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29 November 2019

Dear Ms Crookes

This submission is made on behalf of the York and North Yorkshire Chamber of Commerce on the Inspectors Schedule of Matters, Issues and Questions for the Examination Draft York Local Plan. The Chamber has made representations at all recent stages of the Local Plan preparation – most recently on the 22 July 2019 the Plan proposed modifications consultation 2019 and 2018 Publication draft. We will be relying heavily on our previous representations when we join the debate at the Examination hearings.

The York and North Yorkshire Chamber is part of the West and North Yorkshire Chamber of Commerce. This Chamber, whose members represent businesses of all sizes and from all sectors, and employ ¼ of the population of West and North Yorkshire, has a strong desire to see York succeed and sees the adoption of a Local Plan as a key pre-requisite. So, we have a strong desire for the City succeed and see the adoption of a Local Plan as a key pre-requisite. In supporting York's economic growth we are concerned that the current plan as drafted is unsound instead we would want to see a better more ambitious Local Plan than the current City of York Council submission.

**Matter 2 – The housing strategy: the objectively assessed need for housing, the housing requirement and the spatial distribution of housing
The Housing Market Area (HMA)**

The Housing Market Area has been set as York and Selby by the Council. However, the reality is that all the areas surrounding York notably to the East and North act as York's economic hinterland with many people living there and commuting to York for work, retail, leisure and to use York station. There has been significant growth in housing in the towns and villages of East Riding (e.g. Stamford Bridge, Pocklington), Hambleton (including Thirsk) and Malton in Ryedale prompted by people buying and renting there due to the lack of housing in York. This expansion is putting pressure on transport links particularly due to the poor rail connectivity to the east of York. The proposed reduction in York's housing numbers will exacerbate this pressure as other areas take in the slack due to York's under delivery.

2.2 b) Does the 13,152 total housing figure identified at the year '2032/33' in the SHLAA Figure 6: Detailed Housing Trajectory Updated (790dpa OAHN) [EX/CYC/16] include meeting housing need arising in parts of adjoining districts (e.g. Hambleton, Harrogate, East Riding, Ryedale and Selby) which fall within the York Housing Market Area, as set out in the City of York Strategic Housing Market Assessment 2016 [SD051]?

No, we believe that the contrary situation effectively exists that these areas are making up York's shortfalls.

We reiterate our strong objection to the Council's reduced OAN of 790 and believe there are material flaws in the methodology used. The true figure of York's housing needs is much higher. We are aware others have made representations evidencing OAHN should be 1300 (Lichfield July 2019) and we would not disagree with their analysis as we believe York's housing crisis demands significant response. In our previous submissions we have set out why we believe 1070 is the minimum OAHN that should be used in York's Local Plan and we stand by our previous representations.

The Chamber is strongly supportive of York Central as key strategic site to help deliver much needed office space and housing in a prime location. However, there are major hurdles to overcome notably funding before the site can be delivered. We appreciate the assessment of site deliverability will be assessed later in the local plan examination but wish to highlight the huge reliance City of York are placing on this site in delivering its housing numbers. If the site isn't delivered the draft plan does not have the flexibility through safeguarded land to offset the lost numbers. Thus, we believe this further reinforces the need for setting the green belt boundaries to allow for safeguarded land.

A key concern for Chamber members is the difficulty faced in recruiting employees. The job market in York is tight with high levels of employment. Attracting people to come to work in a great place like York should be easier. However prospective employees quickly come to realise that they will struggle to find somewhere affordable to live, and if they plan to commute the overloaded transport infrastructure and congested roads are a deterrent to working in York. The market signals through York's house prices are a strong clue that more housing is required to help address the imbalance in supply and demand. Lack of access and/or loss of talent to Leeds is frequently cited in our conversations with business in York.

2.6 Will the housing requirement ensure that the need for affordable housing will be met?

We don't believe that the Plan will deliver the affordable housing that York requires to ensure our current and future population has the homes they need. York needs more housing of all types and tenures from affordable to family homes to retirement property to help downsizers free up under occupied houses. The policy is that 20% of new homes are affordable 30% on greenfield. This at a minimum would suggest York should deliver 158 (20% of 790). The level of delivery in recent years is set out below and shows that York has significantly under delivered in every year apart from 2011 Affordable housing completions

Year	Social rent units	Low cost home ownership units	Intermediate rent units	Affordable Rent units	Total affordable completions
2007/08	18	33	0	0	51
2008/09	116	35	0	0	151
2009/10	92	60	0	0	152
2010/11	153	55	74	0	282
2011/12	77	44	30	0	151
2012/13	62	48	17	0	127
2013/14	23	22	0	5	50
2014/15	63	25	3	48	139
2015/16	77	32	0	0	109
2016/17	53	16	21	0	90
2017/18	61	13	0	0	74
2018/19	36	24	0	0	60

Source <https://www.york.gov.uk/AffordableHousingCompletions>

MATTER 3 – GREEN BELT: PRINCIPLES, THE APPROACH TO DEFINING THE GREEN BELT BOUNDARIES, EXCEPTIONAL CIRCUMSTANCES AND THE APPROACH TO IDENTIFYING LAND TO BE ‘RELEASED’ FROM THE GREEN BELT FOR DEVELOPMENT

We will be substantively relying on our previous representations on the Green belt however our overall concern is that not enough land has been left out of the green belt boundaries to meet future housing and employment needs and in this respect, we make a number of points below.

Another key concern of local business is the lack of employment land allocated and whilst we appreciate this is a topic for a future stage of the Examination, we feel it needs highlighting now as:

- 1) the shortage of housing sites is leading to more pressure to convert offices into apartments using Permitted Development rights further reducing office supply
- 2) the green belt boundaries are being addressed in this hearing so we are keen to ensure that account is taken of the need to ensure York has a sufficient supply of potential development sites to meet future demand for employment through safeguarded land.

The conversion of offices under Permitted Development rights relates to older offices that had become functionally and economically obsolete; it does not reflect a lack of demand for employment land of the right type and quality in the locations that businesses want. York Central if and when it comes on stream will help but as we have mentioned there are concerns about its deliverability and it is likely to be many years before it makes a big difference to supply. In the meantime, the continued growth of the city and generation of employment requires the supply of a range of types employment land and spaces.

3.3 Will the proposed Green Belt boundaries need to be altered at the end of the Plan period? To this end, are the boundaries clearly defined, using physical features that are readily recognisable and likely to be permanent? What approach has the Council taken in this regard?

We are concerned that due to the lack of supply of Employment and Housing land the Green Belt boundaries will come under pressure to be altered before the end of the Plan period.

York has one of the lowest vacancy rates for commercial premises of any City in the UK. This makes it difficult for new businesses to start and existing ones to grow. We hear examples of entrepreneurs forced to move their business out of York because they can't find the space they need in York. This is harming York's economy and growth, particularly efforts to diversify from the lower wage jobs typically found in the retail and leisure sectors.

3.4 Should the Plan identify areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period?

Yes. We believe the draft Plan is unsound and needs new policies for Safeguarded Land to be introduced and consultation on the inclusion of more sites in site allocations to meet higher housing need numbers.

Regards,



Steve Secker
Chair, York & North Yorkshire Chamber Property Forum