

York Labour Party (YLP) Phase 3 MIQ Response

Matter 1: Affordable Housing

Inspector's Question	Our response	References
<p>1.1 What is the need for affordable housing?</p>	<p>The proposed local plan affordability evidence base is GL Hearn's June 2016 Strategic Housing Market Assessment report. This indicated that 573 additional households a year would need support with housing based on 2014/5 year data for house prices and rent levels. This affordable need represented 69% of the overall housing need. The June 2016 update report incorporating the 2014 SNPP upped the 573 figure to 627. There was no further review of the affordable housing aspect in Hearn's subsequent May 2017 pre-submission update. However Hearn's reverted to referencing the 573 figure (with no explanation as to why), as does the Council's Dec 2019 phase 1 written submission and its Feb 2020 Affordable Housing supply note. The two other post-submission SHMA updates from Hearn's (dated January 2019 and September 2020) do not update the affordable housing need assessment and deliverability threshold information either. The Council is therefore relying on a superseded six-year-old analysis of affordable housing need and site provision thresholds using 7-8 year old data. This is surely inappropriate, given the evidence we put forward at the phase 1 and 2 hearings on the continuing significant worsening of both house price and rent affordability in York (see our phase 2 matter 2 submission for the latest statistics – link to right), which is likely to mean these numbers & the housing support percentage will need upping significantly.</p> <p>There is also further anecdotal evidence on the consequence of what has been going on and lack of affordable and new family housing for the local market in the recently published 2021 census data when compared with the preceding 2011 data. This shows a significant absolute decline in the under 15 child population (focused on the 0-4s) in the city (-900 rounded off) compared to a national increase, with York's under 15 population representing only 14.2% of the total against a Wales & England average of 17.4%. The 25-34 post university year</p>	<p>Q SD051</p> <p>SD052</p> <p>SD050</p> <p>Ex/CYC/36, Ex/HS/M2/HR/0</p> <p>Ex/CYC/14a and/43A</p> <p>https://www.york.gov.uk/downloads/file/7569/ex-hs-p2-m2-oahn-19-york-labour-party</p> <p>How the population changed in York, Census 2021 - ONS</p>

	<p>group has grown less than the national and the 40-49 age group, the primary family raising age groups, has also seen a rather more significant absolute decline relative to the national picture.</p>	
<p>1.2 Does the provision for affordable housing in the Plan properly and pragmatically reflect that need?</p>	<p>No, it does not.</p> <p>Hearn’s original SHMA also referencing a then (2016) potentially achievable 25-40% affordable housing ratio for new developments, with actual typical ratios of 20-30%. The Council chose to set a 20% brownfield, 30% greenfield target for larger sites producing r 15 dwellings and above in its draft plan. Unless we have missed something, we do not see clear evidence or justification for the Council choosing these low threshold figures, given the major affordable housing need shown in the SHMA (leave aside post 2016 issues), and believe the Council should be asked to explain their rationale for their original choice, and failure to update it subsequently. For comparison Cambridge sets a 40% affordable target on all sites of 15 units and above, Oxford 50% for 10 units and above. Oxford also specify 40% must be in the form of socially rentable.</p> <p>In our original 2018 submission (section B, sub-section 4.1), we argued these large site thresholds were inadequate and proposed a compromise 25% brownfield / 35% greenfield pair of thresholds for 15 properties and over (to still allow some flexibility). The evidence given in the previous phase 2 hearings on Matter 6 that the current developer obligations could be met on all sites bar the largest new settlements suggests that our proposed increased thresholds should definitely be possible for most sites, as we have confirmed in recent discussions with some developers / agents, and the couple of exceptions can be dealt with under the exceptions provision in the proposed policy. Even that scenario might become unnecessary if the Council chose to reinstate the original larger new settlement site allocations which they arbitrarily reduced in the submission version of the plan (please see also our further comments on the new settlement allocation size and viability issues in matters 4 & 7). We would ask the Inspectors to push this course of action both to increase the affordable housing supply but also for the other reasons we and other like the York Civic Trust and York</p>	<p>SD051 Para 6.97</p> <p>SID 364</p> <p>HS/P2/M1/SV/16 & HS/P2/M4/SS/21</p>

	<p>Environment Forum have put forward regarding minimum size thresholds for more sustainable new settlements in our earlier submissions, and particularly in phase 2 Matters 1 & 4.</p> <p>We would also reinforce our point in those submissions about the need to achieve settlement sizes which produce a good range of local services and high quality 7 day a week bus service links to the city / main employment areas. In recent discussions with one of the local RSLs (Registered Social Landlords) we were made aware of the problems RSLs have in letting out of urban area properties in smaller settlements with poor public transport links, and the social isolation it can lead to for their occupants. Potential tenants are reluctant to accept such properties because of the difficulties accessing jobs, services and friends. Given the plan's reliance on these larger new settlements for a substantial proportion of its future affordable housing supply, it is crucial that we don't end up with provision that doesn't work for its anticipated users / the RSLs.</p> <p>In conclusion, we consider the policy, amended as suggested, is essential to help address the extreme housing affordability gap in York, which we have outlined in our original 2018, 2019 submissions and most comprehensively with up to date data in our written submission on matter 2, questions 2.2b) 2.3 and 2.5 at the phase 2 hearings, and we would particularly draw the Inspectors attention to our answers there.</p>	
<p>1.3 Should the housing requirement be uplifted to reflect the need for affordable housing?</p>	<p>Yes. Since a range of need both for affordable and intermediate housing is required and the position further exacerbated since submission, as we have previously covered.</p>	
<p>1.4 What would be the effect of such an uplift?</p>	<p>The effect would be to reduce the very large shortfall in affordable housing supply. From discussions with developers / agents, we do not believe the extra 5% on the two main thresholds would deter proposed developments coming forward, subject to the Council fairly operating the exception route for the small number of large new settlement sites as necessary.</p>	

<p>1.5 Is Policy H10 soundly based?</p>	<p>No, as we have touched on in the preceding responses, the key brownfield and greenfield affordable housing thresholds had been set too low against the G.L Hearn estimate of a potentially achievable 25-40% and the very high need for affordable housing in York. We consider a more ambitious policy is essential to help to address the extreme housing affordability gap in York, which we have outlined in our original 2018, 2019 submissions and most comprehensively with up to date data, in our written submission on matter 2 , questions 2.2b) 2.3 and 2.5 at the phase 2 hearings, and we would particularly draw the Inspectors attention to our answers there.</p>	<p>SID 364</p> <p>https://www.york.gov.uk/downloads/file/3696/ex-hs-m2-hr-23-ylp-ylg</p> <p>https://www.york.gov.uk/downloads/file/7569/ex-hs-p2-m2-oahn-19-york-labour-party</p>
<p>1.6 Is the approach to OSFC a reasonable one?</p>	<p>No. The current policy, in as far as it exempts purpose-built student accommodation (PBSA) from providing a current affordable housing contribution (i.e. a contribution is only applied if the student use subsequently ceases) together with the fact that no education contribution is applicable has been having the effect of pricing out bids based on the provision of ordinary local housing provision of city brownfield sites, which require both. We identified this in our previous submission, see our written response to the phase 2 MiQ questions 5.2 & 5.4 and we have more recently confirmed this remains the position in recent discussions with local developers / agents. We would also refer you to the precedent of Oxford’s Local Plan – Policy H2 section b) on this.</p>	<p>HS/P2/M5/HLS/15</p> <p>OCC Oxford 2036 Adopted single pages (3).pdf</p>
<p>1.7 Will the alternative source of supply (in policy GB4) make any material difference?</p>	<p>This policy, which we are supportive of, is allowed under the NPPF as being for “limited affordable housing for local community needs” and is therefore by definition only likely, if exercised, to provide small numbers. The fact that it has not been exercised much nationally as we understand it, tends to confirm that’s its contribution will be marginal.</p>	