

## **Matter 1 – Affordable Housing**

### **1.1 What is the need for affordable housing?**

1. The 2020 Housing Need Update and the Affordable Housing Note (February 2020) do not review affordable housing need, but the Affordable Housing Note continues to identify a need for 573 affordable dpa. This Note acknowledges that the most recent assessment of affordable housing need for the City remains the 2016 SHMA, which identified a net affordable housing need of 573 homes per annum or 12,033 dwellings over the 2012-2033 period. It is possible that the need for affordable homes has increased since this work was undertaken. Particularly when you consider the numbers of households on housing waiting lists in York have seen an increase over the last 5 years from 1,216 in 2016 to 1,738 in 2021<sup>1</sup>. And Government data<sup>2</sup> on housing affordability (2020 & 2021) which shows that the ratio was 8.04 in 2020 and 8.41 in 2021 in York, and for the lower quartile 9.17 (2020) and 9.67 (2021) in York and 7.18 (2020) and 8.04 (2021) for England. This shows that affordability in York is getting worse and for the lower quartile is worse than the national average.

### **1.2 Does the provision for affordable housing in the Plan properly and pragmatically reflect that need?**

2. The HBF is concerned that the provision affordable housing in the Plan does not reflect the identified affordable housing need. The HBF notes the content of the Affordable Housing Note (February 2020). It highlights the potential supply of affordable housing from Policy H10 and from the Council's Housing Delivery Programme. The Council project that a total of 3,539 affordable homes will be provided with an average of 221 affordable dwellings per annum provided up to 2032/33. The Note highlights that the supply is only around 38.6% of the affordable housing need, and that historically affordable housing completions have been less than 10% of the total completions. The HBF is concerned that the evidence provided by the Council continues to identify that the affordable housing need will not be met. The HBF considers that it may be appropriate for the Council to consider a further uplift in the housing requirement to help to contribute to the delivery of affordable homes.

### **1.3 Should the housing requirement be uplifted to reflect the need for affordable housing?**

3. The HBF considers that the housing requirement should be uplifted to reflect the need for affordable housing. An uplift could help to address the affordable housing need. The HBF considers that any uplift is also likely to need to be accompanied by additional further allocations in appropriate locations that will be viable and will provide an appropriate additional contribution to the affordable housing requirement.

### **1.4 What would be the effect of such an uplift?**

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<sup>1</sup> Table 600: Numbers of households on local authorities housing waiting lists

<https://www.gov.uk/government/statistical-data-sets/live-tables-on-rents-lettings-and-tenancies>

<sup>2</sup>

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2020#local-authority-analysis>

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Examination of the City of York Local Plan 2017 – 2033  
Matters, Issues and Questions for the Examination (Phase 3)

- 4 This uplift could help to ensure that increased numbers of affordable homes are delivered. Any uplift in the housing requirement should help to ensure that proportionately the number of affordable homes provided is increase. However, the impact of such a policy will be reliant not only on an uplift in the housing requirement but also in ensuring that appropriate locations for development are identified which will viable and provide an appropriate level of affordable housing as part of their delivery.

**1.5 Is Policy H10 soundly based and in accord with national policy?**

- 5 NPPF 2012<sup>3</sup> states that to deliver a wide choice of high-quality homes, local planning authorities should set policies for meeting affordable need, where the need is identified. It goes on to state that such policies should be sufficiently flexible to take account of changing market conditions over time. Whilst paragraph 173 states that to ensure viability the costs of any requirements likely to be applied to development, such as requirements for affordable housing . . . when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.
- 6 Therefore, the HBF consider that it is important that Policy H10 is flexible, viable and enables new homes to be delivered.
- 7 The HBF is concerned that part (v) of the policy looks for the affordable homes to be fully integrated throughout the development with no more than two affordable dwellings placed next to each other. The HBF considers that this requirement for no more than two dwellings to be placed next to each other, may cause issues with the management of the properties and may not be in line with the requirements of individual registered providers. The HBF considers that further flexibility is likely to be required in this policy and that the limit of two dwellings is inappropriate.
- 8 The second paragraph states that a vacant building credit will be applied to appropriate development. Further detail is given in relation to this in paragraph 5.72 which appears to require a viability assessment to be provided, this does not appear to be in line with the guidance in the PPG<sup>4</sup>.
- 9 The third paragraph of this policy states that affordable housing should remain affordable in perpetuity or if these restrictions are lifted for subsidy to be recycled for alternative affordable housing. The Council may want to consider the practicality of this policy going forward given the definition of affordable homes in the NPPF 2021 and the introduction of first homes, particularly in relation to the need to lift restrictions before the subsidy can be recycled.
- 10 The fourth paragraph allows for a developer to provide a viability assessment where developer does not believe the criteria in the policy can be fully met viably. The HBF considers that this is an important part of the policy in line with the requirements of the NPPF and PPG. The HBF however, notes paragraph 5.62 of the justification text in

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<sup>3</sup> Paragraph 50 of NPPF 2012

<sup>4</sup> PPG ID: 23b-027-20190315

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Matters, Issues and Questions for the Examination (Phase 3)

relation to viability. Where the HBF has some concerns around how the section in relation to the Council seeking Homes and Communities Agency (now replaced by Homes England and Regulator of Social Housing) subsidy, and if this is not available seeking to make changes to tenure mix or type of units, would work in practice.

**1.6 Is the approach to OSFC a reasonable one?**

11 The HBF does not wish to respond to this question at this time.

**1.7 Will the alternative source of supply (in Policy GB4 make any material difference in terms of supply?**

12 The HBF considers this is a question for the Council, whilst it is possible that exception sites for affordable housing in the Green Belt may contribute some affordable homes, the HBF does not have the evidence to suggest that this would make any material difference in terms of supply.