

Foundation Housing: Housing Strategy Consultation

6th December 2023

- More affordable housing required, especially for 18-25 year olds: options for younger persons are limited and sometimes require a guarantor, and they may not have one
- Lack of smaller properties: 1 and 2 bedrooms
- Available social rented housing seems to be more skewed towards over-55 year olds, or has other restrictions, which also rules out younger persons
- Need for improved relationship with private landlords to enable more access to “affordable” PRS properties. Can Council provide more incentives to private landlords to entice them: e.g. improvement grants/energy efficiency grants
- Also improve awareness of private landlords of client groups, especially younger people. Debunk myths about being on benefits, won't pay etc. Most younger people in work, but having to depend on benefits (UC) as on low wage.
- Pets should be allowed on properties
- Direct payments to landlords should be the norm
- LHA rates need to be increased
- Length of time to process HB claims a concern in some locations: taking around 9 weeks, and increasing stress for clients, many of whom are vulnerable and in fear of landlord wanting to evict them for not paying rent
- Concerns over gatekeeping by some HB teams: wanting to see Private Support Plans, which are very personalised: Does this breach GDPR issues. HB teams should trust Foundation as key Council partner and not require such information.



JohnsonMowat

Planning & Development Consultants

Response to

North Yorkshire Housing Strategy

On behalf of

KCS Development Ltd

Land north of Skipton Road, Gargrave

27th November 2023



Contents

- 1. Introduction**
- 2. Response to the Housing Strategy**
- 3. Summary and Conclusion**



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Strategic Context

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- 2.8 The opportunities and aspirations section of the Housing Strategy neglects to appreciate the role that agents/ landowners/ consultants and developers have in the delivery of housing.
- 2.9 The Council should seek opportunities to work proactively with developers, alongside Registered Providers, to deliver market and affordable housing which meet a variety of needs. It is an error that there is little regard to the role developers have to play in housing delivery.



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YEW TREE ASSOCIATES

LAND, TOWN PLANNING &
DEVELOPMENT CONSULTANTS

Consultation Response to North Yorkshire Housing Strategy

On behalf of

KCS Development Ltd

In respect of

**Land North of
Gothic Farm
Back Lane
North Duffield
Selby**

27.11.23

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Registered in England & Wales company number 9221926.

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- 2.1 There is significant concern in relation to the period of time covered by the Housing Strategy. The document itself makes reference to the North Yorkshire Council Plan (2023-2027), Homes England Strategic Plan (2023-28) and the aspirations for housing over the next five years (2024 – 2029). None of these strategies align in relation to timescale. Notwithstanding this, a period of five years is not considered substantial enough to implement a strategy and allow for delivery and monitoring of outcomes.
- 2.2 It is anticipated that the Housing Strategy will inform the North Yorkshire Local Plan and therefore a strategy covering a longer time period, for example 2024 – 2040, would more appropriately align with the strategic aims of the County and allow time for delivery of housing and the assessment and appraisal of the effectiveness of the Strategy. It is noted there is no mention of any emerging North Yorkshire Local Plan within the Strategy. Given the intention to have a Local Plan adopted by 2028, the relationship between the Local Plan, housing requirement, affordable housing provision, housing distribution etc, and the Housing Strategy should be addressed within the document.

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- 2.5 Following the Covid-19 pandemic remote working remains common practice. Such working arrangements have contributed to an increase in relocations to more rural settlements from higher density city locations. This pattern of relocation has a number of benefits for the County including rebalancing ageing populations in rural settlements and providing economic growth through expenditure on rural services and facilities.
- 2.6 Furthermore, with regard to the ageing population, the role that adaptable homes can have in meeting this need is not addressed.
- 2.7 Market housing, and housing to attract economic growth, has a valuable part to play in addressing these challenges.

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- 2.9 The Council should seek opportunities to work proactively with developers, alongside Registered Providers, to deliver market and affordable housing which meet a variety of needs. It is an error that there is little regard to the role developers have to play in housing delivery. As currently drafted the Strategy is predominantly for the public sector and RSLs. There is a

strong link between market housing and private development and the delivery of affordable housing.

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2.10 The vision statement should be amended to read as follows:

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2.11 It is important that the vision includes an element of aspiration and growth. Simply meeting the ‘needs’ is too narrow and limiting, it would lead to only meeting a demand for certain house types and does not address the wider demand for housing. Addressing aspirations for housing growth would also assist in generating economic growth.

Our People

2.12 Under the subheading ‘Our People’ no comment is raised regarding the general priorities for the North Yorkshire population.

2.13 However, it is once again reiterated that the Council have not recognised the contribution that accessible and adaptable homes have towards meeting the needs of an ageing population and these can offer an alternative to extra care and specialist care provision. The role that developers have to play in the delivery of accessible and adaptable homes is missing from the text.

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2.16 Under the subheading ‘Our Places’, as drafted, we disagree with the three priorities.

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- 2.22 We note the priority intended to “*support communities through neighbourhood renewal and regeneration*”. It is respectfully stated that North Yorkshire is not a major area for ‘renewal’ although the existence of small pockets of deprivation, particularly in the Scarborough District, is not disputed. It is noted that the Strategy makes reference to significant regeneration projects within Selby including the new settlement at Heronby. New settlements at Maltkin and Ripon Barracks are also referenced.
- 2.23 The emerging Selby Local Plan is yet to be adopted indeed it may well be abandoned and, despite the intended timetable, has not yet been submitted for Examination. It is understood there is continued objection against the proposed new settlement at Heronby. Notwithstanding this, the concept of new settlements rarely works and the overall housing distribution is most effectively determined through the plan led system where housing allocations and areas of growth should be identified to meet the challenges of the County. Investigation of the potential of new settlements is best investigated outside of the Local Plan process rather than within it.
- 2.24 It is also noted that reference is made to the Cross Hill Lane site at Selby. It is respectfully stated that this site has encountered significant viability issues and should not be relied upon as a key component within the Housing Strategy.
- 2.25 The Housing Strategy fails to recognise some of the key constraints within North Yorkshire for the allocation and distribution of housing including keeping homes away from areas of high flood risk and sensitive landscape areas. In meeting these challenges the smaller settlements are obvious growth areas, benefitting from key services and facilities which can be sustained through proportionate growth, and housing growth which can assist in rebalancing an ageing population.
- Our Homes
- 2.26 It is noted that a key priority under the Our Homes subheading is to “*ensure that new housing supply of all tenures contributes to our net zero ambitions*”. It is respectfully stated that central government policy should remain the starting point in this regard and any requirements over and above should be appropriately tested for viability. It is agreed that the Future Homes Standard will contribute positively to aspirations towards net zero.

3.0 SUMMARY AND CONCLUSION

- 3.1 The consultation on the Housing Strategy is welcomed. There are significant concerns regarding the short time period the strategy covers, 2024- 2029. This should be a longer and more meaningful timeframe, for example to 2040, to tie into the emerging North Yorkshire Local Plan timescales. Furthermore, this would allow for a reasonable time period for implementation of the Strategy to allow delivery to come to fruition as a result. Such a short timescale does not allow for tangible analysis regarding the effectiveness of the Strategy.
- 3.2 The Strategy should include measurable goals and make provision for monitoring across the Strategy period.
- 3.3 The draft Strategy overlooks a number of key challenges which affect housing need, demand and delivery across the County. Most significantly these include:
- The increase in rural relocation as a result of increased remote working;
 - Loss of housing stock as a result of second home owner and Air B&B rentals;
 - Avoiding housing delivery in high flood risk and sensitive landscape areas;
 - Overreliance on housing delivery through new settlements rather than facilitating growth in sustainable smaller settlements.
- 3.4 Overall, the Strategy fails to recognise a number of key opportunities and delivery mechanisms to both boost housing delivery and economic growth including:
- The role of developers and market housing to increase rural expenditure;
 - The interrelationship between delivery of market and affordable housing;
 - The role that housing delivery can have in rebalancing the ageing population given the increase in remote working;
 - The role that second home ownership and Air B&Bs have in attracting rural expenditure, boosting rural tourism and facilitating economic growth;
 - Flexible approaches towards affordable housing delivery to allow financial investment in improving existing stock using monies generated from new housing delivery.
 - Emphasising the role that the plan making system has in contributing to housing delivery and encouragement of fostering relations between private developers, registered providers and the Council's Policy Officers to boost delivery.
- 3.5 We would welcome further and continued dialogues with the Council in relation to the Housing Strategy potentially through a series of planned & minuted forums.



Land at Station Road, Wistow

**KCS Development response to North Yorkshire Council
Housing Strategy consultation**

On behalf of **KCS Development Ltd**



Document Control Sheet

Project Name: Land at Station Road, Wistow

Project Ref: 31419

Report Title: Response to North Yorkshire Council Housing Strategy consultation

Doc Ref: 31419/001

Date: December 2023

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Approved by:	Stuart Natkus	Director	SN	11 / 12 / 2023
For and on behalf of Stantec UK Limited				

Revision	Date	Description	Prepared	Reviewed	Approved

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Appendices

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1 Introduction

- 1.1.1 This document responds to the North Yorkshire Housing Strategy Consultation, and is submitted on behalf of KCS Development Ltd ('KCS').
- 1.1.2 KCS has active interests across the North Yorkshire Council area and is actively promoting these interests. These representations are submitted in the context of land in Wistow.
- 1.1.3 The Housing Strategy is welcomed as an acknowledgement of the Council's responsibility to ensure continued housing delivery across the County. A North Yorkshire Local Plan is not expected to be adopted until 2028 however housing delivery across the County should not be delayed until this point and the Housing Strategy has an important role to play in the intervening years.
- 1.1.4 Concern is raised that there are no measurable goals set out within the Strategy, nor any monitoring measures across the Strategy period. Is it critical that the Strategy is effective, meaning monitoring and actionable items are essential, however such measures are seemingly omitted.

2 Response to the Housing Strategy consultation

2.1 Strategic Context

- 2.1.1 There is concern at the time period covered by the Housing Strategy. The document refers to the North Yorkshire Council Plan (2023-2027), Homes England Strategic Plan (2023-28) and aspirations for housing over the next five years (2024 – 2029). None of these strategies align in relation to timescales and delivery.
- 2.1.2 Notwithstanding this, a period of five years (for the Housing Strategy) is not considered substantial enough to implement a strategy and allow for delivery and monitoring of outcomes, particularly when the Housing Strategy will inform a Local Plan which has a 15+ year period.
- 2.1.3 The consultation document notes the Housing Strategy will inform the North Yorkshire Local Plan and therefore a strategy covering a longer time period, for example 2024 – 2040, would more appropriately align with the strategic aims of the County and allow time for delivery of housing and the assessment and appraisal of the effectiveness of the Strategy. It is noted there is no mention of any emerging North Yorkshire Local Plan within the Strategy. Given the intention to have a Local Plan adopted by 2028, the relationship between the Local Plan, housing requirement, affordable housing provision, housing distribution etc, and the Housing Strategy should be addressed within the document.

2.2 Challenges

- 2.2.1 The challenges to housing within North Yorkshire, as set out on page 2, are noted. However, it is considered that a number of key challenges, and the opportunities they present, within the County have been omitted.
- 2.2.2 In recent years there has been a rise in second holiday homes and Air B&Bs resulting in a loss of market housing stock to tourism. The positive economic effect within the County, where many of the former districts rely on tourism for economic growth and job creation, should not be underestimated. The housing strategy should look to boost the market and affordable housing stock having regard to second home ownership.
- 2.2.3 Following the Covid-19 pandemic remote working remains common practice. Such working arrangements have contributed to an increase in relocations to more rural settlements from higher density city locations. This pattern of relocation has a number of benefits for the County including rebalancing ageing populations in rural settlements and providing economic growth through expenditure on rural services and facilities.
- 2.2.4 Furthermore, with regard to the ageing population, the role that adaptable homes can have in meeting this need is not addressed.
- 2.2.5 Market housing, and housing to attract economic growth, has a valuable part to play in addressing these challenges.

2.3 Opportunities and Aspirations

- 2.3.1 The opportunities and aspirations section of the Housing Strategy neglects to appreciate the role that agents/ landowners/ consultants and developers have in the delivery of housing.

2.3.2 The Council should seek opportunities to work proactively with developers, alongside Registered Providers, to deliver market and affordable housing which meet a variety of needs. It is an error that there is little regard to the role developers have to play in housing delivery. The Draft Strategy is predominantly for the public sector and RSLs. There is a strong link between market housing and private development and the delivery of affordable housing.

2.4 Vision

2.4.1 The vision statement should be amended to read as follows:

“Our vision is to delivery good quality, sustainable and affordable homes that meet the needs and aspirations of our communities”.

2.4.2 It is important that the vision includes an element of aspiration and growth. Simply meeting the ‘needs’ is too narrow and limiting, it would lead to only meeting a demand for certain house types and does not address the wider demand for housing. Addressing aspirations for housing growth would also assist in generating economic growth.

2.5 Our People

2.5.1 Under the subheading ‘Our People’ no comment is raised regarding the general priorities for the North Yorkshire population.

2.5.2 However, the Council have not recognised the contribution that accessible and adaptable homes have towards meeting the needs of an ageing population and these can offer an alternative to extra care and specialist care provision. The role that developers have to play in the delivery of accessible and adaptable homes is missing from the text.

2.5.3 Furthermore, under the subheading “*we will meet these challenges by*” at section 3.2 of the Strategy it is advised that an additional bullet point is provided which reads:

- *‘Work with the Planning Policy Team to identify new opportunities for sites in the Local Plan.’*

2.5.4 Again, the importance of the emerging Local Plan and its role in relation to the delivery of housing has been omitted from the Strategy.

2.6 Our Places

2.6.1 Under the subheading ‘Our Places’, as drafted, we disagree with the three priorities.

2.6.2 Whilst importance of affordable housing delivery is not disputed the priority of “*Growing the supply of affordable and available housing*” does not specifically address the requirement for market and affordable housing to meet both need and demand.

2.6.3 It is noted that there is a recognition that “*we need to increase the supply of affordable housing*” however the role that the identification of housing allocations within a Local Plan process has to facilitate this and working with Developers to boost delivery is again omitted from the Housing Strategy.

2.6.4 In discussing the delivery of affordable housing there is no consideration of alternative ways of using the economic benefits of market housing delivery. Onsite delivery of affordable housing

may not always be the most appropriate delivery mechanism and instead a flexible approach should be considered to allow for smarter ways of using potential capital receipts for example using financial contributions from developments to invest in existing stock identified as poor quality. The emerging Local Plan should seek to build in this flexibility.

- 2.6.5 Consideration should be had to affordable dwelling Transfers Values. This is currently omitted from the Strategy.
- 2.6.6 The Strategy seeks to deliver “*at least 2,537 new homes per year across all tenures, including a minimum of 802 new affordable homes each year*”. No detail is provided which evidences how these figures have been derived. The background data should be made available.
- 2.6.7 We note the priority intended to “*support communities through neighbourhood renewal and regeneration*”. It is respectfully stated that North Yorkshire is not a major area for ‘renewal’ although the existence of small pockets of deprivation, particularly in the former Scarborough District, is not disputed. It is noted that the Strategy refers to significant regeneration projects within Selby including the new settlement at Heronby. New settlements at Maltkin (Harrogate) and Ripon Barracks are also referenced.
- 2.6.8 The emerging Selby Local Plan is yet to be adopted indeed it may well be abandoned and, despite the intended timetable, has not yet been submitted for Examination. There is continued objection (including from local stakeholders and statutory consultees) to the proposed new settlement at Heronby. New settlements are very challenging to deliver, and the overall housing distribution is most effectively determined through the plan led system where housing allocations and areas of growth should be identified to meet the challenges of the County along with other allocations.
- 2.6.9 It is also noted that reference is made to the Cross Hill Lane site at Selby. It is respectfully stated that this site has encountered significant viability issues and should not be relied upon as a key component within the Housing Strategy.
- 2.6.10 The Housing Strategy fails to recognise key constraints in North Yorkshire for allocation and distribution of housing, including avoiding areas of high flood risk and sensitive landscape areas. In meeting these challenges smaller settlements should also be growth areas, benefitting from key services and facilities which can be sustained through proportionate growth, and housing growth which can assist in rebalancing an ageing population.

2.7 Our Homes

- 2.7.1 It is noted that a key priority under the Our Homes subheading is to “*ensure that new housing supply of all tenures contributes to our net zero ambitions*”. It is respectfully stated that central government policy should remain the starting point in this regard and any requirements over and above should be appropriately tested for viability. It is agreed that the Future Homes Standard will contribute positively to aspirations towards net zero.

3 Conclusions

- 3.1.1 This response to the North Yorkshire Housing Strategy Consultation is submitted on behalf of KCS Development Ltd ('KCS'). KCS has active interests across the Council area and is actively promoting these interests. These representations are submitted in the context of KCS's interests in Wistow.
- 3.1.2 The consultation on the Housing Strategy is welcomed. However, there are concerns regarding the short time period the strategy covers (2024- 2029) when housing strategies can take a number of years to implement and mature.
- 3.1.3 The Strategy should set a longer and more meaningful timeframe, for example to 2040, to tie into the emerging North Yorkshire Local Plan. This would allow for a reasonable time period for implementation of the Strategy and allow delivery to come to fruition as a result. Such a short timescale does not allow for tangible analysis of Strategy effectiveness. The Strategy should include measurable goals and make provision for monitoring.
- 3.1.4 The draft Strategy overlooks a number of key challenges which affect housing need, demand, and delivery across the County. Most significantly these include:
- The increase in rural relocation as a result of increased home/remote working;
 - Loss of housing stock as a result of second homeowner and Air B&B rentals;
 - Avoiding housing delivery in high flood risk and sensitive landscape areas;
 - Reliance on Heronby as a new settlement with questionable deliverability, instead of considering the existing well-advanced new settlements (e.g., Maltkiln) as well as growth in sustainable smaller settlements.
- 3.1.5 The Strategy fails to recognise a number of key opportunities and delivery mechanisms to both boost housing delivery and economic growth including the:
- Role of developers and market housing to increase urban and rural expenditure;
 - Interrelationship between delivery of market and affordable housing;
 - Role that housing delivery can have in rebalancing the ageing population given the increase in remote working;
 - Role that second home ownership and Air B&Bs have in attracting rural expenditure, boosting rural tourism and facilitating economic growth;
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 - Role the plan making system has in housing delivery and encouragement of fostering relations between developers, registered providers and the Council boost delivery.
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JohnsonMowat

Planning & Development Consultants

Response to

North Yorkshire Housing Strategy

On behalf of

KCS Development Ltd

Land at Muston Road, Filey

27th November 2023



Contents

- 1. Introduction**
- 2. Response to the Housing Strategy**
- 3. Summary and Conclusion**



1.0 INTRODUCTION

- 1.1 Thank you for providing the opportunity to respond to the North Yorkshire Housing Strategy Consultation. This representation is made on behalf of KCS Development Ltd and their land interest at Land at Muston Road, Filey.
- 1.2 The Housing Strategy is welcomed as an acknowledgement of the Council's responsibility to ensure continued housing delivery across the County. A North Yorkshire Local Plan is not expected to be adopted until 2028 however housing delivery across the County should not be delayed until this point and the Housing Strategy has an important role to play in the intervening years.
- 1.3 Concern is raised that there are no measurable goals set out within the Strategy, nor any monitoring measures across the Strategy period. How is its effectiveness to be considered?



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- 2.1 There is significant concern in relation to the period of time covered by the Housing Strategy. The document itself makes reference to the North Yorkshire Council Plan (2023-2027), Homes England Strategic Plan (2023-28) and the aspirations for housing over the next five years (2024 – 2029). None of these strategies align in relation to timescale. Notwithstanding this, a period of five years is not considered substantial enough to implement a strategy and allow for delivery and monitoring of outcomes.
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3.0 SUMMARY AND CONCLUSION

- 3.1 The consultation on the Housing Strategy is welcomed. There are significant concerns regarding the short time period the strategy covers, 2024- 2029. This should be a longer and more meaningful timeframe, for example to 2040, to tie into the emerging North Yorkshire Local Plan timescales. Furthermore, this would allow for a reasonable time period for implementation of the Strategy to allow delivery to come to fruition as a result. Such a short timescale does not allow for tangible analysis regarding the effectiveness of the Strategy.
- 3.2 The Strategy should include measurable goals and make provision for monitoring across the Strategy period.
- 3.3 The draft Strategy overlooks a number of key challenges which affect housing need, demand and delivery across the County. Most significantly these include:
- The increase in rural relocation as a result of increased remote working;
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- 3.4 Overall, the Strategy fails to recognise a number of key opportunities and delivery mechanisms to both boost housing delivery and economic growth including:
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 - The interrelationship between delivery of market and affordable housing;
 - The role that housing delivery can have in rebalancing the ageing population given the increase in remote working;
 - The role that second home ownership and Air B&Bs have in attracting rural expenditure, boosting rural tourism and facilitating economic growth;
 - Flexible approaches towards affordable housing delivery to allow financial investment in improving existing stock using monies generated from new housing delivery.
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JohnsonMowat

Planning & Development Consultants

Response to

North Yorkshire Housing Strategy

On behalf of

KCS Development Ltd

**Land off Racecourse Road, Phase 2, East
Ayton**

27th November 2023



Contents

- 1. Introduction**
- 2. Response to the Housing Strategy**
- 3. Summary and Conclusion**



1.0 INTRODUCTION

- 1.1 Thank you for providing the opportunity to respond to the North Yorkshire Housing Strategy Consultation. This representation is made on behalf of KCS Development Ltd and their land interest at Land off Racecourse Road, Phase 2, East Ayton.
- 1.2 The Housing Strategy is welcomed as an acknowledgement of the Council's responsibility to ensure continued housing delivery across the County. A North Yorkshire Local Plan is not expected to be adopted until 2028 however housing delivery across the County should not be delayed until this point and the Housing Strategy has an important role to play in the intervening years.
- 1.3 Concern is raised that there are no measurable goals set out within the Strategy, nor any monitoring measures across the Strategy period. How is its effectiveness to be considered?



2.0 RESPONSE TO THE HOUSING STRATEGY

Strategic Context

- 2.1 There is significant concern in relation to the period of time covered by the Housing Strategy. The document itself makes reference to the North Yorkshire Council Plan (2023-2027), Homes England Strategic Plan (2023-28) and the aspirations for housing over the next five years (2024 – 2029). None of these strategies align in relation to timescale. Notwithstanding this, a period of five years is not considered substantial enough to implement a strategy and allow for delivery and monitoring of outcomes.
- 2.2 It is anticipated that the Housing Strategy will inform the North Yorkshire Local Plan and therefore a strategy covering a longer time period, for example 2024 – 2040, would more appropriately align with the strategic aims of the County and allow time for delivery of housing and the assessment and appraisal of the effectiveness of the Strategy. It is noted there is no mention of any emerging North Yorkshire Local Plan within the Strategy. Given the intention to have a Local Plan adopted by 2028, the relationship between the Local Plan, housing requirement, affordable housing provision, housing distribution etc, and the Housing Strategy should be addressed within the document.

Challenges

- 2.3 The challenges to housing within North Yorkshire, as set out on page 2, are noted. However, it is considered that a number of key challenges, and the opportunities they present, within the County have been omitted.
- 2.4 In recent years there has been a rise in second holiday homes and Air B&Bs resulting in a loss of market housing stock to tourism. The positive economic effect within the County, where many of the former districts rely on tourism for economic growth and job creation, should not be underestimated. The housing strategy should look to boost the market and affordable housing stock having regard to second home ownership.
- 2.5 Following the Covid-19 pandemic remote working remains common practice. Such working arrangements have contributed to an increase in relocations to more rural settlements from higher density city locations. This pattern of relocation has a number of benefits for the County including rebalancing ageing populations in rural settlements and providing economic growth through expenditure on rural services and facilities.
- 2.6 Furthermore, with regard to the ageing population, the role that adaptable homes can have in meeting this need is not addressed.
- 2.7 Market housing, and housing to attract economic growth, has a valuable part to play in addressing these challenges.

Opportunities and Aspirations

- 2.8 The opportunities and aspirations section of the Housing Strategy neglects to appreciate the role that agents/ landowners/ consultants and developers have in the delivery of housing.
- 2.9 The Council should seek opportunities to work proactively with developers, alongside Registered Providers, to deliver market and affordable housing which meet a variety of needs. It is an error that there is little regard to the role developers have to play in housing delivery.



As currently drafted the Strategy is predominantly for the public sector and RSLs. There is a strong link between market housing and private development and the delivery of affordable housing.

Vision

2.10 The vision statement should be amended to read as follows:

“Our vision is to delivery good quality, sustainable and affordable homes that meet the needs and aspirations of our communities”.

2.11 It is important that the vision includes an element of aspiration and growth. Simply meeting the ‘needs’ is too narrow and limiting, it would lead to only meeting a demand for certain house types and does not address the wider demand for housing. Addressing aspirations for housing growth would also assist in generating economic growth.

Our People

2.12 Under the subheading ‘Our People’ no comment is raised regarding the general priorities for the North Yorkshire population.

2.13 However, it is once again reiterated that the Council have not recognised the contribution that accessible and adaptable homes have towards meeting the needs of an ageing population and these can offer an alternative to extra care and specialist care provision. The role that developers have to play in the delivery of accessible and adaptable homes is missing from the text.

2.14 Furthermore, under the sub heading “we will meet these challenges by” at section 3.2 of the Strategy it is advised that an additional bullet point is provided which reads:

- Work with the Planning Policy Team to identify new opportunities for sites in the Local Plan.

2.15 Again, the importance of the emerging Local Plan and its role in relation to the delivery of housing has been omitted from the Strategy.

Our Places

2.16 Under the subheading ‘Our Places’, as drafted, we disagree with the three priorities.

2.17 Whilst importance of affordable housing delivery is not disputed the priority of “*Growing the supply of affordable and available housing*” does not specifically address the requirement for market and affordable housing to meet both need and demand.

2.18 It is noted that there is a recognition that “*we need to increase the supply of affordable housing*” however the role that the identification of housing allocations within a Local Plan process has to facilitate this and working with Developers to boost delivery is again omitted from the Housing Strategy.

2.19 In discussing the delivery of affordable housing there is no consideration of alternative ways of using the economic benefits of market housing delivery. Onsite delivery of affordable housing may not always be the most appropriate delivery mechanism and instead a flexible approach should be considered to allow for smarter ways of using potential capital receipts



for example using financial contributions from developments to invest in existing stock identified as poor quality. The emerging Local Plan should seek to build in this flexibility.

- 2.20 Consideration should be had to affordable dwelling Transfers Values. This is currently omitted from the Strategy.
- 2.21 The Strategy seeks to deliver “*at least 2,537 new homes per year across all tenures, including a minimum of 802 new affordable homes each year*”. No detail is provided which evidences how these figures have been derived. The background data should be made available.
- 2.22 We note the priority intended to “*support communities through neighbourhood renewal and regeneration*”. It is respectfully stated that North Yorkshire is not a major area for ‘renewal’ although the existence of small pockets of deprivation, particularly in the Scarborough District, is not disputed. It is noted that the Strategy makes reference to significant regeneration projects within Selby including the new settlement at Heronby. New settlements at Maltkin and Ripon Barracks are also referenced.
- 2.23 The emerging Selby Local Plan is yet to be adopted indeed it may well be abandoned and, despite the intended timetable, has not yet been submitted for Examination. Johnson Mowat is aware of continued objection against the proposed new settlement at Heronby. Notwithstanding this, the concept of new settlements rarely works and the overall housing distribution is most effectively determined through the plan led system where housing allocations and areas of growth should be identified to meet the challenges of the County. Investigation of the potential of new settlements is best investigated outside of the Local Plan process rather than within it.
- 2.24 It is also noted that reference is made to the Cross Hill Lane site at Selby. It is respectfully stated that this site has encountered significant viability issues and should not be relied upon as a key component within the Housing Strategy.
- 2.25 The Housing Strategy fails to recognise some of the key constraints within North Yorkshire for the allocation and distribution of housing including keeping homes away from areas of high flood risk and sensitive landscape areas. In meeting these challenges the smaller settlements are obvious growth areas, benefitting from key services and facilities which can be sustained through proportionate growth, and housing growth which can assist in rebalancing an ageing population.

Our Homes

- 2.26 It is noted that a key priority under the Our Homes subheading is to “*ensure that new housing supply of all tenures contributes to our net zero ambitions*”. It is respectfully stated that central government policy should remain the starting point in this regard and any requirements over and above should be appropriately tested for viability. It is agreed that the Future Homes Standard will contribute positively to aspirations towards net zero.



3.0 SUMMARY AND CONCLUSION

- 3.1 The consultation on the Housing Strategy is welcomed. There are significant concerns regarding the short time period the strategy covers, 2024- 2029. This should be a longer and more meaningful timeframe, for example to 2040, to tie into the emerging North Yorkshire Local Plan timescales. Furthermore, this would allow for a reasonable time period for implementation of the Strategy to allow delivery to come to fruition as a result. Such a short timescale does not allow for tangible analysis regarding the effectiveness of the Strategy.
- 3.2 The Strategy should include measurable goals and make provision for monitoring across the Strategy period.
- 3.3 The draft Strategy overlooks a number of key challenges which affect housing need, demand and delivery across the County. Most significantly these include:
- The increase in rural relocation as a result of increased remote working;
 - Loss of housing stock as a result of second home owner and Air B&B rentals;
 - Avoiding housing delivery in high flood risk and sensitive landscape areas;
 - Overreliance on housing delivery through new settlements rather than facilitating growth in sustainable smaller settlements.
- 3.4 Overall, the Strategy fails to recognise a number of key opportunities and delivery mechanisms to both boost housing delivery and economic growth including:
- The role of developers and market housing to increase rural expenditure;
 - The interrelationship between delivery of market and affordable housing;
 - The role that housing delivery can have in rebalancing the ageing population given the increase in remote working;
 - The role that second home ownership and Air B&Bs have in attracting rural expenditure, boosting rural tourism and facilitating economic growth;
 - Flexible approaches towards affordable housing delivery to allow financial investment in improving existing stock using monies generated from new housing delivery.
 - Emphasising the role that the plan making system has in contributing to housing delivery and encouragement of fostering relations between private developers, registered providers and the Council's Policy Officers to boost delivery.
- 3.5 We would welcome further and continued dialogues with the Council in relation to the Housing Strategy potentially through a series of planned & minuted forums.

North Yorkshire County Council – Strategic Housing Consultation

Response by Kirk Hammerton Parish Council

Very little work seems to have gone into producing the consultation document. More substance is needed before it could genuinely be described as a strategy. As currently drafted it has the feel of a set of aspirations but without any clear description of why these things are needed or, more importantly, how they will be delivered. This is a wish-list, not a strategy.

Any housing strategy should begin by identifying what the housing need is in the area covered by the strategy and where those houses are required. There is no evidence of any work having been done on this. Instead, the total requirement (some 2,500 houses per annum) just seems to be an aggregate of the targets previously set by each of the District Borough Councils. These have been adopted without questioning or interrogating the figures, even though in many cases these figures have been around for a while and require updating (something the previous authorities might well have taken forward if they had not been abolished). The first step should therefore be to give proper consideration to the housing need of the county.

For example, in section 4 the document explains that Selby is currently the area of the whole country with the highest percentage population growth. A valid point, so why doesn't the strategy for housing take account of this and make Selby the top priority for new housing?

The document also explains that house prices in Harrogate are now 13 x average income and rightly identifies this as a concern (it being one of the highest multiples outside the usual South-East hotspots). There is an obvious need for significantly cheaper housing in that area. Yet there is no indication of how that problem will be addressed. Since this multiple has increased by some 30% under the housing policies adopted by Harrogate BC, following one of the most intensive housebuilding campaigns the area has ever seen, one might have expected a meaningful strategic document to be exploring what policy changes are needed. Instead, there is no indication of any change to policy. NYC will simply press ahead with more developments like Maltkiln which, in view of the constraints that scheme now faces, is most unlikely to deliver the 30%-40% affordable housing target currently mandated, if the developer is to make a profit. NYC's analysis suggests we need schemes like that in Selby, not Harrogate.

The "Strategy" will be to create more affordable housing. Yes, we understand the need for this, just as we have understood that need for the last decade or two. Nobody is going to challenge that, as an aspiration. What residents of North Yorkshire need to understand is how this new authority will deliver on this ambition, when its predecessors, faced with similar background pressures, were unable to do so.

There will be a strategy to deliver more eco-friendly construction. Again, few would disagree with this as an objective, but the problem is that it costs money. The environmental and green-energy standards which developers are expected to comply with in the approach to net zero are challenging and costly. KHPC is not suggesting these standards should be relaxed, but it does make it more difficult to deliver affordable homes. It is hard to see NYC's housing strategy being successful unless it makes at least an attempt to address these conflicting priorities and consider what the way forward might be. It seems unlikely that NYC itself will be able to offer subsidies to support developments as it is already facing a significant deficit, despite the cost savings we were assured would result from the creation of a unitary authority. Better to address these issues now rather than just keep kicking the can down the road, as has happened in the past.

We could respond in more detail on this document, but it would not achieve much as there's so little substance to comment on. May we respectfully suggest that NYC scraps this document, puts in some effort, and comes up with something that includes more analysis and strategy but less froth, which can then be put to residents for a meaningful response.

KIRK HAMMERTON PARISH COUNCIL

November 2023

Councillor Myers

I am writing on behalf of the Directors of Knaresborough Community Land Trust (KCLT) with comment on the draft housing strategy for North Yorkshire Council. KCLT has worked very hard over recent years, including during the disruption caused by COVID, to arrive at a position where we have secured our first property. This has been achieved through the compulsory purchase of a property by the former Harrogate Borough Council as part of their empty homes strategy. We are keen to play our local part in realising the benefits that community led housing can bring to our own Town and District and wish to give feedback on the consultation that chimes with our experience and ambition.

- Whilst there is a welcome indicator in section 7.2 that mentions community led housing we are disappointed the body of the document makes little reference to this important contribution to the implementation of the strategy. We therefore urge you to set out in more detail how you see **the contribution of community led housing** in the context of the wider plan.
- Whilst recognising that there is flesh to come on the bone we would like to see **far more tangible targets and baseline information** against which to judge the success of the strategy, particularly in the contribution that community led housing can make.
- Having benefitted from a well-developed **empty homes strategy** under the former Harrogate Borough Council we would urge that this good practice is built on and remains an important part of the strategy. We therefore welcome the proposals to bring long term empty properties back into use and would encourage **a proactive approach to compulsory purchase** and the appropriate level of **officer resource** be allocated to this important area.
- Recognising that delivering on this strategy will take time, and not wishing in any way to dampen commitments to short term measures to progress the strategy, we would welcome any insight into the sustainability and **needs over a longer period**, perhaps through to the early/mid-2030's. Forecasting housing needs into the future is recognised as being challenging but does not excuse setting such a long-term vision based on assessed needs, something that will also hopefully align more closely with the development of the North Yorkshire Local Plan as well as, for Knaresborough, their recently adopted Neighbourhood Plan.
- Whilst we recognise the importance to NYC of rural housing needs (including in some of the Villages as part of the Knaresborough District) we would not want to see this progressed at the expense of the great need for making progress in **urban/market town settings**. A full assessment of needs and the balance of required action between sparse rural, rural and urban settings for potentially different or nuanced strategic solutions could therefore enhance the strategy.
- Whilst recognising the growing needs for housing amongst those who are ageing we have identified a local need for affordable housing amongst the young adult population. Being priced out of some locations results either in risks of homelessness or the disappearance of a vital demographic for economic prosperity that young, often single, adults can provide. The lack of a proactive approach in this area only serves to emphasise the ageing demographic as young people leave North Yorkshire for more affordable housing solutions elsewhere. We therefore urge that due consideration is made to **the needs of young adults for affordable housing** in market towns like Knaresborough.
- In the context of the NYC review of assets we would strongly suggest that where community led housing solutions have the potential to bring **new life to existing NYC assets** with respect to housing needs that this be given priority.

We recognise the vital importance of political leadership for realising our vision for the growth of community led housing solutions and welcome the opportunities that the creation of North Yorkshire Council provides in this respect. We look forward to working with the Council in making our own contribution to delivering on the Housing Strategy for the benefit of the people of Knaresborough.

Regards



Knaresborough Community Land Trust (on behalf of the Directors)

North Yorkshire Housing Strategy Consultation

Intro: As part of Local Government Reorganisation, the Council is now responsible for the delivery of the full range of housing services across the county. To meet the diverse housing needs of North Yorkshire and deliver the housing services to meet those needs, the Council will need to have in place a Housing Strategy. The Housing Strategy will set the objectives, targets, and policies for how the Council will manage and deliver its housing service over the next few years.

A Housing Strategy has been drafted, outlining the Council's aims and ambitions for housing from 2024 to 2029. The Strategy sets out the Council's vision for housing action and investment across three key themes: People, Places, and Homes.

We are now seeking feedback on the draft strategy, to ensure that it accurately reflects the ambitions and priorities of communities across North Yorkshire.

Standard notices: privacy, accessibility etc.

Q1. Please indicate in which capacity you are responding to this consultation:

- North Yorkshire Resident
- North Yorkshire Business Owner
- North Yorkshire Council Ward Councillor/ Elected Member
- North Yorkshire Council Employee
- North Yorkshire Council Tenant
- Registered Provider
- Housing Developer
- Voluntary and Community Sector Representative
- Public Sector Body
- Other

Vision: The draft strategy proposes the following vision for North Yorkshire:

Our vision is to deliver good quality, affordable and sustainable homes that meet the needs of all our communities

Q2. To what extent do you agree or disagree with the vision statement?

Strongly Agree Agree Neither Agree nor Disagree Disagree Strongly Disagree

Do you have any comments on the strategy's vision?

Q3. Which Locality do you live in?

- Craven,
- Hambleton,
- Harrogate,

- Richmondshire,
- Ryedale,
- Scarborough,
- Selby,
- Outside of NY
- Prefer not to say

Q4. Which age group do you belong to?

Q5. Do you consider yourself to have a disability or a long-term limiting condition? YES/NO/PREFER NOT TO SAY

People

“Our People” is about meeting the housing needs of our population and particularly our vulnerable households. This includes older households, homeless households, those threatened with homelessness and households with support needs. It also includes specific groups such as Gypsies and Travellers and Refugees and Asylum Seekers.

Our key priorities for this theme are:

- Preventing and Tackling Homelessness
- Meeting the needs of our ageing population
- Meeting Supported Housing Needs and specific groups

Q6. To what extent do you agree or disagree that we have the correct priorities for the people theme?

Strongly Agree Agree Neither Agree nor Disagree Disagree Strongly Disagree

Do you have any comments on the priorities we have selected?

Places

Our Places is about our towns, villages, and neighbourhoods; what are they like; what are the housing market challenges and how do we address those challenges.

Our key priorities for this theme are:

- Growing the supply of affordable and available housing
- Addressing the rural housing crisis
- Supporting communities through neighbourhood renewal and regeneration

Q7. To what extent do you agree or disagree that we have the correct priorities for the places theme?

Strongly Agree Agree Neither Agree nor Disagree Disagree Strongly Disagree

Do you have any comments on the priorities we have selected?

In addition to the three priorities listed, this Parish Council believes that in order to address all of the priorities already listed, an overarching strategy should include a target to reduce the numbers of short-term lets and second home ownership.

Q8. Which best describes your current housing tenure?

- Own a home (outright)
- Own a home (with a mortgage)
- Rent from a private landlord or family member
- Rent from a council/housing association
- Other
- Prefer not to say

Homes

Our Homes is about the challenges with our housing stock and how we can improve housing to ensure it is decent and affordable. We face huge challenges in ensuring our existing homes are decent, energy efficient and can contribute to meeting our wider Climate Change aspirations. We also need to ensure that all new build housing meets the highest standards and actively contributes to meeting our Climate Change aspirations

Our key priorities for this theme are:

- Decarbonising the whole housing stock, including our Council housing stock, making homes more energy efficient and affordable to live in, reducing fuel poverty
- Ensuring that new housing supply of all tenures contributes to our net zero ambitions
- Addressing stock condition issues, improving poor quality housing in all tenures
- Ensuring that our Council housing stock remains decent and continues to improve

Q9. To what extent do you agree or disagree that we have the correct priorities for the homes theme?

Strongly Agree Agree Neither Agree nor Disagree Disagree Strongly Disagree

Do you have any comments on the priorities we have selected?

Q10. Do you have any other comments on the draft housing strategy? Free Text: (1000 words max)

The proportion of new-build housing anticipated to be affordable is less than a third, this must increase.

There must be robust planning conditions attached to planning applications that are adhered to, without amendment, to ensure the appropriate amount of affordable housing is delivered.

Introduce mandatory licensing for all short-term holiday lets, and ensure that a robust and thorough needs analysis is carried out prior to granting any licenses.

With rising homelessness in the wider area and cost/price squeeze, the focus should move away from more high-end housing – especially in low income/high house price areas. A propensity of holiday lets prevent many from owning their own homes and decreases availability for them of rental choice.

There is only a cursory mention of the private-rented sector. In this Parish, a lot of people rent, via private landlords, many of whom operate short-term holiday let businesses with significant financial returns. This leads to a supply shortage for residential use, drives up housing prices and gives landlords a significant and unhealthy degree of control over the market and ultimately leads to destruction of communities.

Any housing strategy, particularly in this Parish, should incorporate measures and incentives to encourage landlords to move out of the short-term holiday let business and into the private rental market for long-term tenancies that would increase availability for local people.

Increase council, or other taxation to generate income that would contribute to the local economy and housing stock.

Equalities Monitoring

Q11. Are you ...

- Male
- Female
- I describe myself another way
- Prefer not to say

Q12. What is your ethnic background?

- White – English/Welsh/Scottish/Northern Irish/British/Irish
- Asian/Asian British (Indian, Pakistani, Chinese and other)
- Mixed/Multiple ethnic groups
- Other ethnic group
- Black/African/Caribbean/Black British
- Prefer not to answer

Q13.

Thank you for taking the time to complete this consultation form.

Ramillies Building, 1st Floor,

Marlborough Lines,

Monxton Road,

Andover,

Hants,

SP11 8HJ

Telephone:

Email:

File reference:081223NYCHousing

08 December 2023

Copy to: housingconsult@northyorks.gov.uk

Dear North Yorkshire Council Planning Services,

North Yorkshire Council (NYC): Draft Housing Strategy Consultation

The Defence Infrastructure Organisations (DIO) write on behalf of the Secretary of State of Defence (SSOD) on the above consultation.

The DIO is the estate expert for defence, supporting the armed forces to enable military capability by planning, building, maintaining, and servicing infrastructure.

The DIO are also responsible for the Ministry of Defence's (MOD) Defence Estate Optimisation programme (DEOP), which includes the disposal of assets and land, that are no longer required for military purposes, alongside the reprovision of ongoing requirements to support and enhance MOD's retained sites. This includes land at Catterick Garrison and the Ripon Barracks sites (Claro & Deverell Barracks and Laverbanks Training Area), both of which benefit from allocations within their respective local plans¹ and live planning applications, pending consideration with North Yorkshire Council (NYC). Importantly, the consultation recognises the importance of such regeneration projects being catalysts for not just the delivery of housing, but generating economic growth, alongside key infrastructure improvements that will benefit the whole of North Yorkshire. This position is welcomed.

The purpose of this representation is to outline our initial support for the draft housing strategy for North Yorkshire, and the role that DIO/MOD can play as a 'partner' to help deliver housing supply. This includes housing for military personnel, but also the general public of North Yorkshire, through the development of MOD land that is surplus to operational requirements.

Finally, DIO welcome the opportunity for continued engagement with NYC on this housing strategy, alongside the preparation of a New Local Plan for the North Yorkshire area.

¹ Richmondshire Local Plan (2014) and Harrogate Borough Local Plan (2022)

2 of 2

Yours sincerely,

OFFICIAL

Deputy Head Estates - Acquisition & Disposal

44. **Draft Housing Strategy for North Yorkshire**

Considered –

A presentation by Sharon Graham, Housing Strategy Manager, concerning the draft Housing Strategy for North Yorkshire.

[Here](#) is the presentation, together with [a link](#) to the draft strategy itself.

Sharon Graham, Housing Strategy Manager, in the Community Services Directorate, highlighted the following:-

- The Strategy will help set the strategic direction for the new Council.
- Key challenges include an ageing population (25% of whom are aged 65 or above) and a reduction in the working age population (down by 2.6%)
- Affordability of housing is also an issue, with a reduction in incomes and an increase in property prices threatening to create a *perfect storm*.
- Fuel poverty is another key challenge. For example how to retrofit properties to ensure that the people who live in them are warm and well.
- There are a number of opportunities and aspirations. These include:-
 - Partnering with the new Mayor and Combined Authority to deliver growth
 - Working with York and North Yorkshire Housing Partnership to deliver shared goals
 - Being carbon neutral by 20234
 - Making the best use of resources
- The vision of the Strategy is *To deliver good quality, affordable and sustainable homes that meet the needs of all of our communities*
- To achieve this, the Directorate will work across three themes:_
 - Our people (for example, preventing and tackling homelessness)
 - Our places (for example, addressing the rural housing crisis)
 - Our homes (for example, ensuring that new housing supply contributes to our net zero housing ambitions)
- Consultation runs until 11th December 2023 and the aim is to adopt the Strategy in May 2024.

Councillor Simon Myers, Executive Member for Culture, Arts and Housing, remarked that there is a real enthusiasm in the new North Yorkshire Council to tackle issues. Housing can have an impact on inequality. Therefore, it is important we do what we can to address these inequalities.

He added that people are finding it difficult to keep warm and care workers cannot afford to live in North Yorkshire. The Council intend to use all of the tools at its disposal. He thanked, in particular, Nic Harne, Corporate Director for Community Development, Andrew Rowe, Assistant Director of Housing and Sharon Graham for the hard work that has gone into the Strategy.

Nic Harne commented that North Yorkshire Council provides a single authority for people to talk to and that Housing will *move the dial* on health outcomes. It may be worth being more explicit about including health in the vision or early on in the document.

The Chair asked if the Directorate was looking for the Board to contribute to this Strategy and the Local Plan. Nic Harne confirmed this is the case. The Local Plan is about place and this draft Housing Strategy is about homes at a targeted level.

Wendy Balmain advised that discussions are taking place at a tactical level between the Community Services Directorate and the Integrated Care Board. These relate to two key aspects:-

- a. How do we attract and retain key workers?
- b. A review of the primary Care estate. Much of the accommodation is based in residential-style accommodation which is past its sell by date and which is not conducive to integrated care.

Richard Webb felt that Local Government Reorganisation has provided an opportunity to work across Health and Social Care with Housing. Nic and his Team have been receptive and come up with tangible improvements. Health and Adult Service had recently been visited by the Older People's Housing Task Force and had had a productive discussion with them.

Richard Webb also mentioned that on 6th December 2023 there will be an online International Recruitment Session. If any colleagues would like to attend, please let him know.

Resolved –

That the draft Housing Strategy for North Yorkshire be noted.

North York Moors National Park Authority

Planning Committee

Date 30 November 2023

Item 8, North Yorkshire Council Housing Strategy

1. Purpose of the report

- 1.1 To report to Members the draft North Yorkshire Council Housing Strategy and agree the consultation response to be made by the Authority.

2. Background

- 2.1 On 1 April 2023 North Yorkshire County Council and the seven district/borough councils reorganised into North Yorkshire Council.
- 2.2 As a single Housing Authority, the Council is consulting on its first Housing Strategy which will cover the whole of North Yorkshire. A full version of the draft document can be viewed online: [North Yorkshire Council Housing Strategy 2024-2029 | North Yorkshire Council](#)

3. Overview of the draft strategy

- 3.1 The draft strategy is a concise document which outlines the council's vision for housing across North Yorkshire, its priorities, and the actions it will take. Its vision is to deliver "good quality, affordable and sustainable homes that meet the needs of all of our communities". To do this, the strategy is split into three themes – Our People, Our Places, and Our Homes.
- 3.2 Theme 1, 'Our People' is about meeting the housing needs of North Yorkshire and in particular older households, the homeless and those with supported needs.
- 3.3 Theme 2, 'Our Places' is about towns, villages and neighbourhoods and the housing market challenges they face, and what the council can do to tackle them. Growing the supply of affordable housing and addressing the rural crisis falls within this theme. It also identifies the second home issue facing coastal villages and National Parks in particular which is limiting the supply of private rental homes.
- 3.4 Theme 3 'Our Homes' is about the housing stock and how improvements can be made to ensure it is decent and affordable. This includes making sure they are energy efficient, and it identifies the need to decarbonise, contributing to net zero ambitions.

4. Officer comments

- 4.1 In general, Officers welcome the draft strategy which sets a vision for housing delivery for North Yorkshire over the next five years. As North Yorkshire Council is the housing authority for the National Park, we recognise the need for close working between housing and planning ambitions of the council going forward.
- 4.2 We question whether it reflects the outcomes of the North Yorkshire Rural Commission and the Task Force delivery work completed in 2022 i.e., the need to refocus housing to the more rural (deeply rural) parts of the area, referring to the need to build ten houses in every parish in the next five years. In addition, the NYCC Executive Report in November 2022 stated – “It is worth noting that North Yorkshire Council’s new Housing Strategy will also cover this objective from April 2023 and will include actions to support essential and low paid workers to access affordable housing in deeply rural places.”
- 4.3 Although a high-level strategic document, we question whether it goes far enough to address what it calls the rural housing crisis. It references the need to keep sufficient focus on affordable housing supply in our rural communities (page 15), but we feel this needs to be stronger to reflect the urgency of this issue.
- 4.4 As North Yorkshire Council is the housing authority for the National Park, we feel the strategy should make reference to the National Park Management Plan and its relevant outcomes. It should also recognise the specific housing challenges within the National Park which requires a bespoke approach – including that housing ‘delivery’ in the National Parks is through the planning role and policies of the two Authorities.
- 4.5 We welcome the reference to second homes being a major issue and the specific reference to the North York Moors, particularly the coastal area.
- 4.6 We also welcome the commitment to support the work of the Rural Housing Enablers who are instrumental in delivering our rural affordable housing sites in the National Park.
- 4.7 The strategy refers to Design Codes and decarbonising. It needs to recognise there are three separate local planning authorities within the Council area, so elements of the housing strategy have to be achieved jointly. Currently this is not acknowledged.

5. Financial and staffing implications

- 5.1 None.

6. Contribution to National Park Management Plan

- 6.1 The delivery of affordable housing is a key theme, specifically Objective 21 to deliver 100 affordable homes by 2027 and to press for changes to control the conversion of housing to second or holiday homes. The strategy will also contribute to Objective 22 to deliver low-cost, low-carbon, housing design and promote the deployment of sustainable materials and responsible retrofitting measures.

7. Legal and sustainability implications

- 7.1 None.

8. Recommendation

- 8.1 That Members note the contents of the draft North Yorkshire Council Strategy and agree to the Officer response as outlined in Section 4 above, plus any additional comments made by Members at the meeting.

Contact Officer:

Clair Shields

Planning Officer

01439 772700

Background documents to this report

Draft North Yorkshire Housing Strategy

North Yorkshire Council Housing Strategy 2024-2029 | North Yorkshire Council

Public Health Comments on the North Yorkshire Housing Strategy 2024 – 2029

1. Introduction - should the plan emphasise more the relationship between health and home?

'Our vision is to deliver good quality, affordable, **healthy**, and sustainable homes that meet the needs of all our communities'

In line with the desire to “Develop inclusive places” we need to ensure housing is a key part of developing healthy local places. Housing is one of the ‘building blocks for health’. A house is much more than bricks and mortar, it is a home and the heart of family, a solace from the outside, for some its role is broader, the recent Covid-19 lockdown highlighting the importance of home in our lives and its new role as a workspace as well as a living space for people. It is important to set out at the beginning what the plan is seeking to achieve, for who and when. In this case that the residents of North Yorkshire have a decent, affordable home. The relationship between home and health could be added, and opportunities for the housing sector to contribute to this.

1.1. Figures - What outcomes is the plan seeking to achieve or contribute to? What is the vision and how will success be measured?

This link between housing and health is really important given the figures in this section saying 108,000 people are limited by health and disability (this equates to around 17% of our population) and that 27% of our housing stock is built pre-1919. Poorly maintained, cold, damp housing adversely affects health. For example:-

- i) Cold Damp Homes article - [Thousands of babies and toddlers falling sick from damp homes in Britain, NHS doctor warns | Children | The Guardian](#) (“Around 31,000 children are admitted to hospital each year with RSV related conditions. Evidence from other countries with comparable housing conditions to the UK would suggest that around 20% of these are likely directly linked to damp or mould-ridden homes”)
- ii) Off grid Homes– we should have number for those not on main gas grid etc.? Important to note
- iii) Numbers living in Park Homes – we should have indication of what housing stock comprises of (e.g. high number of people living in mobile homes)

1.2. Strategic Context - What are the main health related issues that the plan wants to address, for which population(s), and when?

Would put ‘critical to individual and community **health and** wellbeing’

Another example, section 1.1 mentions reduced working age population, so we need to make improved life chances for young people, reduced dependency on public services from those with complex needs, reduced delayed transfers of care,

increased labour market participation etc. The housing strategy could help this including what is already mentioned re quality affordable sustainable housing.

The Local Transport Plan should also be mentioned as a key strategy (and another key 'building block for health')

1.3. Challenges - what are the main mechanisms to overcome these barriers to achieve the desired outcomes?

Some of these are listed as aspirations in 1.4 Opportunities. For example, a single investment fund, integrated commissioning and delivery, new technology, workforce development, data sharing, market development, new homes, empowering communities etc

1.4. Opportunities and Aspirations - Who is the governing body for the Strategy? Who will be held to account?

At this point in the strategy we should be clear about this otherwise it's another document without action. Clear outcomes relating to health could be measured in Section 7. Is there a link to the new Retrofit Board?

2. Our Vision – has the impact of the home on health and wellbeing been considered in the strategy?

'Our vision is to deliver good quality, affordable, *healthy*, and sustainable homes that meet the needs of all our communities'

Having reviewed the strategy's intended outcomes and planned mechanisms to overcome barriers, it's unclear whether there is evidence of an understanding of the impact of the home environment and/or housing circumstances on health and how these may have an impact on achieving the aims of the plan.

It's unclear for example whether the priorities have been based on the [Joint Strategic Needs Assessment](#) approach? We need to be clear we are taking action for the benefit of the most vulnerable and new JSNA could show vulnerable older people living in cold homes in unexpected places such as park homes.

Good to see People prioritised first.

3.1. Homelessness - Is it relevant to consider the relationships between health, and home and housing circumstance?

Good to see Homelessness prioritised, 'bringing together homelessness prevention and support services' – will that include e.g. mental health services, finance, Drug and Alcohol Services NY Horizons etc? and the needs of specific groups that are more vulnerable to health inequalities?

3.2. Ageing - Is it clear where the intended beneficiaries of the plan live?

By just mentioning the ageing population, have we forgotten the missing 40,000 people in our younger population (reference North Yorkshire Rural Commission) and need to encourage a younger demographic into North Yorkshire and not just increase the provision of extra care for our ageing population? We need to provide affordable accommodation for employees as its hard to recruit into an area like North Yorkshire so the younger population move away.

Although the ageing population are most susceptible to health impacts of hot and cold homes (which will become worse with climate change) **The young are also very susceptible to this too** – need to keep thermal comfort in mind as well as mobility **for all to be healthy**.

3.3. Specific Groups - Have the following been described in terms of their impact on the beneficiaries' health and wellbeing?

- a. The healthiness of current homes?
- b. The suitability of current homes?
- c. The stability of tenure of current homes?

This links to the need to complete a JSNA for housing and health. It means also including the “working age” younger populations housing needs too.

“Ensuring better integration of health and social care in line with the Start Well – Live Well – Age Well approach community based preventative pathways” – unsure what this actually means? Should it also include integrating housing with health and social care in its widest sense, rather than just Health and Adult Social Care?

4. Places - Are plans in place to improve health through the places around housing developments?

Does this section needs to give more in the way of tangible answers beyond ‘understanding need’ and ‘looking for opportunities’? Anything around ‘local connection’ or ‘principal residence’ clauses, or ensuring developments have smaller, affordable properties as well as 4/5 bed ones?

See affordable rural housing guide [Aug-2020-CPRE-Affordable-Housing-guide.pdf](#)

Even if the plan has not described where the beneficiaries live or the impact on health and wellbeing, we need to include priorities in the strategy to improve the areas around the home environment or housing circumstances. For example developing Marmot Cities [Coventry: a Marmot City – Coventry City Council](#) approach or the 20 Minute neighbourhood approach [The 20-Minute Neighbourhood Guide - Town and Country Planning Association \(tcpa.org.uk\)](#) so that housing developments are not done in isolation creating disconnected, isolated communities without social networks and access to the building blocks for health e.g. local supply of accessible, fresh food.

4.1. Affordable & Available Homes - Are there specific proposals to improve the home environment or housing circumstances as a means to achieve improved health and wellbeing? What are these?

If not, what else could be included? For example, not just about being digitally enabled/connected – need to work with transport, planners etc. to look at other services.

Also infrastructure connectivity – We should be highlight we need to be moving away from gas to renewable energy sources?

4.2. Rural Homes - Are these proposals adequate to address the identified housing and health issues or those issues we know or could reasonably expect to exist in our local area?

If not, what else could be included? There is no mention of health and health inequalities in this section, despite higher up talking about health inequalities . Ill health should be on list of contributing factors.

4.3. Regeneration - Has the potential for the local housing, health and social care workforce to contribute to intended outcomes been identified?

If not, what else could be included? Does the authority have a pipeline or priority areas where focused cross service efforts would achieve greater outcomes?

For example, there is definitely scope in 5.3 to include some of the specific quality issues around housing, and their links to health e.g. ensuring appropriate ventilation and other measures to decrease damp/mould etc. which lead to chronic respiratory conditions.

Net zero/energy efficiency is mentioned but not wider quality issues, e.g. over-crowding, sanitation, siting of housing – all with links to poor health.

On net zero – anything Re Passivhaus?

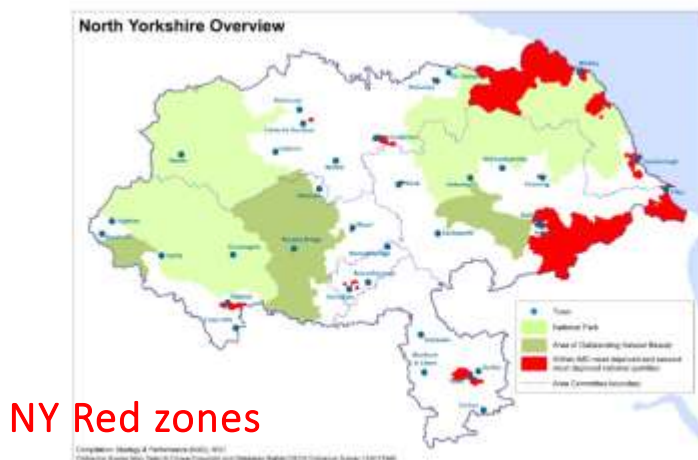
5. Homes - Are plans in place to improve health through the home?

Can the strategy describe where the beneficiaries live or the impact on health and wellbeing? Could we include priorities in the strategy to specifically improve the areas around the home environment or housing circumstances?

6. Equality - Are plans in place to reduce health inequalities through the housing strategy?

We have a number of “Red Zone” areas of North Yorkshire where there is the greatest level of health inequalities linked to the index of multiple deprivation (IMD). Are we linking these areas to the housing strategy to support the areas where people

die early e.g. through home improvements/ housing actions to reduce health inequalities?



It is unclear to what extent has the strategy been co-produced with the people mentioned under the Equality Disability Inclusive lists? Older people? People with physical disabilities/learning disabilities? GRTS community etc.?

It says we will take into account of their needs – how has that been done to arrive at the strategy?

7. Performance Indicators – Are we including the housing measures linked to inclusive sustainable economies?

In the Data Appendix for Inclusive Sustainable Communities [Inclusive and sustainable economies: leaving no-one behind \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) we have a number of indicators which could be linked to the housing strategy and help tackle health inequalities?

Examples of indicators from the Inclusive Sustainable Economies Dataset (Appendix A page 50 [Inclusive and sustainable economies: leaving no-one behind \(publishing.service.gov.uk\)](https://publishing.service.gov.uk))

- Affordability of home ownership
- Statutory homelessness: rate per 1,000 households
- Adults with a learning disability who live in stable and appropriate accommodation
- Adults in contact with secondary mental health services who live in stable and appropriate accommodation
- The rate of complaints about noise, damp, mould
- Occupancy e.g. numbers of HMOs and monitoring of overcrowding
- Number of premises licensed to sell alcohol per square kilometre

IN CONCLUSION we welcome the opportunity to work with you on the health and housing agenda and thank you for the opportunity to engage from our Public Health Team –

Contact:-





Housing

Quality of Evidence:

- ▲ Improved
 - ▼ Reduced
 - High Quality
 - Medium Quality
 - Low Quality
 - NR (Not reported):
- Methodological quality of the original research is unclear and should be treated with caution.

Greyed Out Text

Association between a health impact & health outcome not obtained as part of the umbrella review.

Best Available Evidence:

- * In some instances, more than one piece of review-level evidence reporting on the same health impacts and/or outcomes was identified as part of this umbrella review. In such instances this table highlights findings of the review(s) which reported evidence of the best methodological quality.

Population Groups:

- General Population
- Older Adults
- Children & Adolescents

Disclaimer:
This diagram has been produced as part of a wider evidence resource, commissioned by Public Health England and developed by the University of the West of England. Please see the document Spatial planning for health: an evidence resource for planning and designing healthier places for further information.

Planning Principles



Improve Quality of Housing



Increase Provision of Affordable and Diverse Housing

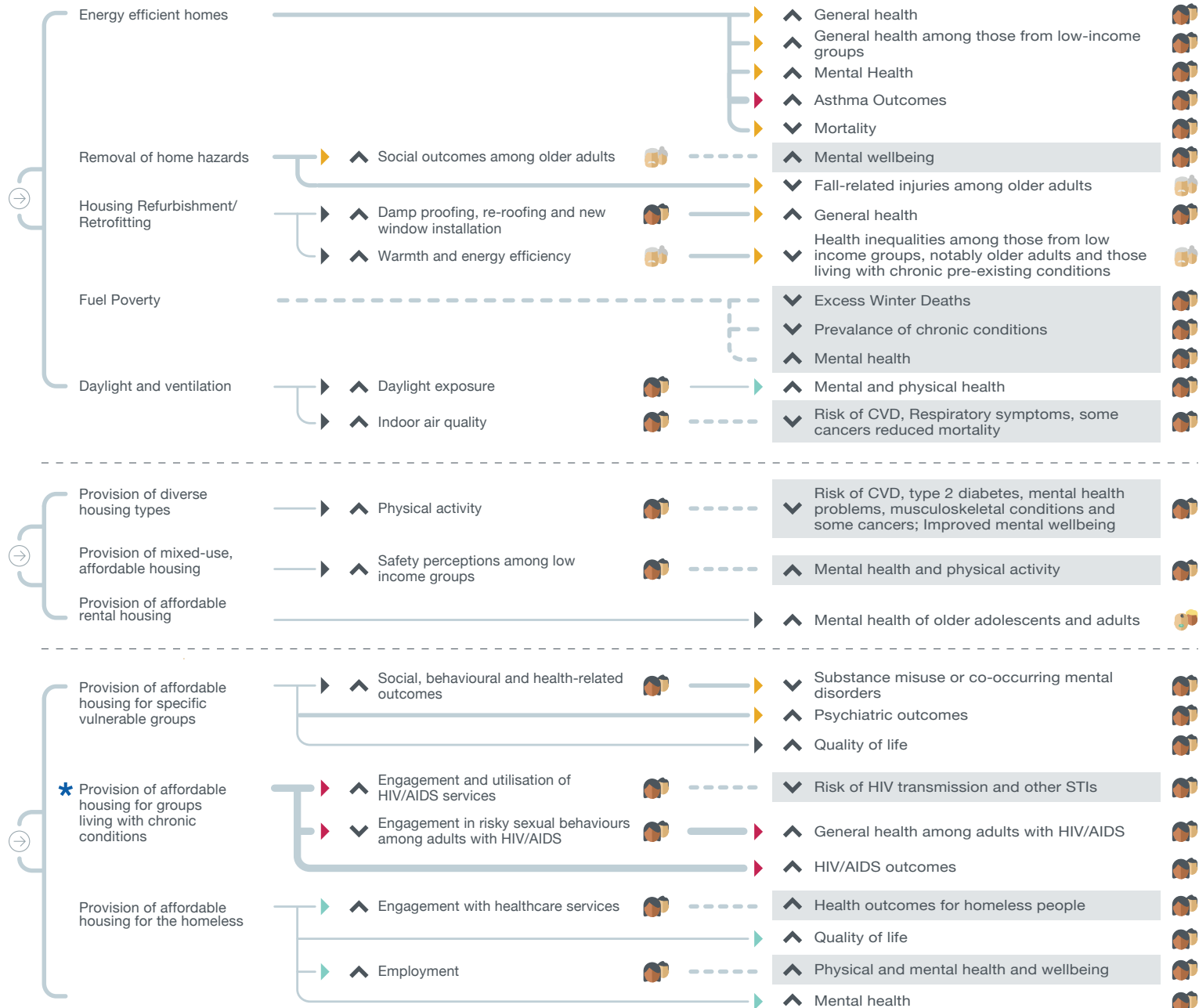


Increase Provision of Affordable Housing for Groups with Specific Needs

Modifiable Features

Impact

Health Outcomes



NORTH YORKSHIRE WIDER PARTNERSHIPS CONFERENCE OCTOBER 2023 - FEEDBACK

Workshop 5 – A Vision for Housing in North Yorkshire: Challenges and Opportunities

Q1: Have we got the right vision for housing in North Yorkshire? Have we got the right priorities? Are our priorities your priorities?

VISION - support

The strategy vision is clear and makes sense

Broad support for the vision, but it should be underpinned by detailed actions – how will it be achieved?

Could it include something around health and wellbeing?

VISION - communities

Who is it for?

Should it be for all our communities, or should it be more focused on those that require support?

Need to reference listening to the needs of all communities

Should we use 'Communities', 'residents' or 'people'?

Inclusivity needs to be at the forefront – 'residents and communities'

Should we have a 'Mission' under the vision – how will it be delivered?

VISION – sustainability

Sustainability – means different things to different audiences (tenancy sustainment, low carbon design and build, innovative solutions) are we committed to all?

Could the vision include reference to the future – this is just a 5 year plan but setting up the stage for housing going forward.

PRIORITIES – People

Pleased to see that 'People' is the first priority.

Would like to see reference to Domestic Abuse Awareness and trauma informed service delivery.

Upsurge in homelessness needs to be addressed – how will we track rough sleeping accurately?

PRIORITIES – Places

Places and homes need to be connected.

Transport links need to be improved to help communities survive/thrive.

Technology needs to be improved to help communities stay connected

Green space connectivity linked to an SPD for climate change.

Residents want quality of place above quantity

Priorities should be area focused and meet specific localised need - need to understand our different housing markets

Huge supply and demand gaps – must keep pace with a changing market

PRIORITIES – Homes

Should be aiming to be 'exemplar', not just 'decent' homes – doesn't sound ambitious enough.

Concern around the quality and management of Registered Provider stock across North Yorkshire and improving that.

Concern over the loss of private rented stock

Support for the development of new council housing

Could the build and sale of market homes be used to raise finance to support affordable housing development?

Q2: Have we identified the correct objectives? Will fulfilling them address our challenges?

OBJECTIVES – People

Meeting needs for specific groups: which specific groups do we mean. Some not stated in draft strategy, e.g. ethnic minorities. Need to articulate different groups and how different needs will be addressed.

Would like to see Choice Based Letting universally

Homes need to be 'person centred'

Staff should be trained on dealing with people with complex needs

Reference to the Giroscope project in Hull – self help housing, leaving the tools behind for communities to help themselves – Innovation and community asset transfer.

Need to tie into the broader anti-poverty agenda – huge pockets of deprivation across NY.

Homes for key workers /service staff – supporting the local economy

OBJECTIVES – Places

Importance of aligning with the Local Plan: policies within the Local Plan needed to address the objectives, e.g. older persons population, decarbonisation

Importance of Neighbourhood Planning

Issue of lack of services/infrastructure in villages to support additional housing; however, on other hand, affordable housing needed to sustain local services in villages, e.g. primary schools

Do strict local connection criteria for exception sites support or hinder sustainability of rural villages (many require new as well as existing households to support local services)

Action required around holiday homes/ second homes

Community Led Housing, too many dominant voices – need to develop a framework which is inclusive, diverse, democratic – to help communities untap opportunities.

OBJECTIVES – Homes

EPC C – not ambitious enough, need to act now, especially on new builds to ensure sustainable innovative solutions in place - solar, ground heat etc. Retrofit should be prioritised.

'working towards' should be 'meet'

Reference to benefits of modular build, light footprint

Q3. What are the opportunities to work together? How can your organisation contribute to our vision for housing and housing services? How can NYC support your organisation achieve its aims through our Housing Strategy?

PARTNERSHIP – People

Domestic Abuse training – opportunity to work together to develop a whole ‘trauma informed’ support package for victims

Working with people with complex needs – organisations can provide that expertise NYC officers can use as the complexity of needs is increasing and pressure on all services is growing.

PARTNERSHIP – Places

Community Led Housing – a key part of the solution - working with communities to enable them to deliver the local homes they require.

Community Organisations -building community resilience and a sense of belonging to places

PARTNERSHIP – Homes

Retrofit- working with the private sector to speed up retrofit delivery

Community Furniture organisations – providing furniture packages to residents

RE: COMMENTS ON THE NORTH YORKSHIRE COUNCIL HOUSING STRATEGY 2023-2029

On behalf of our clients, Taylor Wimpey, Spawforths has been instructed to submit comments on the Consultation Draft North Yorkshire Housing Strategy 2023-2029. Taylor Wimpey is one of the UK's leading residential developers, with over 125 years of experience. Taylor Wimpey's purpose is "to build great homes and create thriving communities". Taylor Wimpey welcomes the opportunity to engage with North Yorkshire on the Housing Strategy and forthcoming Local Plan.

Taylor Wimpey is supportive of the ambition within the North Yorkshire Housing Strategy, in particular the ambition to increase the supply of homes. Taylor Wimpey has a significant interest in North Yorkshire and can play a significant role in supporting the Council to deliver on the aims and objectives of the housing strategy through the delivery of new homes. It is in this context that Taylor Wimpey make the following comments on the Draft Housing Strategy.

To what extent do you agree with the Vision Statement?

Taylor Wimpey agree with the Vision Statement to deliver "Good quality, affordable and sustainable homes that meet the needs of all our communities". This is strongly aligned with Taylor Wimpey's purpose of delivering great homes and creating thriving communities. Taylor Wimpey has a focus on improving environmental performance, fostering community networks, supporting local economic activity, and helping customers to adopt a more sustainable lifestyle. Taylor Wimpey through strong placemaking principles seek to deliver schemes that promote social, environmental, and economic sustainability and the well-being of future residents. Page 2 of 4

Taylor Wimpey agree with the ambition to deliver more homes. Taylor Wimpey makes a significant contribution towards the provision of housing, providing both private and affordable homes. In 2022 the group delivered 14,154 homes and are committed to delivering high quality homes, 21% of which were affordable homes. Taylor Wimpey has significant interests in North Yorkshire and is committed to delivering high quality sustainable developments in key settlements. Since 2018 Taylor Wimpey has delivered 1373 units in North Yorkshire over the last five years (circa 275/annum). Taylor Wimpey can therefore play a significant role supporting the Council to deliver on their ambition and vision. Accordingly, Taylor Wimpey consider that the Strategy should recognise the role of the private sector in the delivery of new homes.

To what extent do you agree/disagree that we have the correct priorities for the "people" theme?

Taylor Wimpey agree with the Council's priorities to prevent and tackle homelessness, meet supported housing needs, the needs of specific groups and meet the needs of an ageing population. With respect to the latter, Taylor Wimpey welcomes the recognition of the issues relating to an ageing population, however, Taylor Wimpey considers that actions to tackle this matter do not resolve solely around provision of extra care/specialist accommodation and home improvements. Taylor Wimpey considers that the market has a role in delivering suitable house types for an ageing population to provide a choice. Significantly, Taylor Wimpey consider that it is important that the 'people' theme recognises the need to attract and retain the working age population in order to sustain and grow the north Yorkshire economy, as well as deliver the workforce needed to support an ageing population. The increased supply of the right type of homes in the right locations, both market and affordable will be critical in ensuring that North Yorkshire tackles the complex issues surrounding an ageing population.

To what extent do you agree/disagree that we have the correct priorities for the "place" theme?

Taylor Wimpey agree that the priority in the Place theme is growing the supply of housing. Taylor Wimpey would stress that the priority should clarify that this should be across all tenures. As highlighted above Taylor Wimpey, make a significant contribution to housing delivery, both market and affordable. Taylor Wimpey welcome the Housing Strategy's recognition under 'meeting these challenges' that the delivery across all tenures will be vital. Taylor Wimpey would however highlight that average delivery across North Yorkshire over the last five years has been significantly in excess of the 2,537 homes per annum (over 3,100/per annum), and that in order to address the challenges highlighted in the Housing Strategy around

ageing population and affordability that the overall quantum of housing will need to be significantly higher than 2,537 homes per annum.

Taylor Wimpey are committed to supporting the delivery of affordable housing in North Yorkshire. Taylor Wimpey consider that this can be best achieved through the S106. However, Taylor Wimpey note the current transfer values artificially restricts Taylor Wimpey's ability to deliver affordable housing through S106 agreement, or to provide other S106/public benefits. Transfer rates should be determined on a site by site basis, subject to the market area and build quality. Transfer Values will become quickly out of date if they are not reviewed regularly (more than annually), and it will be difficult to reflect the diverse range of markets across the Plan area. Should the Planning Authority seek to maintain transfer values, these will need to reflect the diverse market areas across North Yorkshire, allow for negotiation and be subject to thorough viability testing, with a range of sensitivity testing. Taylor Wimpey would draw the Council's attention to Paragraph 34 of NPPF and planning practice guidance which requires careful consideration, through the use of viability assessments, of the effects of proposed Plan policies on deliverability. The cumulative cost of all relevant policies should not undermine the deliverability of the Plan.

Taylor Wimpey welcomes the opportunity to engage with the Council on the review of housing and affordable housing policies through the Local Plan, and any supplementary planning documents.

Taylor Wimpey also notes that the Housing Strategy refers to a couple of allocations in Selby. Taylor Wimpey highlights at the time of writing the Selby Local Plan has not been submitted to the Planning Inspectorate for Examination. Therefore, references made to 'allocations', such as the new settlement and Eggborough, should be updated to reflect their current status 'draft' or 'proposed'.

To what extent do you agree that we have the correct priorities for the "home" theme?

Taylor Wimpey supports the priorities under the 'homes' theme, including ensuring new homes contribute to net zero ambitions, and improving the quality of housing stock. The strategy highlights the role in the Future Homes Standard and Design Codes in meeting this challenge. Taylor Wimpey has a purpose of building great homes and creating thriving communities. Aligned to that purpose Taylor Wimpey has a focus on improving environmental performance of homes, and is already in the process of piloting homes that meet the Future Homes Standard, to meet regulations and deliver energy efficient homes for Taylor Wimpey's customer's. The Housing Strategy highlights the role of Design Codes and Future Homes Standard, Taylor Wimpey would welcome the opportunity to engage with the Council during the preparation of future Design Codes and standards. It will be vital to ensure that any policy

Page 4 of 4
requirements for new homes are subject to appropriate viability testing, in line with the requirements of national policy.

Do you have any other comments on the draft housing strategy?

In order to meet the aims and objectives set out in the Housing Strategy, it will be essential that the housing strategy and delivery through the Local Plan is underpinned by robust viability evidence, particularly noting the significant variations in market conditions across the authority area, and the challenging market conditions with expensive mortgage borrowing and cost of living challenges.

Conclusion

Taylor Wimpey welcome the opportunity to further engage with North Yorkshire on the Housing Strategy, the forthcoming Local Plan, and any future design codes. Taylor Wimpey trust that these comments are duly made and look forward to your response.

Should you require any additional information to assist you in your consideration of these comments, or wish to engage with Taylor Wimpey further, then please do not hesitate to contact us.

Threshfield Village Development Concern Group
Cllr. Simon Myers
Executive Member for Culture, Arts and Housing 23 November 2023
North Yorkshire Council
Dear Councillor Myers,

Re. Draft Housing Strategy for North Yorkshire

I am writing to you on behalf of the Threshfield Village Development Concern Group(TVDCG) in response to the current public consultation on the draft Housing Strategy for North Yorkshire. A short description of TVDCG is provided at the bottom of this page. Pages 2 and 3 of this letter suggest five things (which we have called 'recommendations') that we feel are vitally important for this housing strategy to be relevant. We have also responded to the online questionnaire on the NYC website. Although all of the residents of Threshfield (in Upper Wharfedale) are council tax payers to North Yorkshire Council, we live within the Yorkshire Dales National Park and hence within the planning area for YDNPA rather than the planning area of NYC. However, we believe strongly that any housing strategy (or other similar policy) needs to be congruent across the three planning authorities of North Yorkshire (North Yorkshire Council, Yorkshire Dales National Park Authority and North York Moors National Park Authority), albeit that there will be some differences between planning areas, particularly within the national parks where they will likely be more restrictive. As you are also a NYC appointed Member of YDNPA, I am sure that you will be particularly aware of your responsibilities to both authorities and our five 'recommendations' apply equally to both the NYC Housing Strategy and the YDNPA Local Plan.

I trust that you will accept this letter in the same constructive spirit that it has been written – by residents of a village in the Yorkshire Dales National Park within North Yorkshire who are passionate about the village community in which they live as well as the wider community and environmental context of the Yorkshire Dales National Park and the county of North Yorkshire. TVDCG is offering to engage with NYC as a consultee body - an offer that we have also made to YDNPA earlier this year.
Yours sincerely,

Threshfield Village Development Concern Group(TVDCG) represents ~120 households in Threshfield and was formed in March 2023 to represent the views of these residents in response to the YDNPA Local Plan 2023-40 Consultation No.6.
Threshfield Village Development Concern Group

Feedback for NYC Draft Housing Strategy – November 2023

1. The cultural heritage of North Yorkshire's villages and other settlements.

Section 1.1 of the draft North Yorkshire Housing Strategy states that: *"North Yorkshire is the largest county in England and Wales at 8,000 square kilometres"*

The Yorkshire Dales National Park covers 2,179 km² and the North York Moors National Park covers 1,435 km². It therefore follows that almost half (45%) of the area of North Yorkshire falls within one of the two national parks.

Section 4.2 of the draft North Yorkshire Housing Strategy further states that:

"85% of North Yorkshire is super-sparse: 17% of our residents live in a super-sparse area. 13% of North Yorkshire is sparse: 18% of our residents live in a sparse area".

It therefore follows that 98% of North Yorkshire is either 'sparse' or 'super-sparse' thus

representing the vast majority of the land area of North Yorkshire. Over one-third (35%) of the population of North Yorkshire, representing nearly 217,000 people, lives in these areas¹. These 'sparse[ly]' and 'super-sparse[ly]' populated areas comprise villages, scattered settlements and isolated farms and houses often located in wild countryside. This is especially so when they are located within one of our two national parks as confirmed by their names: Yorkshire **Dales** National Park and North York **Moors** National Park. The form and cultural heritage of these villages and settlements is a vital part of their character and any proposed new housing development must be integrated within them and not in itself create a dominant feature. It is vitally important (and in the case of National Parks it is their statutory duty which is under-pinned by the Sandford Principle) to conserve and enhance this cultural heritage.

Recommendation 1:

Any development proposed for a village or settlement in a 'sparse' or super-sparse' area of North Yorkshire must be limited to a scale that is appropriate to the individual settlement's size, character and function. In particular, new developments must not be a dominant feature of those villages and settlements. This is especially important when a new development is within a national park.

2. Successful strategies result from active engagement with local residents.

Given the data stated in the first two paragraphs, it is surely self-evident that ANY Local Plan, Housing Strategy or similar policy document which is applicable within those 'sparse' and 'super-sparse' areas of North Yorkshire must take significant guidance from the concerns of the residents living therein. To do otherwise, surely ignores local democracy and risks lack of acceptance by those communities.

Recommendation 2:

Guidance must be taken from local residents and they should also be involved in helping to shape housing solutions that are both acceptable and workable.

3. Strategies from all planning authorities across North Yorkshire need to be coherent.

Whilst the three planning authorities (NYC, Yorkshire Dales National Park Authority and North York Moors National Park Authority) are each individually responsible for their own geographic areas, it would be ridiculous if the policies of those three planning authorities were not congruent and were, instead, to conflict with one another.

¹ North Yorkshire Council Housing Strategy 2024-29

Threshfield Village Development Concern Group

-

Recommendation 3:

All policies which influence the Local Plans and Housing Strategies etc. across the three planning authorities within North Yorkshire must be congruent and not conflict with one another.

4. Brownfield Sites

It has been explained above how it is important not to overwhelm villages and settlements with large, new housing developments. It has also been stated that residents should be involved in helping to shape housing solutions that are both acceptable and workable. In fact, one will find that most residents of villages are happy to see some new housing development provided that it is of a suitable size and in a suitable location. Furthermore, any such development should meet identified local housing needs and not simply create 'dormitories' for commuters to regional conurbations.

As stated in Section 4.3 of the draft North Yorkshire Housing Strategy, any housing strategy should prioritise the consideration of brownfield sites, where they exist. The development of such sites is likely to create fewer objections from within the local community, they could be used to provide a combination of both business and residential property and they may well be a catalyst for attracting additional funding from either private or government sources.

However, in my own locality (Threshfield in Upper Wharfedale) the YDNPA appears thus far to have done little, if anything, to take advantage of brownfield sites like Linton Camp, Threshfield Quarry or the North Yorkshire Council Depot Yard in relation to new housing.

Recommendation 4

Brownfield sites can potentially address multiple issues in one go, including: removing a site with little amenity value; allaying the concerns of local residents; potentially providing the opportunity to build a larger development than would otherwise be acceptable within the normal confines of a village; leveraging additional sources of funding and potentially combining both housing and employment opportunities.

5. Affordable Housing

Section 4.2 of the draft North Yorkshire Housing Strategy highlights the importance of the availability of affordable housing and rightly so. However, the standard approach by planning authorities to this challenge appears to be to require housing developers to subsidise the affordable housing by allowing them to also build larger, more expensive properties at the same time. It would seem that many developers require a very high ratio of 'expensive' to 'affordable' homes in order to maintain their gross margins. Furthermore, it is not at all unknown for developers to require an increase in this ratio after planning permission is granted, but before footings have been dug (a form of coercion). The end result is that overall, more homes have to be built than are actually necessary and a lesser proportion of those properties are 'affordable' homes which was the original objective.

Recommendation 5

A proportion of affordable homes is desirable, especially in rural areas. However, more imaginative financing is required than simply expecting (allowing?) a developer to decide (through their own costing models) how many houses in a new development shall be 'affordable' homes versus 'expensive' homes.

UDCLT Response to NYC Housing Strategy 2024-2029

The Upper Dales Community Land Trust operates in the area known as the Upper Dales County Division in North Yorkshire. Established in 2017, we work with North Star Housing Group, a Registered Provider, to renovate a chapel in Bainbridge to provide two 2 bedroom affordable apartments for rent. We are exploring opportunities in other areas and are about to embark on a Housing Needs Assessment in Reeth and the surrounding parishes.

1. Introduction

We will take a proactive approach to housing delivery, and we will develop a bold plan to deliver more homes, including more affordable homes, working with partners, across North Yorkshire over the next five years.

We welcome a proactive approach to housing delivery, in particular affordable housing and the emphasis on sustainable delivery. We are pleased to see support for working with Homes England, Registered Providers and working in partnership with community led organisations.

2. Vision and Key Themes

Good quality, affordable and sustainable homes that meet the needs of all of our communities.

We support this vision and believe we can contribute to the key themes of people and places in particular given we are a volunteer community led charity.

3. Our people

Whilst we applaud the recognition given to vulnerable and disadvantaged groups, local people who cannot afford local prices are not recognised sufficiently here and we consider they should be included. The group we would highlight are young families, who are important to the community sustainability.

4. Our places

Our key priorities for this theme are

- *growing the supply of affordable and available housing*
- *addressing the rural housing crisis.*

Affordability is exacerbated by North Yorkshire's low wage economy... This means that fewer local households can afford to purchase a home on the open market and are reliant on other forms of tenure. We understand that a lack of access to affordable housing acts as a barrier to economic growth, as well as putting pressure on the delivery of essential services as those on lower income struggle to access housing within our high value constrained housing market and we are committed to increasing the availability of affordable housing.

As a result, we urgently need to increase the supply of affordable housing.

We support growing the supply of affordable housing and addressing the rural housing crisis.

We will meet these challenges by:

- *maximising all sources of funding to support affordable housing viability and boost delivery*
- *reviewing all our land assets to identify land that could be used for new housing (affordable and market homes)*
- *developing our affordable housing delivery model, ensuring that we capture the best delivery models and develop them further to enhance affordable housing supply*

- *working with partners, including the Mayoral Combined Authority, to better understand the need for key worker accommodation across North Yorkshire*

There is no mention here of working with the National Parks as a partner. This is crucial for developing affordable homes in these areas. In addition, the cost of building affordable homes in the National Parks is greater due to stringent planning arrangements. We do not disagree with this as we wish to maintain the beauty of the parks, but we do think this needs to be recognised by funders and NYC.

We will meet these challenges by:

- *supporting the Rural Housing Enabler Partnership and Community Led Housing groups – to ensure a supply of housing is maintained, of the right quality, type and tenure in rural areas*
- *keeping sufficient focus on affordable housing supply in our rural communities*

We recognise the above groups as supportive organisations but feel their contribution needs to be enhanced. For example, the RHE in the former Richmondshire area is only working 1.5 days a week.

5. Our Homes

We will meet these challenges by:

- *working with our Registered Provider partners and Homes England to implement investment plans to make their homes warmer and more affordable to live in*

We support making properties energy efficient to help minimise fuel costs for tenants and to protect the environment.

6. Equality objectives

We support addressing the wider needs of our local communities and recognise the discrimination faced by those in more vulnerable groups.

Overall

We welcome the content of this strategy and the way it has simply and clearly been laid out. For those of us working within the National Parks, we emphasise again the need to work in partnership with the Parks Authority and to include them in this strategy as well as the need for young families to be recognised as a significant group in maintaining community sustainability. We look forward to working with North Yorkshire Council in future.


27th November 2023

Submission
From the Wensleydale and Coverdale Parish Council Forum

Draft North Yorkshire Housing Strategy 2024-2029

At a meeting on 22 November 2023, representatives of the seven Parish Councils, which form the above named Forum, met to consider a consultation request from the North Yorkshire Council on the Draft North Yorkshire Housing Strategy. The meeting was chaired by County Councillor Yvonne Peacock. The following is a summary of the comments that were made in response to the Housing Strategy questionnaire.

Questions 1 and 2

We are a Public Sector forum based in Richmondshire. All our member Councils are located in the Yorkshire Dales National Park. Question 3 is not applicable.

Question 4 – Vision

The meeting strongly agreed with the proposals put forward in the vision statement. With regard to the reference to ‘all our communities’, please see our answer to Question 5.

Question 5 – People

Councillors agreed with the priorities, particularly with regard to the aging population, which is significantly represented in the National Park. However, our emphasis is less on homelessness, refugees and asylum seekers, and more those affected by the lack of affordable homes, such as young working families. Another concern is the lack of available rental properties for single workers in the hospitality and other industries, which form a large part of the economy of the National Park. The situation is exacerbated by the large numbers of second homes and holiday lets.

Question 6 – Places

The meeting agreed with the key priorities, particularly the aim to address the rural housing crisis, mentioned in our response to Question 5. However, there is no acknowledgement of the role of the Yorkshire Dales National Park Planning Authority which governs all development in our area. Does the North Yorkshire Council intend to include the areas within the two National Parks in North Yorkshire, or does this strategy apply only to those regions in the rest of the County?

Question 7 – Homes

Whilst the meeting agreed completely with the need to improve the housing stock, it was felt that the aim of ‘Decarbonising the whole housing stock’ was unrealistic. For example, many older properties in North Yorkshire are unsuitable to be converted to air-source heat pumps. As a result, homes are reliant on oil or solid fuel, particularly as there is very little access to mains gas. The meeting considered that there should be more emphasis on what could work rather than what should work

Question 8 – Other comments

The meeting felt that there was an element of discrimination in the strategy against rural areas such as ours. The Power Point presentation makes the point that 98% of North Yorkshire is classified as sparse or super-sparse. 35% of the total population

lives in these areas, a significant minority, yet, there seemed to be an emphasis on solutions to problems which mainly concern the 65% urban population.

The meeting also felt that, in addition to the comments on issues of concern to us, made above, there are other matters which contribute to the sense that areas such as ours have been excluded from the thinking on this strategy. For example, in the Power Point presentation there is only a brief mention of digital exclusion. This is a considerable problem in rural areas like ours. Access to the internet is crucial in today's society in many different ways. Similarly, the infrastructure that most urban areas take for granted, such as the ready availability of schools, hospitals, GP surgeries, banks, shops and leisure centres, usually involve long car journeys for those of us living in the countryside, particularly in times of inclement weather. The lack of these facilities is, therefore, a major concern..

One aspect that was discussed at the meeting was the situation with housing associations, an issue that is presumable county-wide. It was felt that there was very little scrutiny by North Yorkshire Country of the performance of these associations in maintaining their properties, resulting in extensive delays to repairs.

Questions 9 – 13

These questions are not applicable

We would be very grateful if you would keep us informed of the progress of this Housing Strategy through [REDACTED] at the following email address

[REDACTED]

Thank you for the opportunity to comment on the strategy. It looks fairly comprehensive to me and no doubt picks up the emerging priorities of the new Council.

Our comments are:

1.2 Strategic context is it worth being slightly more specific and saying that new housing is also important for jobs, local businesses and local taxation receipts? ie. to support the hospitality industry, contract working, land management work, first time jobs, students, young people, flexible working etc)

1.3 Challenges should the challenges also include reference to pockets of very high levels of second homes at the Coast and parts of the NPs? ie. impacts on community vitality. We support the reference to holiday letting in the strategy.

Should reference be made to the mismatch between available housing stock and household need ie. the need for smaller and more affordable flats and apartments?

Should reference be made to households living longer which means low turnover of stock and therefore less opportunity for younger working age households?

4.1 Housing growth and affordable housing. lack of affordable housing is also a barrier to younger people (and probably more diverse households) living in NY.

4.2 Rural housing crisis Somewhere the strategy should state explicit support for the two National Park Local Plans where they would help deliver sites through allocations or concerted RES efforts, in the most rural parts of NY. Support and recognition for partnership working with the two NPAs would be helpful in resisting Nimbyism and supporting Member and Officer confidence to work towards positive outcomes.

5.1 Decarbonisation. Should it include reference to using the Planning system to support higher energy conservation standards and use domestic extension as an opportunity to improve building performance?

Section 5.3 repeats 5.2 ??

General comments

Should the strategy include some projections to indicate the current direction of travel eg. population, age, household size, climate change?

Should there be something explicit about working with landowners to find sites ?

Should the phrase 'council house building' appear in the strategy as well as 'growing the council's housing stock' ?

Should there be specific reference to first time households and younger working age people, because they are key to the future economy and community vitality (ie schools, sports clubs, meeting places, volunteering, governance etc)?

Should it mention Neighbourhood Planning and Community Led Housing?

Should there be reference to an 'empty homes' strategy?

Should there be support for 'build to rent' and the wider benefits of a larger, professionally run, rental sector in NY?

This is the Authority's own statement on housing:

<https://www.yorkshiredales.org.uk/park-authority/living-and-working/planning-policy/delivering-new-homes/authority-statement-on-housing/>

Kind Regards,



██████████
Head of Sustainable Development

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www.yorkshiredales.org.uk



Yorkshire Dales National Park Authority
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Date: 11 December 2023

“Let’s Talk Housing” North Yorkshire Council Draft Housing Strategy Consultation – a response from Zero Carbon Harrogate

Introduction

Zero Carbon Harrogate (ZCH) is a member-based charity that draws support from a wide range of people across the community in the Harrogate area. We are engaged in climate action across a wide range of activities including energy, transport, buildings and nature-based solutions mainly through volunteers, though we have an employee working on a project to promote energy retrofitting in housing to improve energy efficiency and reduce dependence on fossil fuels.

We have actively encouraged our membership and supporters to engage with this consultation through the online questionnaire. We are managing an Industry Energy Redress funded project to ready the construction industry through an upskilling programme, thereby creating a body of local building and related professionals and tradespeople who are able to take on the demand for domestic retrofitting work that is already manifesting itself amongst homeowners in Harrogate. ZCH is one of the partners in a proposed LEAD project funded by Tees Valley Combined Authority in conjunction with NYC, Align Property Partners and Climate Action Stokesley and Villages (CASA_V).

ZCH is a member of the North Yorkshire Climate Coalition and welcomes the opportunity to join with the Coalition in engaging with the Council to discuss the way in which it tackles climate issues in the way it administers its housing responsibilities.

The comments in this note ignore most of the proposed strategy as they are outside our remit as a climate charity. Rather we focus on the issue of energy consumption by housing and, implicitly, the level of comfort provided (and we include within that the owner-occupied element of the local stock). We are also concerned about new-build standards, the upgrading and extensions to housing (mainly by owner-occupiers) and the retrofitting of existing the housing stock.

At present housing accounts for 299ktCO₂e, 20% of all local greenhouse gas emissions, within the local area. Therefore it is essential in moving towards a net zero target that housing plays a full part in any carbon reduction strategy. We are firmly supportive of a 'fabric first' approach. Thus reducing energy requirements should come first, alongside replacing and decarbonising the sources of home heating. Finally, it is important to decarbonise housing construction. This should be tackled through careful use of materials, minimising the use of high-carbon materials, and focusing construction as far as possible on local, renewable and recycled materials, particularly timber.

Summary of high-level comments on the draft Strategy



We welcome the draft Strategy as a means of tackling local housing issues, though we find the lack of depth in the strategy concerning. We appreciate the difficulties of bringing together disparate approaches from seven housing authorities with a range of policies and strategies and differing ways of planning for administering social housing and planning for new housing developments.

Our underlying concern is that the issue of housing volume and quality may be seen as being paramount and the consequence may, therefore, be that the sector is starved of the resources to be able to adequately address the existential threat of climate change. Reducing the use of energy generally and the phasing out of fossil fuels should be a major driving force in all the work the Council undertakes. It should be noted that this approach is entirely consistent with raising housing quality.

Promising initial steps were underway locally by the former Harrogate Borough Council, and we would hope that the best of this will be used to inform the emerging strategy (alongside the best of practice elsewhere). It would not be acceptable for good practice to be lost at this this critical stage in the climate emergency.

The draft Strategy contains no timeline, programme, costs or financial budget to start to tackle the major problems we face in preparing the local housing stock for a zero-carbon future. This is at odds with the UN call for urgency and for action "on all fronts - everything, everywhere, all at once"¹. When we compare the document with the parallel strategy for Leeds, we consider that North Yorkshire is at least three years behind the work of the City Council on the subject of decarbonisation. Commitment, resources and pace are required to play catch-up in this important area.

Detailed comments

Missing elements of the strategy

We are disappointed to note that the draft strategy contains little in the way of quantitative analysis of the energy needs of the local housing stock, the sorts of energy required and pathway that is compatible with the national target of achieving net zero by 2050. Nor is there any assessment of the challenges set by the Council's own aspirations of a net zero target by 2030 for its own operational carbon emissions, which we assume also applies to the housing stock owned by the Council. We would urge the Council to make up for lost time in undertaking this set of analyses, so that a clear pathway for carbon reduction can be set and costed programmes put in place to deliver these outcomes.

¹ United Nations Secretary-General's press conference to launch the Synthesis Report of the Intergovernmental Panel on Climate Change, 20 March 2023, <https://www.un.org/sg/en/content/sg/statement/2023-03-20/secretary-generals-video-message-for-press-conference-launch-the-synthesis-report-of-the-intergovernmental-panel-climate-change>

Zero Carbon Harrogate

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There is, furthermore, no commitment to terminate the building of housing that is not net zero compliant. Whilst achievement of net zero housing will rely heavily on the decarbonisation of the electricity grid, it is entirely possible to build to energy use standards and incorporate energy generation into new build projects that allow net zero housing to become achievable. This requires designing and constructing to high standards and eliminating the use of fossil fuels for home space and hot water heating. This approach also helps in the elimination of fuel poverty and thus addresses social as well as environmental policies.

In our view this cannot wait for the development and approval of a new Local Plan. We consider that adopted national and local policies are sufficiently advanced to put in place a Supplementary Planning Document (SPD) which would, amongst other things, address the issue of new build housing standards.

However, our prime concern is the lack of ambition and urgency in this draft strategy. The housing sector faces varied challenging issues, not least of which is the requirement to decarbonise. The draft strategy appears to be content to deliver surveys and plans, but fails to commit the large scale (and inevitably expensive) action that will be required over the period ahead to bring housing quality and volume up to the standards required for a net zero future. A clear, long-term commitment to net zero new builds and retrofitting is essential to provide a stable environment for the sector to invest in the necessary skills to transition locally.

New build standards (section 5.2)

All housing new build (and indeed non-residential new build) should be specified to deliver net zero operational carbon and also seek to minimise embodied carbon. We regard the Council's aspirations of meeting 'EPC C as a minimum' is both inadequate and shows misplaced reliance on EPC ratings. Nor do we believe that it is sufficient to be 'working towards the Future Homes Standard'. Energy Performance Certificate ratings are increasing being demonstrated as being inappropriate for the task of steering us towards a Net Zero future. We would point you towards numerous other local authorities who have adopted, or are in the process of adopting, building design and certification standards that are compatible with the internationally accepted and long-proven Passivhaus standard, including Leeds City Council.

Whilst we applaud your proposal to support 'our Registered Provider partners to meet net zero carbon ambitions', we would ask you to be more specific as to the form and substance of the support you intend to provide.



Address stock condition issues, improving poor quality housing in all tenures (section 5.3)

We agree with much of this section but consider that it lacks ambition. We note that the section promises 'working with the Mayoral Combined Authority to deliver the Carbon Abatement Pathway', but this indicates many months of inactivity until the Combined Authority becomes established, sets its own priorities, and develops the capacity to rise to this major challenge. It also indicates a lack of clarity as to how the complementary roles of the new Combined Authority and the Local Housing Authority will operate.

Whilst we agree with the proposals to produce 'a private housing stock condition baseline and a retrofit action plan to inform future investment', that only sets out the first stage in a process of addressing the poor conditions it will inevitably highlight. There should be many pilot retrofit action plans in place now that will provide initial experience of the problems, inform how the detailed challenges that the plan will be addressed and inform the standards, costings and funding issues covered by the plan.

We would urge the Council to look further ahead in this strategy so that resources can be put in place and action undertaken as soon as the strategy is adopted.

Concluding remarks

As with all consultation responses we submit, we have no desire to criticise from the side lines. We are active players in working to decarbonise housing locally, and we are pleased to have the opportunity to put our expertise and experience at the Council's disposal. Our desire is to help the process of mutual learning and we wish to engage in further dialogue with housing, as well as climate change, officers and members to contribute to the future effectiveness of the Council.

Zero Carbon Harrogate
December 2023

Submitted via: letstalk@northyorks.gov.uk

Response to North Yorkshire Housing Allocations Policy

The huge area and significant population covered by North Yorkshire Council represent major challenges for producing coherent housing strategies and policies.

That does not, however, excuse the lack of meaningful data from both the draft Housing Strategy and the draft Allocations Policy.

There are seven major issues of concern:

1. Is a bidding system appropriate?

1. What consideration has been given to whether a so-called 'choice based' system that requires applicants to bid through an IT systems is appropriate to current circumstances? It must consume a great deal of time and emotional energy for applicants and the number instances were direct offers and 'overlooks' of 'successful' bids that the Draft Policy allows is strongly suggestive that it is neither efficient nor effective.

2. Housing debt

1. Rent arrears and housing debt feature prominently as a reason for not accepting someone onto the Housing Register or for not allocating a property. Given the problems of housing affordability, the rises in mortgage and private rents, the impact of second homes & holiday lets, the limitations of Local Housing Allowance and the behaviour of some private sector landlords, this needs to be revisited.
2. There is insufficient attention to rent arrears / housing debt arising from joint tenancies in instances of domestic violence or other relationship breakdown.

3. Locality and local connections

1. The Draft Allocation Policy does not have sufficient regard to the vast geographic area covered by NYC and the differing 'housing markets' within it. It is absurd to suggest that someone not resident in NY but who can show a local connection to someone in Ravenseat should qualify to be housed in Shipton or Hunmanby.
2. Similarly, the restriction of 'local lettings policies' (unspecified) to specific parishes is not appropriate - people living in adjacent or nearby parishes should have preference over people living elsewhere in North Yorkshire.

4. Homeowners & 'Sufficient financial resources'

1. The Draft Housing Strategy features 'meeting the needs of our ageing population' and the reference in the Draft Allocations Policy on homeowners having access to the Housing Register only in 'exceptional circumstances', strongly suggests that urgent work is required to develop appropriate policies. It is necessary to be creative in finding ways to address the needs of elderly or disabled homeowners who can no longer continue in their own homes but have a capital asset that cannot be immediately realised (and which should be taken into account when allocating publicly funded resources).
2. What is the basis for the statement that people with savings or capital (presumably in the form of property assets) of £60,000 can resolve their own housing needs? A woman who gave up work to care for children or an elderly / disabled relative could be entitled to such a sum from a divorce settlement or inheritance but have insufficient earnings capacity. How does this apply to someone fleeing a violent relationship or someone other than a member of the Armed Forces with a lump sum payment for an injury?

5. Adapted properties

1. Even if a bidding system is considered to be generally appropriate, is it really appropriate for people who need to move due to disability or infirmity or for properties that have been adapted for physical disabilities?
2. As a Unitary Authority with statutory responsibilities for adult care and housing, surely NYC can do better than this?

6. Children's welfare

1. There is insufficient attention given in the Draft Allocations Policy to the welfare of children. The need not to disrupt a child's schooling should be incorporated into the policy as should the fact that it is highly undesirable to require families to move twice (or more frequently) as children reach the age of 10 or 16.
2. As with Adult Social Care, NYC is now a Unitary Authority and should be able to integrate its policies and services better than this.

7. Transparency & accountability

1. There is a woeful lack of relevant information in the public domain about housing needs, how housing policies are applied and the operation of the current Partnership. There should be clear requirements for effective monitoring and information to be published.
2. The Draft Housing Allocations Policy does not appear to comply with the requirement of Section 166A of the 1996 Act that 'Every local housing authority in England must have a scheme (their "allocation scheme") for determining priorities, and as to the procedure to be followed, in allocating housing accommodation. For this purpose "procedure" includes all aspects of the allocation process, including the persons or descriptions of persons by whom decisions are taken.' In the context of the Partnership, it is particularly important to know whether decision makers are staff of NYC or a HA and their job titles.
3. Furthermore, it is difficult to see how the Draft Allocations Policy has been prepared having '...regard to— (a) their current homelessness strategy under section 1 of the Homelessness Act 2002, (b) their current tenancy strategy under section 150 of the Localism Act 2011...' as required by the Act. It refers to none of the strategies of the former District Councils nor any other relevant information.

Detailed comments.

Paragraph	Comment
1.2 1st para	Statements that NY ' <i>is an area of high demand for social housing</i> ' and that there ' <i>is also a substantial level of homelessness</i> ' should be quantified and put into context. Where and how is demand and homelessness manifest? To which 'district' does this refer?
1.2 4th para	How are HAs 'encouraged' to advertise vacant properties? What happens if a HA declines? Where are nomination agreements published, who monitors them and where are the results of monitoring reported?

1.3	<p>How sad that a local authority feels it necessary to state that it will act within the law.</p> <p>3rd bullet point - to which 'district' does this refer'?</p> <p>4th bullet point - what is meant by '<i>effective use of available social housing stock</i>'? What evidence is there of demand for '<i>greater choice by extending mobility</i>' across 3,000sq miles?</p> <p>6th bullet point - how does allowing applicants to '<i>express choice</i>' compatible with the realistic statement in para 1.2 '<i>this does not guarantee that they will ever be made an offer of accommodation</i>'?</p> <p>7th bullet point - advertising does not, of itself, give applicants '<i>informed and realistic choices</i>'.</p> <p>10th bullet point - what assessment has been made of whether the people who most required to use the system (i.e. those in greatest housing need) find an IT-based bidding system accessible and easy to use? How does NYC discharge it's duty to provide free assistance in making an application to those who may have difficulty doing so?</p>
1.4	<p>More information is required about how NYC + 3 Housing Associations will '<i>monitor</i>' the scheme. The quarterly statistics currently published by the partnership are inadequate and require greater interrogation with an accompanying commentary. For example XXXXXXXXXX</p>
1.5	<p>1st para - It would be helpful for the definition of '<i>urgent housing need</i>' to be included in the Policy rather than requiring the reader to refer to the legislation.</p> <p>2nd para - the statement '<i>Applicants will be considered for all social housing vacancies.</i>' is inaccurate and seriously misleading given the bidding and banding systems.</p>
1.9	<p>2nd para - but it is the case that some people will be treated <u>more favourably</u> than others in the allocation of housing as a result of having a protected characteristic.</p>
1.1	<p>1st para - the Allocations Policy must include (and specify) any local lettings policies.</p> <p>2nd para - by whom, when and how will local lettings policies be '<i>approved</i>'?</p> <p>3rd para - what does this mean?</p> <p>4th para - only 1 local letting policy is on the website</p>
1.11	<p>How are 'sensitive lets' monitored and reported?</p>
2.1	<p>This reflects the law but will be largely unintelligible to most readers. A simplified statement should be provided with the legislative detail in an appendix.</p> <p>What proof do people have to provide that they do have recourse to public funds?</p>
2.2.1	<p>1st para</p> <p>1st bullet point (2) As NYC is now a Unitary Authority it should have no difficulty in ensuring that looked after children / care leavers have appropriate support packages. How will this be monitored and reported?</p> <p>bullet points - many of these points involve value judgements e.g. '<i>unacceptable</i>', '<i>knowingly</i>', '<i>deliberately</i>', '<i>suitable</i>', the Policy should state who will be making these judgements, how they will be monitored and to have a clear and speedy appeal mechanism.</p> <p>8th bullet point - unintelligible, to whom does the third 'who' refer? How does this affect applicants who are 'sofa surfing'?</p> <p>14th bullet point - is this putting administrative convenience above applicant choice?</p> <p>15th bullet point - this creates a 'Catch 22' - how are such people to be housed, who decides what is '<i>appropriate</i>' support, what support are HAs expected to provide?</p>

2.2.1	2nd & 3rd paras - the ' <i>certain defined circumstances</i> ' should be specified in the Policy together with who can disapply the criteria together with how disapplications will monitored and reported.
2.3	3rd bullet point - how is ' <i>casual</i> ' work defined? Given the prevalence of the 'gig economy' is this unduly harsh? 5th bullet point - what is the basis for specifying 5 years?
2.3.1	4th & 5th bullet points - Should be qualified by additional requirement to have local employment or children. why limit to death attributable to service? Where children are involved this is unduly harsh. Final para - how will this be monitored and reported? Why restrict the local area of choice.
2.4	1st para - as above, ' <i>or reside with a household member who is a homeowner</i> ' is unintelligible.
2.5	' <i>Capital</i> ' needs to be defined - does it include assets such as a share in a property that could be sold?
2.6	3rd para - what does ' <i>found to</i> ' mean? A conviction? In which case is it appropriate to provide an appeal? A decision by an official? In which case how monitored and reported?
2.7	Who decides on ' <i>deliberately</i> '? How will these decisions be monitored and reported?
2.8	There is an implication that applicants are bidding for properties that they do not want? Is there any evidence of this? Who decides if an offer is ' <i>unreasonable</i> ' and how are such decisions monitored and reported?
Section 3	1st para - what advice and guidance does NYC provide on ' <i>other housing options that may help improve their housing situation.</i> '?
3.2	How does this work in practice for an overcrowded family with adult children who would accept <u>either</u> being housed together <u>or</u> with one or more adult children housed separately to the rest of the family but nearby, or for a family with one or more members needing adapted accommodation when together or separate but nearby would need their needs?
3.8.1	1st & 3rd paras - these are not consistent. The Policy should be definite about what applicants will be required to verify and when.
3.8.2	4 weeks is a long time for a purely administrative process. What is the basis for this timescale?
3.9	How does this fit with Housing Strategy comments that purpose-built elderly accommodation is proving difficult-to-let and may no longer be fit-for-purpose? 4th para - what arrangements have been / will be made to make the process of applying for extra care facilities as easy and as seamless as possible?
3.10	Who decides the 'best match'? This section reflects poorly on NYC as a Unitary Authority which should be capable of offering an integrated service to disabled people. Information should be published on how many applicants require an adapted property, how many adapted properties have become available to let and how many such properties have been let to people not requiring an adaptation.
3.11	A list of such properties should be appended to the Policy and updated regularly (no less than quarterly).
3.12	When will the Tenancy Policy be published?

3.14	2nd para, 1st sentence - why choose date of notification? Who, if anyone, does this disadvantage? 2nd para, 2nd sentence - meaning is unclear.
3.15	The operation of banding reviews should be monitored and information published regularly. In a supposed 'choice based' allocation scheme why incorporate the ability to punish applicants who exercise their choice to wait longer for a property that they want?
3.17	The review procedure should be an integral part of the Policy.
4.1	It would be helpful to include definitions (or at least indications) of what counts as ' <i>unsatisfactory housing conditions</i> ' and ' <i>need to move</i> '.
4.2	3rd para - important to enable fostering and adoptions but seems very 'loose'.
4.3	The operation of the banding system should be subject to monitoring with information published and reported to NYC about the number of applicants (new and accepted) qualifying under each criterion and the number of those applicants offered tenancies.
4.3	2nd para - to what may a time limit be applied and by whom? What is the difference between the two bullet points? Reflects poorly on NYC as a Unitary Authority that joint assessments are not standard practice. It is barely credible that there were only 3 such cases in July 2023 and 1 in October 2023.
4.3	4th para - 3rd bullet point - In what circumstances do NYC and/or a partner HA own property that is ' <i>not from or returned to general housing stock</i> '? 3rd & 4th bullet points - How and why has ' <i>two</i> ' fewer or more bedrooms been selected? 8th bullet point - how is ' <i>specific locality</i> ' defined? 9th bullet point - what about Prohibition notices served by other statutory services?
4.3	4th para 1st bullet point - assessed by whom? 5th bullet point - as above re property not from or returned to housing stock. 8th bullet point - what does ' <i>applicants can only bid in the area the local authority operates</i> ' mean, which 'local authority'?
5.1	As with other sections, there should be proper monitoring and public reporting of how this works.
5.1	1st para - the distinction between partner, participating and associated landlords should be stated. The number of properties advertised by each type of housing provider should be published regularly (monthly). 2nd para - if this means that the 'advertisement' contains this detail the sentence should be reworded for clarity. As drafted it can be interpreted as each applicant being personally advised.
5.1	3rd para, 4th bullet point - this is far too loose, there are many rural settlements that adjoin each other and/or larger centres of population where people still have a 'local connection' beyond the immediate parish. Local connections needs careful thought and clearer definition. 5th para - the number and reasons for withdrawal should be monitored and publicly reported.

5.2	<p>Who decides whether a property will not be advertised? The number of such properties and the reasons should be monitored and publicly reported.</p> <p>1st bullet point - why use the term '<i>where the local authority have reason to believe</i>' surely the test of priority need is clear?</p> <p>4th bullet point - who decides whether the nature of the harassment is sufficient, whether there are no other ways of resolving, whether violence is '<i>likely to be enacted</i>'? The cumulative nature of these criteria mean that many victims of domestic violence could be left at serious risk - ref the number of cases of women who contacted the police and were subsequently murdered. The number of such cases should be monitored and publicly reported.</p> <p>6th bullet point - the meaning of this is not clear.</p>
5.2	<p>2nd para - '<i>appropriate and suitable</i>' in whose view?</p> <p>What does the 2nd sentence mean?</p> <p>What is the appeal mechanism?</p> <p>3rd para - the information reported to the Partnership Board should be published.</p>
5.3	<p>3rd para - this is the first mention of 'auto bids'.</p> <p>4th para - what does '<i>applicants matched to a property mean</i>'?</p>
5.4	<p>1st para - Ranked by whom and how?</p> <p>2nd para - This seems a nonsensical way of expressing the point - either an applicant qualifies or does not and if not there should be no question of a tie-break.</p>
5.5	<p>3rd para - people who are seeking to leave an abusive relationship should not be disadvantaged by housing debt.</p>
5.6	<p>1st para - Why in a 'choice based' system is an applicant able to be only considered for one property?</p> <p>2nd para - 24 hours to respond is unreasonable. There should be an agreed and consistent timescale in which applicants are expected to view and reach a decision.</p> <p>3rd para - 24 hours is not reasonable when a move would affect children's schooling.</p> <p>4th para - There should be an agreed and consistent timescale in which applicants are expected to provide information.</p> <p>The number of property offers that are made, the time between offer and letting, the number withdrawn and the reasons should be monitored (including by provider) and information published.</p>
6.1	<p>1st para, 1st bullet point - what does '<i>affordability will be considered</i>' mean?</p> <p>4th bullet point - why restrict 'choice' in this way - administrative convenience over tenants choice?</p> <p>5th bullet point - how does this impact on people affected by domestic violence / former joint tenancies?</p>
6.1	<p>2nd para - '<i>senior housing officer</i>' employed by whom? How is exercise of this discretion monitored and reported?</p>
6.3	<p>A return to the concept of the 'deserving' and 'undeserving' poor!</p>

Appendix 2	<p>1st para - '<i>or a member of their household</i>' how did this fare in the the equality & diversity impact assessment in relation to the protected characteristic of sex?</p> <p>2nd para - the 8th paragraph needs to go here otherwise it could appear that a woman fleeing domestic violence would not be rehoused on grounds of the behaviour of her partner.</p> <p>3rd para - little more than guessing - not appropriate in a policy.</p> <p>5th para - how does the Partnership ensure this? How is the process monitored and reported?</p> <p>7th para - who decides when it is '<i>appropriate</i>' to request references?</p> <p>8th para - who judges whether applicant is '<i>guilty</i>' of unacceptable behaviour?</p> <p>9th para - the review procedure is not set out at 3.18, it should be appended to the Allocations Policy</p> <p>11th para - how is this monitored and reported?</p> <p>12th para - '<i>has been guilty of</i>' does this mean convicted by a Court? If not, it is inappropriate language.</p>
Appendix 3	<p>What is the logic of placing people who are intentionally homeless and those not in priority need in the silver banding?</p>
Appendix 4	<p>Which '<i>allocations staff</i>'? See general comments about debt.</p> <p>It is difficult to see how many of these exceptions could arise in an effective allocations scheme.</p> <p>Point 15 - '<i>professionally assessed</i>' by whom?</p>
Appendix 5	<p>5.1 - the impact on children's education and well-being needs more consideration. It is unreasonable to expect families to have to apply, bid for and move to a different property when a child/children reach the age of 10.</p> <p>4th para - what does this mean?</p>
Appendix 5	<p>5.2 - what evidence is required of '<i>continuing need for care...for the foreseeable future</i>'? Why is a partner of a person needing care not afforded the dignity of a bedroom (with the respite that would bring)?</p>
Appendix 5	<p>5.7 - who decides whether an adult household member has a '<i>demonstrable need</i>' to live with an applicant? What counts as a 'need'?</p>
Appendix 6	<p>The table is not sufficiently detailed as it omits age and sex of children.</p> <p>5th para - when does the '<i>financial assessment</i>' take place? The number of applicants refused access to a larger property on financial grounds should be monitored and reported (annually).</p> <p>6th para - what is the point of limiting a re-application to a property of '<i>an assessed suitable size</i>' if none are available? Moving between an 'open plan' living area to a property with a dining room could alleviate bedroom shortage but not meet assessed bedroom need.</p>