
Planning Policy and Local Plan Advisory Group**13 October 2026****Report of the Head of Strategic Planning Policy****Local Plan Housing Needs Evidence Base****Summary**

1. This briefing sets out the housing needs evidence proposed to support the preparation of the Local Plan as one of the core themes the plan will need to address.
2. Assessing housing needs is a fundamental part of preparing a new Local Plan because it provides the evidence needed to understand how many homes are required, what types and sizes of homes are needed, where they may be needed and which groups have particular housing requirements. This includes considering the needs of different households, such as families, older people, people with disabilities, students and those requiring affordable or specialist housing. A robust assessment helps the Council translate population, household and economic changes into appropriate planning policies and site requirements, ensuring that future development responds to local needs rather than simply delivering an overall number of homes. It also provides an important evidence base for considering affordable housing requirements, housing mix and specialist provision, and helps demonstrate that the Local Plan is positively prepared, justified and capable of meeting identified needs over the plan period.
3. It is therefore necessary to ensure we have both a citywide and more granular understanding of the city's housing needs. We intend to prepare a Local Housing Needs Assessment and more detailed assessment for specialist housing needs. The Housing Team have already undertaken work on Strategic Housing Needs Assessment for people with learning disabilities and Autistic people (Annex A).

Recommendations

4. The committee is asked to:

- i. Note the proposed programme of housing needs evidence to support preparation of the new Local Plan, including the commissioning of a Local Housing Needs Assessment and Supported Housing Needs Assessment.
 - ii. Provide views on the scope and key issues to be addressed through the housing needs evidence base.
5. Support the use of the Strategic Housing Needs Assessment for people with learning disabilities and autistic people (Annex A) as part of the Council's housing evidence base, pending the completion of the wider Supported Housing Needs Assessment and Strategy.

Reason: To provide a robust evidence base to support the implementation of Local Plan policies and inform decision making on relevant planning applications relating to supported housing provision

Background

Policy background

National Planning Policy Framework (NPPF)

6. The [NPPF](#) explicitly sets out the following requirements for local plans with regards to housing. The NPPF is clear that, beyond these requirements, policies should only be included in local plans where they **support the delivery of specific allocated sites** or **address a particular local issue** where there is a clear and justified reason for their inclusion.
7. The plan making policies are H01-H06:
 - HO1: Assessing the need for homes
 - HO2: Setting requirement figures for homes
 - HO3: Providing land for homes
 - HO4: Land for strategic site development
 - HO5: Meeting the needs of different groups
 - HO6: Planning for a diverse mix of sites
8. NPPF Policy HO1 'Assessing the need for homes' sets out the evidence based expectations for meeting housing needs; this includes

- a) A housing need assessment that establishes the overall number of homes needed in the area as a minimum over the plan period, using the standard method in [Annex D](#);
 - b) An assessment of the permanent and transit site accommodation needs of travellers in the area as a minimum over the plan period; and
 - c) An understanding of any accommodation needs that cannot be met within neighbouring areas.
9. Policy H01 explicitly identifies the following groups the evidence needs to consider/ plan for. Importantly, the NPPF says these groups “include, but are not limited to” this list, so an assessment can identify additional locally important groups or accommodation needs.
- People who require affordable housing, including Social Rent.
 - Older people, including those requiring:
 - retirement housing;
 - housing-with-care; and
 - care homes.
 - Disabled people.
 - People who rent their homes.
 - Families with children.
 - Looked after children, and people requiring other specialist community-based accommodation.
 - Students.
 - Travellers.
 - People wishing to commission or build their own homes, i.e. self-build and custom-build housing.
10. Overall these policies require the Plan to establish the overall level of housing need and assess the size, type and tenure of homes and accommodation required by different groups; translate this evidence into housing, pitch and plot requirements; and identify sufficient deliverable and developable land to meet these requirements over the plan period. The policies also require the Plan to consider suitable locations for strategic housing-led development and ensure that the needs of different groups are addressed, including through affordable and Social Rent housing, accessible and adaptable homes, specialist housing, student accommodation, self and custom-build housing, and Traveller accommodation. In identifying its housing supply, the Plan should provide a diverse mix of sites, including small and medium-sized sites, and support appropriate housing growth in rural communities.

11. For affordable housing, we must also:

- Identify the contributions expected from development towards meeting affordable housing requirements.
- Clearly set out circumstances where viability review mechanisms will be required for affordable housing.
- Set requirements for the type and mix of affordable housing, and specific affordable housing requirements on green belt sites.

Regional Strategy

12. The NPPF requires that the Spatial Development Strategy (SDS) should establish the housing requirement and set pitch and plot requirements where a need has been identified, for each local planning authority within the strategy area. These do not need to be retested as part of the Local Plan process unless there is a specific change in circumstances, which affects the requirement or its distribution.
13. Officers continue to work with the York and North Yorkshire Combined Authority (YNYCA) in relation to the development of the SDS. It expected that further information and enactment of secondary legislation to support its development will be made available soon.
14. The YNYCA have also adopted its Housing Growth Strategy on 1 May 2026, which will form part of the new Local Plan's evidence base and inform the SDS directly. This seeks to plan for 60,000 homes across the region, within 25,000 as affordable homes. It lays out plans for accelerating housing development and increasing the supply of affordable housing through collaboration with Homes England, YNYHP, the region's two local authorities, housing associations and homebuilders.
15. Additionally, the YNYCA are producing a Housing Retrofit Strategy, which could be endorsed by CYC for use in the future.

Local Strategy

16. The council is a Housing Authority as well a Planning Authority meaning that we have a further statutory duty to meet the needs of residents. A major strategic priority is increasing the delivery of affordable housing, with an anticipated emphasis on social rented homes in response to Government priorities. This will require alignment between planning policy, development management decisions, registered provider partnerships and the Council's own housing delivery programme. The Council also recognises the need to respond more effectively to

increasingly complex housing and homelessness issues through stronger partnerships and integrated services spanning mental health, learning disabilities, employability and other support needs.

17. A number of housing strategies are already in place or under development. Relevant for planning include the approved Homelessness and Rough Sleeping Strategy 2024-29 and the development of an overarching Housing Strategy and a Supported Housing Strategy. Together, these strategies provide the framework for delivering the Council's housing ambitions and supporting future Local Plan objectives.

Evidence Base Commissioning

Local Housing Needs Assessment (LHNA)

18. To support and ensure we balance the needs of residents and future development, the latest housing needs assessment (2022) identified that:
 - The focus of new housing provision should be on two and three bed properties reflecting the demand for family housing and the demand from older persons wishing to downsize.
 - There is a substantial need for affordable housing, and the council is therefore justified in seeking to secure as much affordable housing as viability allows.
 - There is a clear need for additional specialist housing for older people, including supported housing, extra care housing and care homes.
 - There is a clear need to increase the supply of accessible and adaptable dwellings.
19. This evidence needs to be updated to reflect changing pressures and demographics as well updated policy requirements set out in the NPPF (as set out above).
20. To this end we have commissioned a new Local Housing Needs Assessment that will provide up-to-date evidence of need for all types and tenures of housing. It will align the NPPF 2026 ensuring robust evidence for both plan-making and decisions within the adopted Local Plan.

Supported Housing Needs Assessment

21. In order to comply with our statutory duty¹, local authorities must publish a strategy that assesses the current availability of supported housing within each district, and project the likely need for supported housing during the 5 years from the date the strategy is published. Statutory guidance sets the expectation that councils will understand current supply, unmet need and future demand and collaborate across housing, health and social care.
22. The needs assessment must be comprehensively carried out every 5 years. We are currently tendering for consultancy support to help produce the needs assessment, which will provide the core evidence base for the Strategy. Following this, it is anticipated that the first strategy will be published by the 31 March 2027.
23. The scope of this needs assessment includes the following cohorts of people:
 - learning disability
 - autism
 - mental health
 - physical and sensory impairments
 - older people
 - domestic abuse
 - homelessness/rough sleeping incorporating analysis of people who face homelessness due to a protected characteristic
 - substance use
 - justice pathways
 - care leavers and other vulnerable young people age 16-25
 - multiple & complex needs
24. The assessment will also consider the following provision types: supported housing, extra care, supported living, refuges, managed properties, LA hostels, Housing First and time-limited accommodation where relevant.

Strategic Housing Needs Assessment for people with learning disabilities and Autistic people

25. In July 2024, consultants, Housing LIN, completed an assessment of housing and accommodation needs for people with learning disabilities and autistic people, covering both the City of York and North Yorkshire.

¹ The Supported Housing (Regulatory Oversight) Act 2023

26. The needs assessment is intended to give an evidence base to allow the Council to make future long term planning decisions to meet the needs of people with learning disabilities and or Autistic people. This assessment includes estimates of supported accommodation needed over the next 10-15 years to 2039.
27. The assessment estimates the number of supported housing and accommodation units required, property types and the housing/accommodation models required to meet the estimated housing need.
28. The focus of this housing need assessment is people with learning disabilities and/or autistic people who are or are likely to be eligible for social care and/or health services from the Councils and/or the Integrated Care Board. However, the assessment also considers the potential housing needs of people with learning disabilities and/or Autistic people who fall outside of eligibility for adult social care.
29. Estimates of need for supported accommodation and housing, include young people aged 18-24 years and adults aged 25+. These estimates also take account of the future need for supported accommodation amongst people who are currently children as the population change to 2039 takes account of children becoming eligible for adult social care over that period.
30. The forecast need for City of York is:
 - an additional c.35 units of supported housing and c.5 shared lives places are needed by 2029;
 - an additional c.70 units of supported housing and c.7 shared lives places are needed by 2034;
 - an additional c.110 units of supported housing and c.10 shared lives places are needed by 2039.
31. This report has already been endorsed by North Yorkshire Council and forms part of their supported housing evidence base.

Gypsy and Traveller and Travelling Showpeople Needs Assessment

32. The latest Gypsy and Traveller Needs Assessment was undertaken in 2022 and updated in 2024. The definition for Gypsies and Travellers at this time stated that households that do not travel and have not ever

travelled for work purposes fall outside the planning definition of a Traveller. Consequently, this assessment identified a need for:

- 12 pitches to meet the planning definition
- 26 pitches to meet requirements for those who do not meet the planning definition.

33. For Travelling Showpeople, previous evidence supported a need of 3 additional plots to meet the planning definition need.
34. The new NPPF has incorporated the former 'Planning Policy for Travellers (2023)' into the national policy requirements so they can be read alongside other housing requirements.
35. The NPPF requires the Local Plan to plan positively for the accommodation needs of Gypsies, Travellers and Travelling Showpeople. This includes assessing the need for permanent and transit accommodation, establishing pitch and plot requirements based on that evidence, and identifying sufficient land to meet those requirements as fully as possible over the plan period. Where a need is identified, the Plan should also identify suitable sites for Gypsies, Travellers and Travelling Showpeople, including where appropriate sites capable of accommodating mixed residential and business uses.
36. It is intended that our needs evidence is refreshed to support policy development and spatial planning for pitches and plots in the new Local Plan.

Consultation

37. Technical officers within the council will feed into the preparation of the draft evidence base commissions. Where appropriate, consultation will be held with external stakeholders to feed into the evidence base development.
38. Outcomes from the papers will be brought to PPLPAG for consideration prior to endorsement through an Executive Member Decision Session.
39. The Strategic Housing Needs Assessment for people with learning disabilities and Autistic people development exercise incorporated feedback and engagement from technical officers in the Housing service and within Adult Social Care. The final report and conclusions have also been reviewed by officers across the council as part of the

development of a supported housing strategy for the council during 2026/27.

Options

40. The following options have been considered as part of this report.

Option 1: Support the proposed approach to developing the housing evidence base and the use of the existing Strategic Housing Needs Assessment for people with learning difficulties and autism.

41. Members could support the proposed programme of evidence gathering, including the commissioning of the Local Housing Needs Assessment and Supported Housing Needs Assessment, and support the Housing LIN Strategic Housing Needs Assessment for people with learning disabilities and autistic people being used as part of the evidence base for the Local Plan and relevant planning guidance and decision-making. The Housing LIN assessment would subsequently be supplemented or updated by the wider Supported Housing Needs Assessment and Strategy expected during 2027.

Option 2: Support the proposed approach, subject to additional or amended evidence requirements

42. Members could support the overall approach but identify additional housing needs, groups or issues that they consider should receive particular attention through the Local Housing Needs Assessment or other evidence. This could, for example, relate to affordable and Social Rent housing, older people's housing, accessible and adaptable homes, family housing, private rented housing, student accommodation, self and custom-build housing, or other specialist housing needs.

Option 3: Do not support the Strategic Housing Needs Assessment people with learning difficulties and autism for being used as part of the Local Plan evidence base at this stage

43. Members could consider that the existing Housing LIN assessment should not be formally relied upon as part of the Local Plan evidence base and that the Council should instead await the completion of the wider Supported Housing Needs Assessment and Strategy during 2027. This would provide a more up-to-date and comprehensive assessment, but in the interim would mean that decisions relating to the housing needs of people with learning disabilities and autistic people would have less current, locally specific evidence available to inform them.

Analysis

44. **Option 1 is recommended.** This would enable the Council to make use of the best available evidence now, while recognising that the evidence base will continue to develop as the new Local Plan progresses. It does not commit the Council to particular development proposals or future expenditure and allows the existing assessment to be reviewed alongside the wider Supported Housing Needs Assessment when that work is completed.

Council Plan and Strategies

45. The preparation of the housing evidence base supports the Council Plan 2023–27 priorities of equalities and human rights, affordability and health.
46. Evidence endorsed prior to the adoption of the new Local Plan can also influence decision-making under policy H3 ‘Balancing the housing market’ within the adopted Local Plan (2025). This policy allows for ‘*the latest Local Housing Needs Assessment (LHNA) and in any other appropriate local evidence*’ to be considered.

Implications

47. **Financial** – The commissioning of evidence has been costed into the overall project budget for the preparation of the Local Plan with the Strategic Planning Policy. The Supported Housing Needs Evidence is being commissioned within the Housing Team to meet statutory requirements.
48. **Human Resources (HR)** – There are no HR implications.
49. **Equalities** – There are clear overlaps with characteristics and Human Right considerations set out in our Human Rights and Equalities Impact Assessment. It is intended that we will produce a HREA for each theme incorporated into the Local Plan to ensure these matters are duly considered. A HREA will also be produced to accompany decisions taken to Executive Member Decision Session
50. **Legal** – Evidence should meet the provisions as required set out in the Town and Country Planning (Local Planning) (England) Regulations 2026, the National Planning Policy Framework and associated planning

guidance and the Supported Housing (Regulatory Oversight) Act 2023. Evidence when produced will have material weight in decision-making.

- 51. **Crime and Disorder** – There are no implications for crime and disorder.
- 52. **Information Technology (IT)** – There are no IT implications other than publishing on the City of York Council website.
- 53. **Property** – there are no implications for Property
- 54. **Other** – there are no implications for other areas.

Risk Management

- 55. There are no significant risks associated with the proposed approach. Maintaining a robust and up-to-date housing evidence base will reduce the risk that the new Local Plan does not adequately identify and respond to the housing and accommodation needs of the city's different communities. The evidence will inform the development of future policies but does not commit the Council to particular policy requirements, site allocations, development proposals or future expenditure. There is a risk that housing needs and national or regional planning requirements change during preparation of the Plan; this will be managed by keeping the evidence under review and updating or supplementing it where necessary.
- 56. The Housing assessment provides locally specific evidence that can be used in the interim and will be reviewed alongside the wider Supported Housing Needs Assessment and Strategy when completed. There is a some risk associated with not adopting the assessment, as non-statutory planning guidance and planning decisions relating to supported housing for people with learning disabilities and autistic people may be information by less comprehensive or less up-to-date evidence.

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Background Papers:

- [Local Housing Needs Assessment July 2022](#)
- [Gypsy and Traveller Accommodation Assessment June 2022](#)
- [Gypsy and Traveller Accommodation Assessment Review February 2024](#)

Annexes

Annex A: Strategic Housing Needs Assessment for Learning Disabilities and Autism

Abbreviations

NPPF – National Planning Policy Framework.
PPLPAG – Planning Policy and Local Plan Advisory Group
SDS – Spatial Development Strategy
YNYCA – York and North Yorkshire Combined Authority