City of York Council New Local plan Examination November/December 2019		
Topic	**Questions**	**Supplementary Comments from York Labour Party & the City of York Council Labour Group**
Matter 1 **Duty to Cooperate**		
1.1 What are the strategic cross boundary issues of relevance / how addressed		There are several closely related issues around housing, employment, transport and sustainability which we consider the draft Plan completely fails on, and which we cover in greater detail elsewhere. The root cause is the insufficient local, and especially affordable, housing supply in York, which is negatively impacting on the labour supply for low and many middle income jobs in the city, both negatively impacting the local economy and leading to major long distance commuting into the city including from beyond the immediately adjacent authorities that also have high house prices and rents. The city is also a hotspot housing location for relocation from London and the south east, and also senior executives and professionals for West Yorkshire and the North East, so serves a wider housing function than simply supplying the York/Selby area. The associated travel patterns also have wider area as well as local transport and sustainability implications. These cross-boundary issues are not adequately covered either in the plan or in fulfilling a duty to cooperate with York's immediate neighbouring Local Planning Authorities only.
Matter 2 **Housing strategy/ OAN/Requirement**		
Housing Market Area		

The Objectively Assessed Need (OAN)		
2.2 Council revision to SS1 from 867-790	a) Robustness of GL Hearn revisions	York LP has consistently argued that the Local Plan should be looked at in the round. In particular that the plans for the economy, housing and transport need to be considered together. As a result, the fact that the plan is being considered in stages makes arguments for sustainable and robust policies harder to argue and less coherent. We stated in April 2018 and May 2019 that the evidence base for the overall assessment of housing need and the housing requirement were not being approached in a robust and sound way. The Council has argued throughout the Local plan process for the lowest figures it could find to support. So it ignored the advice of its own officers and consultants in January 2018 (i) and of the government itself (ii) in November 2018. Although a low spending Council it commissioned additional and expensive work from its consultants in order to try and justify lower figures of housing provision. However this apparent enthusiasm for up to date information and analysis did not extend to the economy and transport. In our previous submissions we have argued for the Economic Strategy 2016 and the Transport Strategy 2013 to be updated. Neither of these have occurred or indeed been started, despite the former being a top priority of the new administration in June 2019. The Council justified the use of the new housing assumptions on the basis of a short-term arrangement. As the Local Plan is long term and cannot be reviewed for 5 years this is a disingenuous statement.

2.3 What approach has been used to reach OAHN does it follow advice and	a) Use of 2016 OAHN justifications	It is not adequately justified – for the reasons touched on above and covered in more detail below and in our previous submissions.
	b) have market signals been taken into account	A major impediment to the jobs and employment growth is the affordability crisis in housing. York has been identified as the 9th most expensive city in England for a 3-bed family home (ref). The median house price is almost 10 times median incomes the highest of any city in the North of England. Despite the policies of the last two administrations this situation has not changed. House prices in York in the last 5 years have gone up 24% compared to a regional average of 16% and makes York comfortably the most unaffordable city in the North at around 9 times income. The Council is arguing that the number of homes provided each year should be 790.The market evidence demonstrates clearly that this is insufficient for three reasons. First the average production of homes over the last 5 years is exactly 870 homes. Second this level has been insufficient to slow down or begin to reverse the affordability problem in the city and third it does nothing to meet the needs of the poorly paid or low income households through social and affordable properties. York has the fifth lowest level of weekly wage jobs in British cities and had the fastest falling wages between 2017 and 2018 of any British city (Centre for Cities 2019).
	c) have employment trends been taken into account	No – the increasing shortage of office and small business accommodation as existing employment premises are lost to housing because of its much higher value is causing increasing difficulty for local employers who are finding themselves asked to leave, for start-ups and expanding businesses, and also in terms of loss of potential relocations to the city. This trend is continuing as the latest 2018-9 housing monitor shows:

		Housing Completions – Summary *Between 1st April 2018 and 31st March 2019 there were a total of 449 net housing completions:* · *28 homes (6.2%) resulted from 'prior approval' i.e. sites benefitting from relaxed permitted development rights to allow conversion to residential use,* · *Changes of use of existing buildings to residential use and conversions to existing residential properties accounted for 155 (34.5%) of all completions, and* *Housing Consents – Summary* · *40 net new homes (2.5%) were permitted through 'prior approval' as a result of relaxed permitted development rights.* A further major office loss (Northern House) was only announced last week – see https://www.yorkpress.co.uk/news/18051798.york-offices-demolished-make-way-new-flats/. Office to hotel conversions are also playing a part in this problem, shifting York's job offer down market. We support the employment figures in terms of securing a sustainable and balanced local economy, and addressing low pay. The housing figure needs increasing and the balance of the type of provision with much more affordable accommodations needs to addressed.
	d) Does OANH provide enough	No – the extreme shortage of affordable homes is deterring some employers from locating in York as their employees, particularly when starting families, are forced to secure accommodation elsewhere. In addition, as stated above, office accommodation is being lost at an increasing rate because of the conversion or redevelopment of

	homes to cater for new jobs	employment space which is being replaced by either housing or hotels/leisure provision, and the overwhelmingly top end new housing supply does not match the expanding low paid economy employees needs. Also, because much of the new housing is going to relatively wealthy in movers it is not releasing existing properties to a sufficient degree lower down for the local demand.
	e) is methodology robust overall	No. For the reasons stated above – it focuses on the simple overall figures and doesn't address the local housing market structural issues.
	f) Does figure take account of all needs especially affordable and delivery failure	No - although the Local Plan figures assume 20% affordable provision no site of this type in York has achieved over 10% and the average affordable provision on brownfield sites in recent years is 4%. In the last 5 years the city has only achieved 11% affordable across all sites. In addition there has been an absolute net loss of 41 social rented homes during that period. The plan makes no serious attempt to address this problem. We have raised questions throughout this exercise about the scale and form of the York Central site. A key part of our concerns was that the site carried too great a share of the delivery of both housing and employment strategies. We argued in both 2018 and 2019 that the level of employment space at 86,000 sq. m. was inadequate and that the level of housing provision was too high at 2500 homes. Further we argued that the level of affordable homes at 20% was unachievable. The scale of housing and affordable provision on this site has been increased by 600% since the draft 2014 plan. The Executive Director of CYC informed the planning committee that the site would not meet priority needs. The Council subsequently granted planning permission to the York Central Partnership in April 2019 without any serious amendment to these figures or explanation where the shortfall would be made up. It

		is clear from the figures above even if the site went ahead it will make a minimal contribution to social and affordable rent. One of the main reasons that this supplementary submission is necessary is that the development of this site has become even more precarious. The main arguments which led to the Council giving planning permission after a truncated process was that if there was a delay in approval the Housing Infrastructure Funds amounting to £77m might be put at risk. In fact these funds have not been forthcoming and the site is at even greater risk of delay or failure. Homes England have been unequivocal that the £77m is dependent on 2500 homes being provided. The CYC Local Plan has failed totally to risk assess this situation, nor was proper consideration given to alternative plan approaches which placed less dependence on York Central site. In order to ensure that the Local Plan is robust and sustainable the dependence on this site must be reduced and a more sustainable scale and form of development must be adopted. The shortfall this will create must be made up by the restoration of sites such as arbitrarily removed from the plan or reduced in size to an unsustainable level.
2.4 SS1 states 650 jobs annually. Does OAHN or the housing requirement set out cater for this level of economic growth? How do		No – for the reasons we have touched on above, and in previous submissions.

figures fit together?		
The Housing Strategy: The Housing Requirement		
2.5 SS1 states that *867 is minimum*	a) is 867 an average or a minimum – is it a net figure	As addressed elsewhere.
	b) what period of time is intended	Addressed elsewhere.
	c)is plan period same as development plan? Why do policies endure beyond the plan period	
	d) Why is housing requirement higher than OAHN	Addressed elsewhere

	e) Does the housing requirement mean that green belt policies are flawed	Yes and addressed elsewhere
2.6 Will housing requirement show that the need for affordable housing has been met		No - as addressed elsewhere
2.7 Is the housing requirement set out in the plan underpinned by robust evidence and is the plan sound in this regard		No - as addressed elsewhere.