

---

Dated: March 2022



**Examination of the City of York Local Plan  
2017-2033**

**Phase 2 Hearings**

**Matter 2  
Housing Need and Requirement**

Prepared by

I D Planning

On behalf of

Green Developments

---

---

## CONTENTS

	<b>PAGE NO</b>
1.0 Response to Matter 2 .....	1

---

## 1. Response to Matter 2 – Housing Need and Requirement

### The Objectively Assessed Housing Need (OAHN)

**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:**

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

- 1.1 It is unclear from the Housing Need Update (2020) paper how the Council has addressed the objectively assessed need for older people. There is no reference anywhere in this document to the needs of older people or York’s ageing population.
- 1.2 The submitted plan clearly identifies that York has a population that is older than the national average, with the SHMA Update document clearly identifying a need for 84 specialist units per annum and a potential need for 37 bedspaces per annum for people aged 75 and over.
- 1.3 The SHLAA Update sets out the following note regarding assisted living / over 55s accommodation: -

*Note Re: Assisted Living/Over 55’s Accommodation Please refer to Policies H3: balancing the Housing Market and H9: Older Persons Specialist Housing of the emerging Local Plan (Publication Draft February 2018 – Regulation 19 Consultation) that provides the annually assessed need for this type of accommodation which has been evidenced through the SHMA (2016), SHMA Addendum (2016) and SHMA Update (2017). The need for this type of accommodation has been calculated and forms part of our objectively assessed housing need (OAN) and we now monitor completions against this demand figure. The City of York Council SHMA and Addendum (2016) analysis identifies that over the 2012-2033 period there is an identified need for 84 specialist units of accommodation for older people (generally considered to be sheltered or extra-care housing) per annum. Such provision would normally be within a C3 use class and is part of the objective assessment of housing need. (underlining my emphasis)*

- 1.4 There is no explanation provided within the Housing Needs Update document which demonstrates how the need for housing for older people has been factored into the OAN calculation despite the identified need for older persons housing being clearly referenced in the submitted plan.
- 1.5 The Planning Practice Guidance relating to housing for older and disabled people stresses the importance of establishing the need for older persons housing and the need to provide clear policies to address the housing needs of this group.

- 1.6 The Council has not clearly demonstrated how the housing needs of this group has been factored into the OAHN figure. Given the Council have clearly identified that there is an identified need for this part of the population, the OAHN figure cannot be justified without a clear explanation of how this need is reflected in the proposed figure.

### The Housing Requirement

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

- 1.7 Our representation to the Proposed Modifications consultation identified there has been an under-delivery of housing for older people.
- 1.8 The Housing Update Report identifies the following completions in Table 3 of the Report (Components of Housing Completion Sites):-

Year	Type of Approval	Number of Sites with Completions	Gross Additional Homes Completed	Net Additional Homes Completed
1 <sup>st</sup> April 2018 – 30 <sup>th</sup> September 2018	Residential (Use Class 3) <sup>5</sup> Approval	48	214	196
	Sites Granted Certificates of Lawful Use/Development	0	0	0
	'Prior Approval' Sites (see paragraph 1.6 below for details)	4	28	27
	Development of Over 55s accommodation/Elderly Homes with limited care <sup>5</sup>	1	28	28
	Privately Managed Off Campus Student Accommodation	2	40	40
1 <sup>st</sup> October 2018 – 31 <sup>st</sup> March 2019	Residential (Use Class 3) Approval	57	164	151
	Sites Granted Certificates of Lawful Use/Development	0	0	0
	'Prior Approval' Sites (see paragraph 1.6 below for details)	1	1	1
	Development of Over 55s accommodation/Elderly Homes with limited care	1	6	6
	Privately Managed Off Campus Student Accommodation	0	0	0
<b>2018/19</b>			<b>481</b>	<b>449</b>

- 1.9 The table shows that just 34 homes for older people with limited care have been completed over the period 1<sup>st</sup> April 2018 – 31<sup>st</sup> March 2019. Which is just 40% of the annual target and an under-provision of 50 homes.

- 1.10 There is no evidence that the proposed housing requirement figure takes into account the under-delivery of housing for older people in previous years. This

---

under-delivery should be reflected in the proposed housing requirement figure otherwise this unmet need will not be addressed during the plan period.