

**CITY OF YORK LOCAL
PLAN EXAMINATION
STATEMENT OF CASE**

**MATTER 2: AFFORDABLE
HOUSING**

November 2019
On behalf of Karbon Homes

Carter Jonas

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1.0 INTRODUCTION

- 1.01. The following hearing statement of case is made for and on behalf of Karbon Homes (KH) and responds to selected affordable housing issues within Matter 2. In particular, this statement covers to MIQs 2.3f and 2.6.
- 1.02. The Inspector's MIQ numbering is included in bold for ease of reference.
- 1.03. The following responses are pursuant to and should be read in conjunction with our comments upon the Proposed Modifications, dated June 2019. Carter Jonas on behalf of Karbon Homes is scheduled to attend and participate in the examination hearing session for Matter 2.

2.0 MATTERS, ISSUES & QUESTIONS RESPONSES

2.01 We focus our responses in this hearing statement on the affordable housing aspects of the MIQs. The wider comments of KH in respect of the proposed main modifications are set out within the July 2019 representations and Housing Needs and Supply Report at Appendices 1 and 2 for ease of reference.

MIQ 2.3f

2.02 MIQ 2.3f asks if the revised OAN figure of 790dpa takes account of all housing needs, including affordable housing.

2.03 The plan assessment of need for affordable housing is based upon the 2016 SHMA and has not been reassessed in the subsequent September 2017 update or the January 2019 Housing Need Update (EX-CYC-9). As such, the indication of 573 affordable dwellings per annum is retained. This represents a high percentage of the council's OAN and housing requirement.

2.04 Appendix 3 is a September 2019 article from The Press which highlights the city-wide problem of affordability, stating:

"No area of York is affordable for first-time home buyers, a new study has revealed. The Post Office Money study found that York is a coldspot for first-time buyers - with no areas across the city deemed affordable for people taking their first step on the property ladder."

2.05 We note that Policy PM3 includes the statement that "in addition the plan will optimise the delivery of affordable housing to meet identified need subject to not compromising viability of development sites; and address the needs of specific groups". The Carter Jonas Housing Needs and Supply Report at Appendix 2 has identified that York has a severe shortfall in the delivery of new affordable housing in recent years and this is illustrated by the delivery figures since 2015-16, set against Right to Buy losses to affordable housing stock:

	2015-16	2016-17	2017-18	Total
New-build	100	135	67	358
RtB Sales	68	79	72	219
Nett delivery	32	56	-5	83

2.06 The statistics are taken from MHCLG Live Table 1011C: Additional Affordable Housing Supply; detailed breakdown by Local Authority, Completions 1, 2 and Table 685: Annual Right to Buy Sales: Sales by Local Authority: 1979-80 to 2017-18. The delivery of new affordable housing for York fell to only 56 units in 2018-19.

2.07 Looking further at Table 685 we can also draw a comparison with the surrounding districts where 'Right-to-buy' sales have remained reasonably low and collectively, between 7 districts, at around 50 homes a year. This trend suggests that there is an attraction within York for people to acquire council or other social housing. This pull is reflective of people's desire to live in the city.

2.08 Comparative RtB losses to affordable housing stock for York UA and N Yorkshire authorities since 2010 are as follows:

	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	Total
York UA	10	6	24	53	52	68	79	72	364
Craven	
Hambleton	
Harrogate	5	1	10	13	17	12	26	24	108
Richmondshire	2	1	5	7	9	7	8	11	50
Ryedale	
Scarborough	
Selby	3	3	10	16	25	13	22	21	113
N Yorkshire (total)	10	5	25	36	51	32	56	56	271

2.09 The Council's current policy approach to affordable housing delivery will see, at the highest level of the spectrum set out in draft Policy H10, 30% provision. Even if the 30% provision was to be applied to every residential scheme coming forward in York over the Plan period, which certainly will not be the case, the Council will only achieve 237 dpa. This will lead to a shortfall of at least 336 affordable dwellings per annum.

2.10 However, over-reliance on strategic sites with high infrastructure costs casts doubt on the delivery of affordable housing. As an example, the Section 106 Agreement for planning permission for 1,100 dwellings under reference 15/00524/OUTM for ST1 British Sugar has an Affordable Housing Baseline Provision of a mere 3%.

2.11 Based on the assessment at Appendix 2, the council should allow for a significant increase from the 867 figure towards the bare minimum of 1,066 dpa confirmed within the appended Housing Needs and Supply Report. To help address acute shortages in affordable housing provision, the 1,226 dpa figure noted above should be used in the interests of meeting extreme and historic housing need and planning positively for the future development needs of the city.

MIQ 2.6

- 2.12 Given the above we conclude that the acute need for affordable housing will not be met as a result of a range of factors. In particular we note:
- a. The SHMA assessment of 573 affordable dwellings per annum is out-of-date and need is likely to be greater than this. An updated SHMA should be prepared and should re-visit affordable housing need.
 - b. The OAN and housing requirement should be significantly greater than the 790 and 867dpa proposed by the Council.
 - c. Right to buy sales for York are relatively high compared to adjoining authorities. We see no reason for this trend not to continue.
 - d. Over-reliance on strategic sites with high infrastructure costs is likely to harm affordable housing delivery for some allocated sites.
 - e. Delivery of new affordable housing has fallen every year since 2015, with a mere 56 new-build affordable housing units in 2018-19.
 - f. Shortfalls in delivery in recent years have accentuated the need for new affordable housing stock.
- 2.13 Karbon Homes seeks to be part of the solution to meeting affordable housing need by proposing a 100% affordable housing scheme at Boroughbridge Road (former allocation ST29). The release of land from the General Extent of Green Belt such as former allocation ST29 should be brought forward through plan modifications.