

BANKS PROPERTY LIMITED

**EXAMINATION OF THE CITY OF YORK LOCAL PLAN
BANKS PROPERTY RESPONSES TO MATTERS, ISSUES AND
QUESTIONS FOR THE EXAMINATION**

MATTER 2: HOUSING NEED AND REQUIREMENT

FILE NOTE

The objectively assessed housing need (the 'OAHN')

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

- Q for LPA

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

As set out in our Matter 2 Hearing Statement from 2019, we do not believe that market signals were taken into account in calculating the OAHN and there is no evidence to suggest they have been taken into account in the 2020 Housing Needs Update.

The 2017 iteration of the SHMA concluded that there was a need for an uplift in the housing needs figures to reflect market signals and the acute need for Affordable Houses. Reported at paragraphs 5.6 and 5.7 is the following:

"In response to both market signals and affordable housing need we have advocated a 10% uplift to the OAN. In line with the PPG this was set against the official starting point of 867dpa. The resultant housing need would therefore be 953dpa for the 2012- 32 period.

The level of housing need identified is somewhat higher than the previous SHMA reflecting the increased starting point but also the inclusion of a market signals uplift. This OAN would meet the demographic growth in the City as well as meet the needs of the local economy."

The 2020 update suggests that consideration of market signals is not necessary due to an uplift for economic growth already being factored in. We do not believe that such an approach is consistent with national policy and guidance.

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

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?

The housing requirement

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?

The shortfall figure of 32 dpa is not robustly justified and coincidentally directly relates to the over delivery number from the 2021 HDT (which was subject to data mitigation due to Covid). When looking at the previous years of chronic under delivery, 32 dpa would not make a meaningful contribution to meeting the back log of housing need. The shortfall figure should therefore be significantly increased

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

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

Despite the Housing Needs Update (2020), Banks Property remain concerned that the proposed housing requirement is not underpinned by robust evidence and that it is not adequately justified. As set out in our Matter 2 Hearing Statements from 2019, Banks Property do not believe that the Council have followed 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 to support the assessment.

The OAHN does not take into account market signals, employment trends and affordable housing need. Further uplifts are required to address all of the above matters and ensure the total housing figures are justified and positively prepared.

The housing delivery test 2021 showed that 2021 was the only recent year in which York had met their local need (albeit only by 32 dwellings). Further, the housing requirement figure does not relate to that within the Council's vision for their Local Plan.