

York Labour Party (YLP) Phase 2 MiQs Response

Matter 5: Housing Land Supply

Inspector's Question	Our response	References
<p>The housing land supply overall</p> <p>5.1 Does Policy SS1, and the Plan as a whole, provide an appropriate policy framework for the delivery of housing over the Plan period? If not, how is this to be addressed?</p>	<p>No, for the reasons we have set out in our previous submissions and in our response on matters 1 & 4 terms of the lack of sustainability of many of the sites due to being too small to support the necessary range of facilities, and public transport links.</p>	
<p>5.2 We understand through the latest housing trajectory update [EX/CYC/69] that the sources of housing land supply underpinning the Plan are as follows:</p> <ul style="list-style-type: none"> · 8,642 dwellings on allocated new strategic housing sites (ST) · 1,703 dwellings on allocated housing sites (H) 	<p>We feel there are significant issues with a number of the assumptions on housing supply, which undermine the overall make up of the housing completion numbers.</p> <p>Of significant concern are the 720 dwelling in communal and student establishments which we feel is likely to be a gross underestimate of the demand based on the continuing unanticipated growth in student numbers we have flagged in our earlier response to question 2.3, and the constraints on future on-campus provision (which raises questions about the policies for them and the use of site ST 27). Figures of completions and consents since the original hearings demonstrate the continuing high demand for PBSA despite the Plan's evidence base (SID 051) indicating that no further provision was likely or required and the consequent failure to allow for this element of demand in its housing numbers.</p>	<p><u>Housing Monitor</u></p>

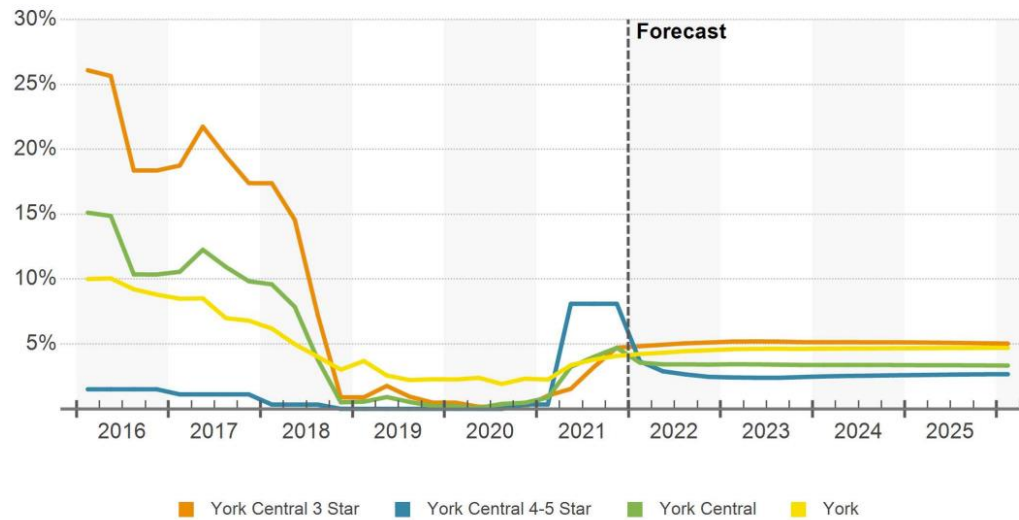
<ul style="list-style-type: none"> · 1,853 dwellings (commitments – unimplemented permissions as at 1 April 2021) · 3,113 dwellings (cumulative completions between 2017-2021) · planning permission or resolution to grant planning permission as at 1 April 2021) · 720 dwellings in communal establishments /student accommodation · 1,764 dwellings on windfall sites (from 2024/25 – 2032/33 @196 per annum) <p>This provides a total housing supply of a minimum of 17,795 dwellings during the Plan period. Is this correct?</p>	<p>In respect of Purpose Built Student Accommodation (PBSA) there have been 888 off-campus completions (2016- sept 2021) and 438 consents during the same period (next CYC Housing monitor due April 2022, i.e. post submission deadline). Even though not all of the completion/consents will be counted on the housing completion figures, if even 25% were classified as dwellings this would well over half the total in 5 years of the overall estimate over the lifetime of the plan. Our concern is that if these PBSA become, as seems likely given the level of growth of the two Universities student numbers, the main form of housebuilding on brownfield sites, it will both skew the overall housing delivery figures, not address the pressing need for general needs housing, and as we have seen in practice, result in employment sites in the city centre sold with the consequence for jobs and wages.</p> <p>Our concerns regarding windfall sites shows that since the first phase hearings, and for a number of years before that, by far the largest group of windfalls are from Conversions and change of use (see table 2 below), many of which are excessively depleting office and small employment sites and availability and making it difficult for York business start-ups and expansion or bringing new jobs to York (see also our response to question 5.4). Other windfalls have tailed off.</p>	<p><u>ex-cyc-56</u></p>
--	---	--------------------------------

Table 2: Historic Annual Windfall Completions Separated into Size and Type

Year	Very Small Windfalls (net)	Small Windfalls (net)	Medium Windfalls (net)	Large Windfalls (net)	Conversions (net)	Total (net)
2010/2011	58	29	19	172	66	344
2011/2012	30	6	16	21	44	117
2012/2013	28	5	19	12	58	122
2013/2014	36	19	8	45	56	164
2014/2015	16	26	24	0	116	182
2015/2016	34	11	389	0	216	650
2016/2017	26	0	91	0	399	516
2017/2018	49	91	2	0	166	308
2018/2019	103	0	0	2	155	260
2019/2020	48	11	4	13	111	187
Totals 10-20	428	198	572	265	1387	2850

The conversions have taken out a lot of 3* floorspace as can be seen by the secondary indicator of the massive drop in vacancy rates for such properties in York Central (source: January 2022 Co-star report):

VACANCY RATE



It therefore seems highly unlikely that there will be anything like the previous availability of office conversions as a consequence.

We have also made the point earlier about the major growth of Airbnb and other short-term lettings along with suggestions as to how that pressure should be handled in question 2.3, but if those approaches are not supported extra provision is required for further loss of residential accommodation to short term letting.

5.3 We note that the windfall allowance per annum has been increased from 169 dwellings per annum in previous housing trajectories (e.g.

See above

<p>[EX/CYC/17]) to 196 dwellings per annum in the 2021 Housing Trajectory [CYC/EX/69]. Is this correct? If so, what is the basis and justification for this change in the windfall allowance?</p>		
<p>5.4 Is the estimate of windfall numbers identified by the Plan appropriate and realistic? Is the approach consistent with the Framework? Given the time that has passed since the Plan was submitted, is the identified windfall allowance in the Plan (169 dwellings per annum) still appropriate, realistic and justified?</p>	<p>No. There are signs of traditional windfalls declining, and increased dependency on conversions which we do not feel is sustainable (see our response to the question 5.2). It also risks hollowing out the core of the city. We have recently seen, a plumbing contractor, a bingo hall, office complexes and a car repair large site all lost to PBSA. Further erosion of the economic infrastructure of the city will negatively impact on jobs and job prospects for York residents. The near uniform conversion to PBSA will further increase pressure on other areas to deliver the general needs housing the city needs and increase car-based commuting. We have argued in our previous submissions and in our response to question 3.2 that the LP should have additional policy to limit the loss of commercial / key remaining office sites which will constrain further conversions, and reinforce the cut to that element of windfall numbers. Officer views that it would be prudent not to rely on the full numbers were ignored in preparing the current version of the plan (unlike its predecessor) – we continue to believe only half the trend based number should be assumed in the supply figures.</p>	
<p>5.5 Are the suggested rates of planned housing development realistic and achievable when considered in the context of the past completion rates? What actions are being taken to accelerate housing delivery? Where</p>		

<p>is the evidence to support the approach adopted?</p>		
<p>5.6 Is the housing trajectory update [EX/CYC/69] realistic? In the context of footnote 11 of the NPPF, does it form an appropriate basis for assessing whether sites are deliverable?</p>	<p>We do not feel that this is deliverable without further work to significantly expand some sites such as ST14 and ST15, or by using the previously proposed Winthorpe ST15 site, so as to ensure both sufficient housing numbers and the necessary community and transport infrastructure is delivered to support them (reference our response to matter 1).</p>	
<p>5.9 The five-year housing supply, as set out in the latest housing trajectory update [EX/CYC/69], includes an allowance for windfall sites – the aforementioned 196 per annum:</p> <p>a) What is the compelling evidence that such sites have consistently become available in the local area and that they will continue to provide a reliable source of supply?</p> <p>b) Is the allowance made realistic, having</p>	<p>We do not believe the evidence is compelling, quite the reverse, as we have outlined in our response to questions 5.2 and 5.4 above.</p>	

regard to paragraph 48 of the Framework?		
<p>5.11 Paragraph 5.9 of the submitted Plan identifies that the Council accepts that there has been a persistent under delivery of housing as defined by the NPPF. As such, does the submitted Plan, and any subsequent submitted evidence on meeting housing need and supply, take into account the requirement for a 20% buffer to be applied to the housing supply? Has this buffer been applied to any subsequent update of evidence or proposed modification to the Plan identified?</p>	<p>No, it does not a full 20% buffer, and it certainly should do given past delivery problems.</p>	