



# City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES DATA TRENDS **INDIVIDUAL RESPONSES**

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Respondent #458 ◃ ◀ ▶

COMPLETE

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Page 1: Survey Information

**Q1**

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

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Yes

Page 2: Register for consultation

**Q2**

Your name:

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Merrill Davis

**Q3**

Contact details:Please provide email and/or address

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Address [REDACTED]

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Address 2 [REDACTED]

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City/town [REDACTED]

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Post code [REDACTED]

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Email address [REDACTED]

**Q4**

Do you wish to be notified when the City of York Local Plan is adopted by the Council?If yes we will use contact details provided above

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No

Page 3: Your response

**Q5**

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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Proposed Main Modifications - link

Share Link

[REDACTED]

COPY

459 responses



SIGN UP FREE



To which section does this response relate?

Section 5: Housing

Page 5: Section 2: Vision

**Q7**

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

**Q8**

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

**Q9**

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

**Q10**

To which modification does this response relate?

MM5.17 Policy H7: Student Housing

Page 9: Section 6: Health and Wellbeing

**Q11**

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

**Q12**

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

**Q13**

To which modification does this response relate?

Respondent skipped this question

Page 12: Section 9: Green Infrastructure

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To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

**Q15**

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

**Q16**

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

**Q17**

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

**Q18**

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

**Q19**

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

**Q20**

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

**Q21**

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

**Q22**

Do you support or object to the proposed modification(s)?

Object

**Q23**

If you object, please select your reason from the list below (select all that apply):

---

Not positively prepared - i.e. strategy will not meet development needs

---

Not justified - i.e. there is no evidence to justify the modification

---

Not effective - i.e. it won't work

---

Not consistent with national policy - i.e. doesn't comply with the law

**Q24**

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

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Please see PDF on my views. It is on more generally student housing and the allocation for the university, and ensuring enough student housing is delivered to meet student demand and the current shortfall

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This submission is mostly focused on the impact the local plan may have on the delivery of a sufficient number of student accommodation to cater for the shortfall currently experienced by current students and ensuring that at a minimum supply can increase to meet the expected increases in student numbers during the planned period. I believe the plan is unsound as it does not cater for the needs of students, which for the 22/23 academic year stand at around 27000 full time students in the two main universities in York.

For context I am a first-year undergraduate at the University of York, and the motivation for submitting this is due to the staggering increases in student rents this year, with the average moving from 135 including bills to around 180 a week including bills, with certain large agencies such as Adam Bennet and IG property charging an average 185+ a week.

As well known the three main housing options in York are university provided accommodation, private PBSAs, and HMOs. There is also some one/two bedroom flats which are rented primarily to students with fixed term tenancies aligning with the academic year.

I will try to use the 2012 NPPF in this, but may at times use the latest one on the government website as I assume some weight is given to newer guidance. In addition to this, the newest edition references students and purpose built accommodation, which perhaps may suggest the increased importance of ensuring that local plans meet student needs, as much as all other groups. The main section for this I'm referring to is point 62, "*Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers<sup>27</sup>, people who rent their homes and people wishing to commission or build their own homes).*"

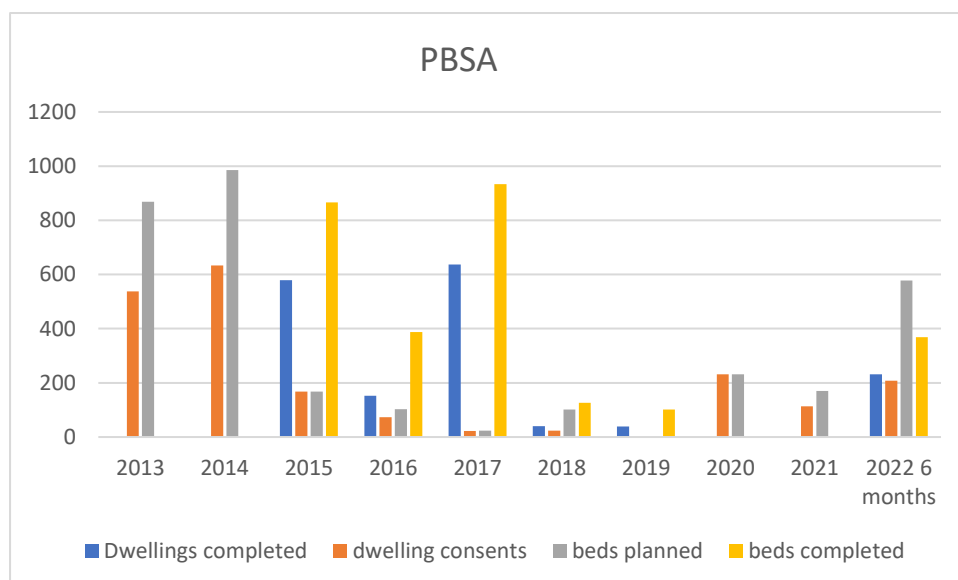
As a general note on HMO limits, as it is not possible for any permutation of 100m areas in a newly built development to breach 10%, it is not possible for the neighbourhood level to breach 10% either. Additionally as the way in which the 10% limit is enforced through blocking any new HMO which would bring the street level above 10%, the effective limit is some number below 10%. To further add on to this, unless the approval of HMOs is done in a specific way for certain houses, the limit will be lower again as some houses will affect the street limit for far more properties than the average property in the development, for example a property in the middle of an estate vs the edge. Given the lack of strategic sites in close enough proximity to the university, (bar ST4), it can be safely assumed that the strategic housing sites, that will make up the most of the general housing completions, will have an inconsequential effect on the level of student housing in the city.

**The effect of this is that all student housing need will need to be provided by either university accommodation or off campus accommodation. This makes analysis of potential supply to meet housing need a little easier. I have the belief that the local plan would not be positively prepared if it is not possible to meet student housing needs, and therefore the local plan being unsound.**

The local plan provides ST27 and SH1 as land available for the expansion for the universities, however, as is made clear by the university of York in their submissions and hearing statements, ST27 is only enough to accommodate growth of 1.5% per year beyond their 5 year plan ending 2026, resulting in a total FTE student headcount of around 27000, additionally this is only when housing 46% of students. Assuming around 10% of students live at home while studying at the university (see Phase 3 matter 3 hearing statement on behalf of uni of York, P15, excluded 2020 and 2021 data as huge change, which could be due to students moving home when the data was collected due to online learning, or perhaps some other reason which could cause a temporary change) this results in

somewhere between 40-45% of new full time students requiring accommodation to be built off campus, effectively a 1:1 ratio between new accommodation built on and off campus.

The local plan leaves all off campus development to windfall sites, as has been the case for all the off campus developments over the last 8-9 years as these have cropped up around the city. However, the local plan provides no analysis and provides no justification on how this is reasonable or possible. Looking at development over the last 10 years, while developments started off strong, with large numbers of beds consented in 2013 and 2014, however this quickly reduced, to having little to no approvals. Note: This graph shows years from April 1<sup>st</sup> to march 31<sup>st</sup> the following year



There is now evidence it has begun to increase, with approvals beginning to increase from 2020. It isn't entirely clear why either proposals decreased and / or schemes were refused more, given student numbers have continually increased, and until 2018 there was no proposals for additional student accommodation on campus, I have thought of a range of reasons:

- a. Change of leadership, with lib dem and conservative coalition gaining power in 2015, on the backdrop of wanting to reduce local plan annual homes from 1100 to as little as possible, perhaps they were more open to refusing applications for any possible reason. This is evidenced through some schemes only going through on appeal, as well as comments made when revised alton park scheme was approved last year, where councillors openly stated that they rejected the original scheme well aware it would almost certainly succeed on appeal, but happy that there is a delay on appeals due to covid backlog.
- b. Given the three large schemes were completed between 2015 and 2017 perhaps developers felt more skittish on demand
- c. The accommodation shortage didn't really kick in till as flexibility in supply of HMOs dampened shortage temporarily, as well as over subscription to UoY during covid.
- d. Lack of windfall land

If the reasoning was due to skittish demand from developers, then perhaps little can be done in the local plan to ensure enough student accommodation is built, however for the other reasons I think it suggests that an alteration in the local plan to develop a strategy to ensure student housing need is met. For example this could involve a target to meet each year for off campus accommodation, or alternatively if availability of windfall land is scarce or unpredictable, given the large shortfall now experienced, a strategic site allocation for either additional York university accommodation beyond

46% of new students (and meeting current shortfall) or for a range of developers to create an equivalent number of PBSA bedspaces.

Calculating current shortfall:

Since 2012/13 there has been an increase in FT students at the university of York by 5340, (19600-14260). Source: [Student statistics - About the University, University of York](#)

York St john has increased from 4670 FT to 7360 FT in 2021/22, however data for 2022/23 is not available on the source, which is HESA. Given York uni reduced to midpoint between 2021 and 2020 intake, out of abundance of caution to not overestimate FT students I will use 2020/21 full time for York st john at 6965. Resulting in an increase since 2012 of 2690.

Together this results in an increase of 8030 FT students since 2012. The total increase in PBSA beds since 2012 appears to be around 2780, based on housing competition stats published by York council each year

For campus accommodation completed there is Langwith, Constantine, David kato and anne lister, totalling around 2720 beds.

For HMOs it's a bit more tricky: Using planning search I can see there has been 212 c3 to c4 conversions, search parameters: keyword: "c4", decision: "approve", decision date: "20/04/2012" to present. Assuming this averages 4.5 beds as they range from 3 bed to 6 bed, this is probably around 1000 beds increase.

Doing the same decision and date search but with sui generis and counting the increase in beds and properties results in up to 88 bed increases over 19 properties, depending on if counting a small number of reductions from sui generis to c3.

```
1 bedroom increase yo10 4bd
3 bedroom increase yo30 6dh c4 to sui
7 bedroom increase yo10 5au c1 to sui (and additional c4 counted separately)
8 bedroom increase yo31 7yg c1 to sui
3 bedroom decrease yo10 4pj 10 bed hmo to 7 bed hmo with 2 class c3 flats
1 bedroom increase yo30 5rz c4 to sui
maybe 8 bedroom yo24 3bz retrospective sui. somewhere between 6 to 8 beds
maybe 2 bedroom decrease yo31 0aa sui to c4, 8 bedroom to 6 bid hmo with separate 1 bed bungalow
9 bedroom increase yo10 4bd c1 to sui
3 bedroom increase yo10 3ef c4 to sui
8 bedroom increase yo10 4ay c3 to large hmo sui
1 bedroom increase yo10 4hs c4 to sui
8 bedroom increase yo31 0aa c1 to sui. (note this is reduced to 6 bed seen later)
9 bedroom increase yo24 1bd c3 to sui
7 bedroom increase yo10 3js c3 to sui
4 bedroom increase yo31 0sy c4 to sui
1 bedroom increase yo10 3hb c4 to sui
8 bed or 2 bed increase yo30 6ds ? to sui, if already hmo then just 2, otherwise 8, assume higher
2 bedroom increase yo10 4hs c4 to sui
2012 begin
```

An increase of about 200 homes is backed up by council tax data:

In this article: <https://www.yorkpress.co.uk/news/11043976.figures-reveal-fall-in-number-of-student-lets-in-york/> It states that there were 3701 properties which were council tax exempt due to student status in 2012. In the submission to phase 3 matter 3 hearings on student housing by Councillor Warters, who also was the source of the article on numbers in 2012, he states that the number of council tax exempt homes is now 3900.

This results in a total increase of 2780+2720+1100 = 6600 bedspaces since 2012.

This shows a shortfall of 1430 student bedspaces over this period. This amount may be higher depending on the average number of beds in HMO C4 class, and as it can be assumed some PBSA and HMOs are not available to be rent some years, for example if under refurbishment. Additionally with stronger tenancy laws on the horizon, particularly the introduction of minimum energy rating C, this could reduce some of the available HMOs, as anecdotally when applying this year for my second year accommodation a very large amount of these were band D or E. However better evidence is needed for this, and should be available to the council once the additional licensing is compulsory from April this year.

There is currently around 700 consented to September 2023, and since then a further 200 beds have been approved at peppermill court as part of a scheme by st john university, and 275 bed scheme at a former mecca site. Adding these 2 schemes on results in about 1175 bedspaces to be completed over the next 3 years, which, if student levels remained the same for the next 3-4 years the shortfall would be just 255 bedspaces to have the same difference in accommodation.

**However as we know, both universities plan to continue growing student numbers, and furthermore I am only counting full time students, not including visitors and part time which may wish to rent student accommodation aswell.**

The York university 5 year plan in phase 3 matter 3 hearing statements details an increase by just over a thousand in what I assume is full time and part time students by 2025 academic year. Given the vast majority of students are full time, 19600 vs 1135 for this year, a slight adjustment down to 1000 can be made, which swallows up all the off campus built from these consents, and leaves a greater shortfall once st john student projected student increases are taken into account.

For this reason, I would still argue that the local plan is currently not sound until it develops a strategy to ensure that there is adequate provision built, and that supports these schemes to be built.

As a final addition to the idea of having a strategic site allocation off campus, issues raised previously in relation to the use of windfall sites for PBSA developments include the loss of employment land, or land that could have been used for general housing.

**Another key problem within the justification for the size of ST27 as well as the exclusion of student housing from the general housing requirement is that it massively underpredicts student growth.**

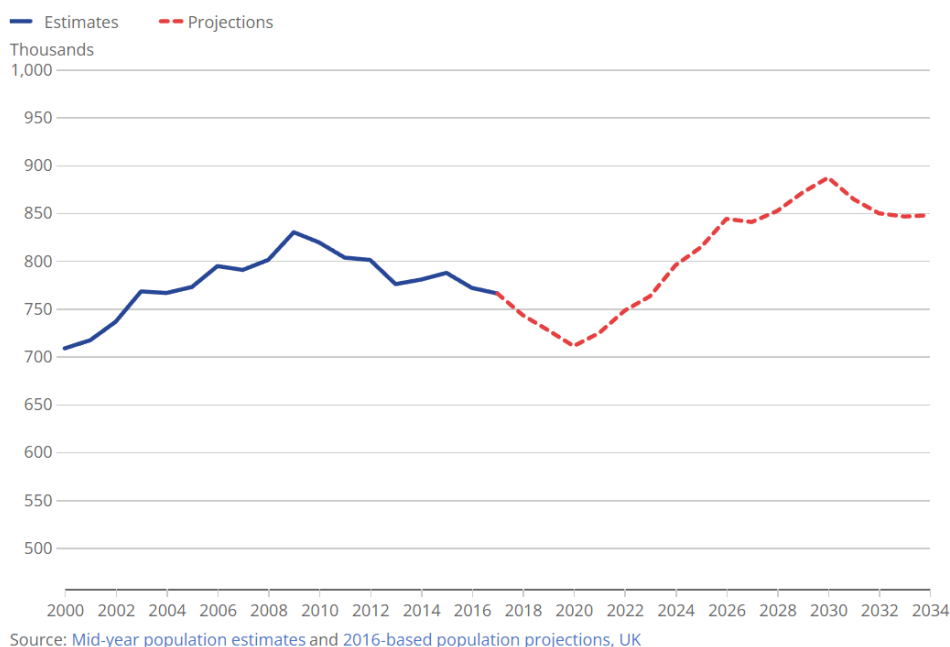
In the GL Hearn Strategic Housing Market assessment they use deliberate data samples and demographic predictions to try and reduce the general homes requirement from 1100 to as little as possible. Included in this is a very large under prediction in student numbers.

Most importantly, they use the demographic change at the time, (2016) when the number of people aged 18 was falling to suggest that over the plan period of 2018-2032 and beyond there will be fewer graduates by nature of the demographic.



This completely ignores that after 2020 the number of people reaching the age of 18 will rise significantly. Primarily due to higher birth rates 18 years prior.

### Estimated and projected number of 18-year-olds in the UK population, 2000 to 2034



Source:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/articles/being18in2018/2018-09-13>

While this is based off 2016 projections so could be slightly out of date, the vast majority of the increase and existing amounts is just based off births 18 years prior, which wont change.

Additionally, in the September 2020 assessment by GL Hearn they again try to justify a lower housing figure more generally, using the 2018 based SNPP published in March 2020. In this they cite a consultation on the standard method, and the lower housing figure it provides at 763 dpa as a “comfort that the latest version of the standard method arrives at a very similar number”. However on the 1<sup>st</sup> of April 2021 after the consultation ended the government ultimately rejected the proposal, and confirmed that the current NPPF should continue to only use the 2014 projections, which the GL hearn paper sets out at 1026 dpa.

Source: <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system>

As a final note on these papers that are used to under predict possible student growth over the planned period is that they use the demographic data to try and justify ignoring the trend seen before 2016 and ultimately seen again post 2016 to present of increasing proportions of young people going to university.

If these trends continue as they have, then it justifies a much larger allocation towards the university, and a more detailed strategy on off campus accommodation to ensure that there is

enough space for the university to grow and crucially that enough accommodation can be built to house all these students. I won't go too much into the amount given this is already extensively and in great detail examined by the university of York's submissions, but perhaps this could be the proposed safeguarded land by the university, or the land south of ST27 which is currently slated as greenbelt. As a final note on this it is odd that the land around ST27 is all put as greenbelt given even if growth is slow to 2038, it is the natural area for expansion of the university at some point in the future, and by putting it in greenbelt only seeks to constrain the university in the longer term, or perhaps force a higher density build on the existing campus, which may threaten the parkland setting of it. Source for idea of development south of ST27 :

[https://planningaccess.york.gov.uk/online-applications/files/62AC4DB165FEFE075A825393882DA071/pdf/LOCPLN\\_16\\_00001-ID\\_1673\\_-\\_UNIVERSITY\\_OF\\_YORK\\_-\\_JANET\\_ONEILL\\_ASSOCIATES\\_ST27-1819316.pdf](https://planningaccess.york.gov.uk/online-applications/files/62AC4DB165FEFE075A825393882DA071/pdf/LOCPLN_16_00001-ID_1673_-_UNIVERSITY_OF_YORK_-_JANET_ONEILL_ASSOCIATES_ST27-1819316.pdf)

Its certainly my view that in regards to the allocation for the university, the most sound plan would be one that allows for the university to deal with any growth scenario, and possibly more easily increase the proportion of new students or current students they house if there is a lack of windfall sites, or something major happens to the stock of HMOs.