smaller schemes. Small schemes are disproportionately affected by the requirement to provide affordable housing. The price / requirement for affordable housing should therefore be based on the viability of development at the time of grant of planning permission.	187/13922	York & North Yorkshire Chamber of Commerce
	Comment - the price should be based on the property.	943/16958	
	Comment – should set a price per property and it should be linked to the area.	1109/17199	
	Comment - for off site financial contributions, the approach should be kept simple so that potential applicants and developers can easily identify what contribution will have to be made. Convoluted formulas should be avoided if possible. The use of a set price per square metre would offer a fairer approach. The average house price should be linked to different market areas again in order to deliver a fairer approach. In all cases the Council should provide detailed confirmation of these figures as part of the annual review of the targets and thresholds approach.	1736/9826	Oakgate Group PLC
	Comment - financial contributions from developers should be based on market conditions.	6519/16478	Cllr Jenny Brooks
<b>Question 12.04</b>	Comment - have concerns in relation to allowing some element of market housing in developing an exception site for affordable housing. It appears to be a significant change which benefits landowners and developers rather than the community.	59/12658	Dunnington Parish Council
	Comment - there should be exceptions only where valid evidence is presented.	1109/17200	
<b>Question 12.04 &amp; 12.05</b>	Comment - there should be general, flexible guidelines for exceptions sites.	6519/16479	Cllr Jenny Brooks

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<b>Policy, Site, Table, Figure, Para etc.</b>	<b>Comments</b>	<b>Ref.</b>	<b>Name (where business or organisation)</b>
<b>Question 12.05</b>	Comment - have concerns in relation to allowing some element of market housing in developing an exception site for affordable housing. It appears to be a significant change which benefits landowners and developers rather than the community.	59/12659	Dunnington Parish Council
	Comment - as houses are built, people move onwards and improves supply and demand ensures more houses become affordable.	1109/17201	