

HEARING STATEMENT

CITY OF YORK LOCAL PLAN EXAMINATION

MATTER 2: HOUSING NEED REQUIREMENT

March 2022

Carter Jonas

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1.0 INTRODUCTION

- 1.1 Carter Jonas LLP (CJ) welcomes the opportunity to participate in the City of York Local Plan Examination in Public (the EiP) on behalf of Picton. This statement responds to selected questions set out within Matter 2: Housing Need Requirement of the Inspector's Matters, Issues and Questions.
- 1.2 The Inspector's Issues and Questions are included in bold for ease of reference. Where a specific question is not covered Picton has no further comment to make as part of this Hearing Statement.
- 1.3 This Hearing Statement is pursuant to and cross-references with previous representations by Carter Jonas in respect of the Pre-Publication Draft (Regulation 18); Main Modifications (Regulation 19) consultations in July 2019; and City of York Local Plan Proposed Modifications and Evidence Base Consultation (Regulation 19) in July 2021.

2.0 MATTER 2: HOUSING NEED REQUIREMENT

MIQ 2.1 The introduction above sets out our understanding of the Council’s position. Is it correct?

2.1 We consider that this is a question for the Council.

MIQ 2.2 In the Housing Need Update (2020) what methodological approach has been used to establish the OAHN and does it follow the advice set out in the Planning Policy Guidance (under the heading ‘Methodology: assessing housing need’)? In particular:

a) Has the 2018-based household projection provided the starting point estimate of overall housing need? In this specific regard, has the Council’s approach to identifying the OAHN been consistent with national guidance? If not, what is the justification for that?

2.2 As noted in our response to the Proposed Modifications and Evidence Base consultation in July 2021 we have concerns in relation to the use of the 2018 household projections. Planning Practice Guidance sets out that the Government’s stance in relation to the use of the 2016 and 2018 based household projections when calculating the Standard Method, identifying that the 2014-based projections are more appropriate. Whilst these principles relate to the Standard Method it does however highlight issues with 2016 and 2018 data and that caution should be taken when using these projections.

b) What bearing, if any, does the ‘standard method’ have on this Plan’s OAHN or on any other aspect of the Plan’s approach to housing?

2.3 The GL Hern Housing Need Statement 2020 [EX/CYC/43a] states in paragraph 4.20 that the standard method has “*no bearing on the housing need for York at the Local Plan examination*”. As the Plan is being considered under the 2012 NPPF the standard method is not a consideration. However, given the length of time that the Council have been preparing the Plan is may be prudent to give the standard method more consideration to ensure that there is flexibility for the future.

c) Have market signals been taken into account and, if so, what effect have they had on calculating the OAHN?

2.4 The GL Hern Housing Need Statement 2020 [EX/CYC/43a] identifies in paragraph 5.7 that

“We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited. For example, for the Plan period, the economic-led need of 779dpa is 157% higher than the demographic starting point of 302 dpa”.

2.5 This is a flaw in the housing need evidence that has informed the Plan and data on market signals should be given consideration to give a clear picture on the latest position in York.

2.6 It is well known and documented that the housing situation in York has deteriorated since the Plan was submitted in May 2018. House prices have continued to rise as documented in the UK House Price Index England: November 2021 (Published 19 January 2022) and closely linked to this affordability has worsened.

2.7 It is well documented and highlighted at the Hearing Sessions in December 2019 that the City is suffering from an acute affordable need following years of under provision. Although the recent appeal decision (September 2021) for Land at Boroughbridge Road, west of Trenchard Road, York referenced APP/C2741/W/21/3271045 was dismissed the Inspector highlighted in paragraph 29:

“it is clear from the submitted evidence that there is a legacy of a significant mismatch between need and supply in the City area.....There is no dispute between the main parties that York is one of the most unaffordable places to live in the country. Furthermore, it was demonstrated that this affordable need exists within both the locality of the site and the wider City area and shows no signs of arresting. Even on the basis of the Council’s calculation, the differential between need and supply is still very large”.

2.8 The housing crisis within York was also highlighted within the Barwood Appeal ref. APP/C2741/W/19/3233973 in 2021 in which the Secretary of State agreed with the Inspector in paragraph 22 that:

“All parties are agreed that there is a housing crisis in York and that a five-year supply of housing land cannot be demonstrated”.

2.9 The market signals should be given consideration to ensure that there is an appropriate balance between supply and demand within York.

d) How have employment trends been taken into account in determining the OAHN? How robust are the assumptions that have been made regarding those trends and what impact have they had on the final OAHN?

2.10 The Council have given consideration to employment trends however we have concerns regarding the proposed job growth target which is based on evidence prepared in May 2015 (SD063) and adjusted in 2016.

e) Does the economic-led OAHN assessment now still reflect an appropriate OAHN to be addressed and delivered through the Plan during the Plan period?

Due to clear issues with the job growth targets the OAHN remains inappropriate and should be reassessed to ensure economic growth.

f) Overall, has the OAHN figure been arrived at on the basis of a robust methodology and is it justified?

2.11 Whilst the OAHN has been guided by the methodology set by the relevant Planning Practice Guidance (PPG), Picton maintain that the methodology has been applied incorrectly and therefore the OAHN that has been arrived at is not robust or justified. It fails to give consideration to the continued growth of York's economy or the acute affordability pressures faced by the City. As a result, the OAHN is not justified or in line with the requirements of the PPG and the National Planning Policy Framework (NPPF).

MIQ 2.3 Has there been a meaningful change in the housing situation in York since the Plan was submitted and, if so, how should this be addressed in the Plan?

2.12 It is well known and documented that the housing situation in York has deteriorated since the Plan was submitted in May 2018.

2.13 Of note is table 7 of the Council's Housing Monitoring Update October 2021 highlights the steep drop in housing delivery with the average rate declining by more than half from 1,131 dwellings per annum in the three years to 2018 to only 544 dwellings per annum in the three years reported since. This decline reinforces why the Council should be taking a more positive approach towards meeting the city's current and future housing needs.

MIQ 2.4 Is the shortfall figure (for 2012-2017) of 32 dpa which is incorporated into the 822 dpa housing requirement still a robust and justified figure?

2.14 We continue to have concerns regarding how the shortfall figure (for 2012-2017) has been factored into the housing requirements. We consider that this figure is not robust or justified and that the Council should provide further clarification in relation to this.

MIQ 2.5 Does the 822 dpa housing requirement take into account any backlog or under delivery of housing in previous years? If so, how?

2.16 The Council's letter to the Inspectors dated 6 October 2021 [EX/CYC/43a] States *"the 822 dpa housing requirement was based upon a revised OAHN of 790 dpa, plus a further 32 dpa to account for a shortfall in completions between 2012-2017. This was consulted on as part of the Proposed Modifications Consultation (2019) and subsequently discussed at Phase 1 hearing sessions in December 2019"*.

2.17 According to PM21a of the Proposed Modifications 2019 [EX/CYC/20], the Update to Table 52: Housing Trajectory to 2033 to reflect the revised OAHN of 790 dpa, this shortfall to housing provision equates to 32 dwellings annually between 2017/18 to 2032/33, or 512 dwellings in total over the 16- year Plan period.

2.18 As mentioned above we, continue to have concerns regarding how this shortfall of completions from previous years has been factored into the housing requirements.

We also continue to object to the housing requirements being set at 822 dwellings over the plan period. As per representations previously submitted, we consider that the OAHN should be higher and in the region of 1,069 dpa. We consider that the points raised as part of representations to the Proposed Modifications (June 2019) and City of York Local Plan Proposed Modifications and Evidence Base Consultation (Regulation 19) in July 2021 are still relevant.

MIQ 2.6 Overall, is the housing requirement figure now proposed underpinned by robust evidence and adequately justified?

2.20 As mentioned within our previous representations we continue to have concerns with the evidence base provided by the Council which has been continually retrofitted throughout the Local Plan process.

2.21 The housing requirement and its evidence base must be viewed in the context set out within CJ Housing Needs and Supply Report submitted as part of the Proposed Modifications (Regulation 19 Representations July 2019). It is strongly considered that the approach taken by the Council sits at direct odds with the Government's explicit objective to boost the supply of housing and build and not in line with the methodology for assessing housing need as set out in the PPG in place at the time of the NPPF 2012 transitional arrangements, particularly in relation to the updating of evidence.

