



Local Plan Proposed Modifications Consultation
June 2019:

Volume 3 of 4 - Responses PM SID 394 to 620

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From: Paul Butler [REDACTED]
Sent: 22 July 2019 21:41
To: localplan@york.gov.uk
Cc: [REDACTED]
Subject: YORK LOCAL PLAN - PROPOSED MODIFICATIONS CONSULTATION - TERRY'S CAR PARK - SUPPORT FOR SITE REFERENCE ST16
Attachments: City of York Local Plan - ST16 - Terry's Car Park - McCarthy & Stone - Form - July 2019.pdf; City of York Local Plan - ST16 - Terry's Car Park - McCarthy & Stone - July 2019.pdf
Follow Up Flag: Follow up
Flag Status: Completed

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir or Madam,

We write on behalf of our clients McCarthy & Stone to provide City of York Council (CYC) with their representations to CYC's Proposed Modifications to the York Local Plan (June 2019).

Please find enclosed our representations to the Proposed Modifications consultation.

McCarthy & Stone **support** CYC's identification of the Terry's Car Park site as a proposed housing allocation within the emerging City of York Local Plan. Whilst the site's allocation is supported, we believe changes are required to the site specific policy criteria to reflect recent pre-application discussions between McCarthy & Stone and CYC. The changes we request will allow for the development of the site to maximise the delivery of much needed homes for older people in the City.

Should you require any further details or clarification on the content of the enclosed representations please do not hesitate to contact me.

Kind regards,

Paul

Paul Butler
Director



www.pbplanning.co.uk

[REDACTED]
[REDACTED]
PO Box 827, York, YO31 6EE

City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

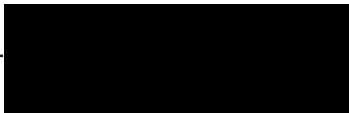
Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Paul
Last Name		Butler
Organisation (where relevant)	McCarthy & Stone	PB Planning Ltd
Representing (if applicable)		
Address – line 1		PO Box 827
Address – line 2		York
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		YO31 6EE
E-mail Address		
Telephone Number		

Representations must be received by Monday 22 July 2019, up until midnight.

Representations received after this time will not be considered duly made.

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B - Your Representation

(Please use a separate Part B form for each issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM3, PM4, PM5, PM22 and PM44

Document:

Proposed Modifications & Housing Needs Update

Page Number:

Various

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Please see enclosed representations

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared **Justified**

Effective **Consistent with national policy**

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

Please see enclosed representations

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

Please see enclosed representations

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please see enclosed representations. We need to be present to fully put forward our case for the retention of the site allocation (Ref. ST16 - Terry's Car Park) within the Local Plan.

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 2018 to inform the Local Plan process. We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't. City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

Signature

Date

22.07.19

Local Plan,
City of York Council,
West Offices,
Station Rise,
York,
YO1 6GA

22nd July 2019

Dear Sir or Madam,

CITY OF YORK LOCAL PLAN – TERRY’S CAR PARK – McCARTHY & STONE - SUPPORT FOR SITE REFERENCE ST16

We write on behalf of our client McCarthy & Stone to provide City of York Council (CYC) with our representations to CYC’s Proposed Modifications to the York Local Plan (June 2019).

McCarthy & Stone **support** CYC’s identification of the Terry’s Car Park site as a proposed housing allocation within the emerging City of York Local Plan. Whilst the site’s allocation is supported, we believe changes are required to the site specific policy criteria to reflect recent pre-application discussions between McCarthy & Stone and CYC. The changes we request will allow for the development of the site to maximise the delivery of much needed homes for older people in the City.

As CYC are aware, a pre-application enquiry for the development of the site was submitted in January 2019. The pre-application enquiry reference is 19/00012/PREAPP. The enquiry relates to the redevelopment of the site for 72 retirement living plus units of C2 use.

Whilst we will continue to work with CYC to seek to secure planning permission at the site as soon as possible, we consider it pertinent to continue our promotion of the site through the Local Plan process to ensure that sufficient evidence has been provided to demonstrate the deliverability of the development site and to ensure that the site specific policy requirements relate to our client’s development proposals for the site.

MEETING THE CITY OF YORK’S FUTURE HOUSING NEEDS

As stated above, it is our view that the site specific policy wording associated with the development of the site should be amended in order to maximise the delivery of much needed homes for older people in the City.

Whilst the Proposed Modifications do not propose to make changes to site specific policy wording associated with proposed housing allocations, CYC’s publication and use of the Housing Needs Update (HNU) in January 2019 does seek to make amendments to the Local Plan’s objectively assessed housing needs of the City.

Since the submission of the Local Plan to the Secretary of State, our client’s have secured an interest in the Terry’s Car Park site and thus have not until this time had an opportunity to provide representations in respect of the site specific policy for the proposed allocation.

Accordingly, as our client’s proposals will deliver a specific type of housing that correlates directly to the housing needs identified within the Local Plan’s housing needs evidence base, it is our view that the changes we request are of direct relevance to the Proposed Modifications to the Local Plan.

As the HNU doesn’t seek to update CYC’s evidence in respect of housing needs for older people, it therefore corroborates the evidence previously provided in the Strategic Housing Market Assessment (2016 and 2017).

The SHMA analysis identified that over the 2012-2033 period there is an identified need for 84 specialist units of accommodation for older people (generally considered to be sheltered or extra-care housing) per annum. In addition, the SHMA highlights a potential need for an additional 37 bedspaces per annum for older people (aged 75 and over) in the 2012- 2033 period for nursing and residential care homes.

The analysis therefore identifies a need for 1,764 specialist units for accommodation for older people and 777 bedspaces for older people in nursing and residential care homes in the period 2012 to 2033. There is an acute housing need for older people in the City which is required to be provided as soon as possible.

With regards to the delivery of specialist housing for older people, proposed Policy H9 of the Local Plan identifies that CYC will work to enable the delivery of specialist (supported) housing and registered care housing for vulnerable people, including for the ageing population, such as extra-care accommodation.

Our client's proposed development at Terry's Car Park will make an important contribution to meeting these identified housing needs. The proposals fully align with the housing needs evidence base which underpins the Local Plan and proposed Policy H9 of the Local Plan.

Through working constructively with CYC we believe that the Local Plan can seek to maximise the delivery of housing for older people from the site and as there are no issues of prematurity, it is our view that there is no reason why the site cannot be released for development immediately. These matters are discussed further below.

PRE-APPLICATION ENQUIRY – THE PROPOSED DEVELOPMENT OF THE SITE

A pre-application enquiry for the development of the site was submitted in January 2019. The pre-application enquiry reference is 19/00012/PREAPP. The enquiry relates to the redevelopment of the site for 72 retirement living plus units of C2 use.

Our client's proposed development seeks to deliver a Retirement Extra Care scheme in the region of 72 units under C2 "Residential Institutions" of the Use Class Order. The Retirement Living Plus accommodation falls within the C2 Use Class as these units will seek to provide accommodation for the frail elderly, typically over 80 years of age, with the aim of maintaining their independence via a wide range of communal facilities and care packages tailored to their individual needs.

The proposal involves the redevelopment of a previously developed site to provide much needed specialist accommodation for older people. The site was formerly a car park and as such falls within the definition of "previously developed land" as set out in the Framework. The site is located on the edge of the City, and therefore within a highly sustainable location.

A site's location plays an important role in the delivery of a Retirement Extra Care scheme. The location needs to be sustainable and accessible to a wide range of services and facilities via walking, cycling and public transport. Accordingly, the potential number of sites in the City which are currently available to our client is limited. Not only due to the special characteristics needed, but also due to competition from other uses such as student accommodation. The historic character of the City also limits the potential number of sites where a building of the size and scale needed to deliver the required number of units to create critical mass can be appropriately provided.

The Terry's Car Park sites meets each of the required locational criteria and the sensitive design being proposed will ensure that the historic character of the City is preserved. Accordingly, we respectfully request that the Council recognises the opportunity that the site's development can make towards meeting the well evidenced acute shortage of housing for older people in the City.

The proposed building is to be 4-5 storeys in height, that would sit in a high quality landscape setting that will provide recreation opportunities for its residents appropriate to their age. The scheme will

provide an element of parking for residents, visitors and staff. The scheme will also retain the northern section of the site for car parking associated with the adjacent office/commercial uses at the main Terrys' Factory site.

Impacts on the character and appearance of the area have been taken into account in the design of the proposed development. By virtue of existing extensive mature tree coverage in the immediate area of the site, and as the site sits at a lower ground level from Bishopthorpe Road, long range views of the proposed building from visually important areas will not be seen in long range vistas.

The siting of the proposed building has also been carefully chosen to allow for views through the site onto the Terry's Factory Site, to the Racecourse and from public vantage points located along the River Ouse.

Existing residential development adjacent to the site is 4-storeys in height and as the site has a lower ground level than Bishopthorpe Road, the potential to deliver a 5-storey building has been considered.

The pre-application discussions that have taken place with CYC have identified that the principle of development is considered acceptable. There are two areas of the scheme that McCarthy & Stone have been asked to consider. The first being the proposed design of the 5th storey to create a more lightweight design that provides a more open feel when looking onto the building, in order to aid potential long range views onto the site. The second is the provision of a Visual Impact Assessment to provide evidence that the proposed development will not have an adverse impact on long range views onto the site and to ensure the proposed building wont impede long range views onto other important vistas of the City. This work is currently in the process of being undertaken and will be submitted to CYC shortly.

Following the submission of the further evidence, our client will then seek to progress with pre-application discussions with CYC with the view of submitting a planning application before the end of the year.

Should the planning application be approved within the monitoring year 2020/2021 it is anticipated that the development of the site will be completed in the monitoring year 2022/2023. Resulting in the delivery of 72 much needed residential care units from the site in the first five years post adoption of the Local Plan. Given the well evidenced acute shortage of housing for older people in the City, we would expect CYC to wish to work proactively with our clients to ensure that the site can come forward for development in the manner proposed as quickly as possible.

SITE SPECIFIC POLICY REQUIREMENTS – POLICY SS14

As alluded to above, Policy SS14 of the submitted Local Plan provides site-specific criteria to guide the proposed development of the site. The criteria was identified before our client's secured an interest in the site and prior to the commencement of formal pre-application discussions.

Accordingly, our clients are seeking to amend the site-specific criteria to reflect the current development proposals and in doing so ensure that the policy allows for the delivery of much needed housing for older people to be maximised at the site.

The site specific policy wording and our client's requested amendments are set out in the table below:

TERRY'S CAR PARK – POLICY SS14 REQUIREMENTS	
Proposed Policy Criteria	McCarthy & Stone Response
Deliver development with high quality urban design, given the site's association with the wider Terry's factory site and the sites location as an entry point to the city, to contribute to the architectural merit of the city. This includes conserving and enhancing the special character	No change is requested to this element of the policy. The proposed development has been designed to respect the character of the area and to ensure that important long range vistas through the site are not impeded. Through working closely with CYC officers as part of the

<p>and/or appearance of the Tadcaster Road and The Racecourse and Terry's Factory Conservation Areas.</p>	<p>current pre-application process, the scale, form, siting, massing and appearance of the building will be designed to ensure that this criteria can be met.</p>
<p>Be of a low height and complement existing views to the factory building and clock tower from the Ings, Bishopthorpe Road and the Racecourse.</p>	<p>It is our view that this criteria should be removed or amended to solely read "<i>Complement existing views to the factory building and clock tower from the Ings, Bishopthorpe Road and the Racecourse</i>". We believe that the criteria isn't needed as its requirements are covered by the first criteria. Furthermore, the reference to "<i>Be of a low height</i>" does not take into consideration the careful design and siting of the current proposed development; the extensive mature tree coverage surrounding the site; and the lower height of the site in respect of Bishopthorpe Road. Finally, the reference to "<i>Be of a low height</i>" would have the impact of restricting the number of units that the site can deliver. Through the pre-application process, discussions will take place with CYC officers to ensure that the scale, form, massing, siting and appearance of the building will be designed to ensure that views onto surrounding vistas are not impacted. Importantly, the siting of the proposed building has also been carefully chosen to allow for views through the site onto the Terry's Factory Site, to the Racecourse and from public vantage points located along the River Ouse. The reference to "<i>Be of a low height</i>" should therefore be removed as it will unnecessarily restrict the delivery of much needed housing for older people at the site.</p>
<p>Constrain development to the boundary of the car park including any open space requirements.</p>	<p>The current development proposals are located purely within the boundary of the existing car park area, including open space requirements. The restriction provided by this criteria should be read against the point we make above in respect of not limiting any development of the site to being low in height. Otherwise the potential to maximise the development of a previously developed site for much needed homes for older people will be unnecessarily restricted.</p>
<p>Retain existing vegetation and provide additional appropriate treatment on the southern and eastern boundaries.</p>	<p>The development proposals will retain existing vegetation and provide additional appropriate treatments on the southern and eastern boundaries of the site where needed. This matter will be discussed with CYC officers as part of the ongoing pre-application discussions.</p>
<p>Delivery of Approximately 33 Dwellings</p>	<p>Whilst the identified capacity is only indicative at this point, as formal pre-application discussions with CYC have commenced, and have been largely positive so far, it is our view that the proposed capacity and use of the proposed scheme should be reflected in the site-specific policy within the Local Plan. This is to ensure that there is no ambiguity when our future planning</p>

	<p>application is in the process of being determined by CYC. Especially given the well-evidenced acute housing needs for older people that the development proposal seeks to deliver.</p>
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At the point of writing this letter, we expect that there could be the potential for a planning application to be approved at the site ahead of the Local Plan being adopted. Which would mean that the site-specific policy for the site would need to be amended to reflect any approved planning permission. However, should this not be the case, we would hope that CYC can agree to our proposed changes as early as possible through informing the Local Plan Inspector within any future Hearing Statements or further proposed modifications to the Local Plan.

Any future planning application will be supported by the full range of technical reports. Which our client are in the process of undertaking. The technical reports will confirm that the development proposals are situated in a suitable and highly sustainable location and there are no technical or environmental (built and natural) constraints that would preclude the development of the site. The site is available now as it is under the control of a McCarthy & Stone who are actively seeking to secure planning permission for the development of 72 residential care units at the site. The site can also be considered achievable as our clients can deliver new homes on the site within the next five years.

The site can deliver socio-economic benefits to the City, in respect of providing much needed new homes for older people within the early years of the Plan Period and new direct and indirect employment opportunities.

THE CASE FOR THE SUBMISSION & APPROVAL OF A PLANNING APPLICATION NOW

In light of the evidence provided within this letter and through the current pre-application enquiry process, we believe that there is a case for the submission and approval of a planning application at this site ahead of the adoption of the Local Plan. Subject to the detailed elements of the planning application being agreed with CYC of course.

A precedent for this approach was recently established by CYC in their recommendation for approval, and subsequent approval of the officer recommendation by CYC's planning committee, in relation to the Miller Homes application at the Former Civil Service Club and Agricultural Land to the North of Boroughbridge Road, York (Ref. 14/02979/FULM).

The conclusions identified in the application committee report were as follows: -

The officers report explains how the scheme, subject to conditions can be NPPF compliant, in particular with regards to the impacts on the highway network and promoting sustainable travel, residential amenity, biodiversity, flood risk and drainage, archaeology and there are mechanisms to provide adequate infrastructure needed to support the development.

The site is considered at this time to remain within the general extent of the Green Belt. However, it has been assessed as to not serve the purposes of the Green Belt (as defined in the NPPF) and it is considered that there are very special circumstances that would clearly outweigh any harm to the Green Belt. Further, there is no case for refusing the scheme on prematurity grounds.

On the basis of the merits of the case, it is considered that should a formal recommendation have been made to Planning Committee, it would have been one of approval subject to appropriate conditions and planning obligations incorporated within a section 106 agreement”.

With regards to demonstrating very special circumstances, the committee report identified that these were associated with unmet housing need that cannot be accommodated on deliverable sites on land that is outside of the general extent of the Green Belt. The site's location at the edge of the urban area

and on one of the main transport corridors into the City was also identified. Finally, the report stated that the *“Council cannot currently demonstrate an NPPF compliant 5 year housing supply on deliverable sites on land that is outside of the general extent of the Green Belt, i.e. the site allocations in the emerging Local Plan are required. This site is an allocated housing site in the emerging Local Plan”*.

Our client’s development proposals at the former Terry’s Car Park not only meets each of the same criteria identified above, but it improves on them by being an entirely previously developed site.

With specific regards to prematurity, the aforementioned committee report identified that that to grant permission would not undermine the plan-making process because the Council’s assessment of the Green Belt to inform the emerging plan concluded that the site does not perform Green Belt functions. Furthermore, given the size of the site (266 dwellings); that the site no longer performs any Green Belt function; and as the emerging Local Plan has been submitted for examination and promotes this as a housing site to be delivered within the short to medium term of the plan, there are not clear grounds (as required by the Framework) to refuse this particular application on the basis that it would prejudice the plan-making process.

The committee report does caveat this approach by identifying that the effect either individually or cumulatively of allowing other development in the general extent of the Green Belt (in advance of the emerging plan being adopted) which would be so significant, that to grant permission would undermine the plan-making process, would require consideration on a case by case basis in any other forthcoming schemes.

However, given our client’s site is located on previously developed land; can deliver a specialist housing need of which there is an acute shortage of in the City within the next five years; and would equate to 72 residential care units (27% of the Boroughbridge Road site), it is clear that the proposals would not cause prematurity issues in respect of undermining the plan-making process.

Whilst the Miller Homes scheme will ultimately be determined at appeal, the Council’s view of the proposals in respect of the case for very special circumstances and prematurity has been made clear. We would therefore urge CYC to accept the special opportunity provided by our client’s proposals without delay. The proposals can make an important contribution to delivering specialist housing needs within the next 2 years. The ability of the site to meet these needs will only be delayed if we are required to wait until the adoption of the Local Plan.

As identified above, the pre-application discussions with the Council have been positive and we are in the process of providing the further requested information to confirm officers support for the scheme.

Should CYC support our proposed approach to submit an early planning application, following the completion of the pre-application process we would then seek to submit a planning application before the end of the year. By this time the Inspector’s decision on the Miller Homes application will likely have been received and the initial stages of the Examination in Public of the Local Plan will have been completed. The likely result being that even more weight can be attached to the emerging Local Plan in the determination of any planning application at this site.

Given the lack of a demonstrable five year supply of housing in the City, the ability of the site to make an important contribution to meeting the City’s housing needs and the acute shortage of housing for older people should be given significant weight in the determination of any immediate planning application at this site.

The specialist housing needs that these proposals can meet need to be delivered now. Why wait a further year or two, when the planning mechanism to release the site to deliver these needs is available now.

CONCLUSIONS

On the basis of the information provided within this letter, and the submitted pre-application enquiry at the site, we wish to place on record our support for the proposed allocation of the Terry's Car Park site for residential development within the emerging City of York Local Plan.

The site represents a truly deliverable residential development site that can deliver a number of socio-economic benefits to the City. Including the delivery of much needed homes for older people within the first five years of the Local Plan.

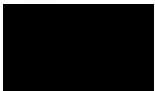
Whilst we will continue to work with CYC to seek to secure planning permission at the site as soon as possible, we consider it pertinent to continue our promotion of the site through the Local Plan process to ensure that sufficient evidence has been provided to demonstrate the deliverability of the development site and to ensure that the site specific policy requirements relate to our client's development proposals for the site.

The early release of the site ahead of the adoption of the Local Plan would not create any issues in respect of prematurity and given the lack of a demonstrable five year supply of housing in the City, the ability of the site to make an important contribution to meeting the City's housing needs and the acute shortage of housing for older people should be given significant weight in the determination of any immediate planning application at this site.

It is our view that the site-specific policy criteria associated with the development of the site need to be amended. Otherwise the potential to maximise the development of a previously developed site for much needed homes for older people will be unnecessarily restricted.

Should you require any further details or clarification on the content of this letter please do not hesitate to contact me.

Yours sincerely,

A solid black rectangular box redacting the signature of Paul Butler.

PAUL BUTLER

Director

A solid black rectangular box redacting the contact information of Paul Butler.

From: Nigel Thompson [REDACTED]
Sent: 19 July 2019 10:48
To: localplan@york.gov.uk
Subject: City of York Local Plan Proposed Modifications (June 2019) Consultation - Comment from Nigel Thompson

Follow Up Flag: Follow up
Flag Status: Completed

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

I wish to raise concerns regarding the draft local plan and in particular, **the failure to amend it by removing ST19 as part of the proposed modifications, Northminster Business Park**

I believe therefore that in this respect, this part of the plan fails on the following grounds:

1. Legal Compliance

To be legally compliant the plan has to be prepared in accordance with the Duty to Cooperate and legal and procedural requirements, including the 2011 Localism Act and Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

The Neighbourhood Plan for Poppleton

(https://www.york.gov.uk/downloads/file/14675/upper_and_nether_poppleton_neighbourhood_plan_adopted_version_october_2017) was very specific (8.2) that expansion of Northminster Business Park outside its 2017 boundary would NOT be supported. At the referendum, 91% of the population voted in favour of the Neighbourhood Plan. The City Planners have so far chosen to ignore the views of the local population by proposing expansion of the business park (site ST19, policy SS23) and *corresponding reduction in the size of the Green Belt*. This is blatantly ignoring local democracy. It also flies in the face of their response to the inspectors, as they have not demonstrated any special circumstances:

EX/CYC/7 - City of York letter of response to Inspectors 13 November 2018

"Once established, Green Belt boundaries should only be altered in exceptional circumstances (Paragraph 83 of NPPF). Although strictly speaking it is the general extent of York's Green Belt and not its boundaries that have been established, we take the view that it would be prudent to treat any incursions into the general extent of Green Belt as land removed from the Green Belt, whether to provide land for development or to 'inset' villages, reflecting the emerging spatial strategy. On this basis we accept that any such incursions should pass the "exceptional circumstances" test".

2. Soundness

Soundness is explained in the National Planning Policy Framework (NPPF). The Inspector conducting the Examination in Public has to be satisfied that the Local Plan is 'sound' –namely that it is:

- **Positively prepared** - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

- **Effective** - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework (NPPF).

Purely with regard to ST19, it is not justified to enlarge Northminster Business Park at the expense of the Green Belt when:

- a) The Business Park is not a special case, and therefore inconsistent with Green Belt policy as laid down in the NPPF;
- b) it puts at risk a larger section of Greenbelt between the A1237 and the edge of Acomb as this will become cut off from the countryside, as advised to the planning department on numerous occasions by the local residents;
- c) It is unjustified as there is plenty of brownfield land within York that should be developed first;
- d) It is unjustified and not positively prepared, as any expansion puts even more traffic down a country lane for which it was never designed, including a near constant stream of 44 ton juggernaut lorries. This leads to congestion, noise and pollution at peak times, and detracts from the residential amenity and quality of life of the residents of Northfield Lane.

For all the above reasons, unless ST19 is taken out of the Local Plan, the Local Plan should be **rejected**.

Yours sincerely
Nigel Thompson

From: localplan@york.gov.uk
Sent: 22 July 2019 18:02
To: localplan@york.gov.uk
Subject: FW: Response to CYC Local Plan Proposed Modifications Consultation OBO Private Landowners Sunderland and Wilson
Attachments: Sunderland Proposed Mods Response 220719.pdf; Sunderland Proposed Mods Response Form 220719.pdf
Follow Up Flag: Follow up
Flag Status: Completed

From: Kathryn Jukes [REDACTED]
Sent: 22 July 2019 14:11
To: localplan@york.gov.uk
Subject: Response to CYC Local Plan Proposed Modifications Consultation

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good afternoon

Please find attached our response to the current consultation on the City of York Local Plan Proposed Modifications.

We look forward to receiving confirmation of receipt in due course.

Kind regards
Kathryn

Kathryn Jukes BA (Hons) DipTP MRTPI
Director
Directions Planning Consultancy Ltd

[REDACTED]
[REDACTED]
[REDACTED]
Web: www.directionsplanning.co.uk



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City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make.

Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Ms
First Name		Kathryn
Last Name		Jukes
Organisation (where relevant)		Directions Planning Consultancy Ltd
Representing (if applicable)		Mr & Mrs Sunderland and Mr & Mrs Wilson
Address – line 1		██████████
Address – line 2		██████████
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		██████████
E-mail Address		████████████████████
Telephone Number		████████████████████

Representations must be received by Monday 22 July 2019, up until midnight.

Representations received after this time will not be considered duly made.

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

Please see attached letter

Document:

Please see attached letter

Page Number:

Please see attached letter

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Please see attached letter

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared **Justified**

Effective **Consistent with national policy**

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

Please see attached letter

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

Please see attached letter

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To take part in discussions in order to make clear our concerns.

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 2018 to inform the Local Plan process. We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't. City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

Signature



Date 21/07/19

**RESPONSE TO THE PROPOSED MODIFICATIONS
CONSULTATION**

CITY OF YORK LOCAL PLAN

**PREPARED ON BEHALF OF
MR & MRS SUNDERLAND AND MR & MRS WILSON**



Prepared By:
Kathryn Jukes BA (Hons) DipTP MRTPI
23 Victoria Avenue
Harrogate
HG1 5RD



22 July 2019

INTRODUCTION

Directions Planning Consultancy has been instructed in behalf of Mr and Mrs Sunderland and Mr and Mrs Wilson to review the Proposed Modifications and new evidence, and respond to the latest consultation on the draft City of York Local Plan.

COMMENTS ON THE PROPOSED MODIFICATIONS

Our comments relate to the Proposed Modifications Consultation document, and associated evidence base. Wherever possible, we have referred to the Proposed Modifications and the documents to which our comments relate.

PM3 Explanation of City of York Housing Needs

A number of the proposed modifications are intended to seek an amendment to the housing target, which will result in the annual target being reduced from 867 to 790 dwellings. Rather than repeat our comments under each reference number separately, we would kindly request that our concerns set out under PM3 are noted in respect of each of the following Proposed Modifications:

- PM4 Policy SS1: Delivering Sustainable Growth for York – Policy
- PM5 Policy SS1: Delivering Sustainable Growth for York – Explanation
- PM20a Policy H1: Housing Allocations
- PM21 Policy H1: Housing Allocations
- PM22 Policy H1: Housing Allocations Explanation
- PM44 Table 15.2: Delivery and Monitoring - Housing

We understand the Inspectors originally wrote to the Council in July 2018 to highlight a number of initial concerns in respect of the soundness of the Plan. One of the concerns raised related to how there was no explanation as to why the housing target quoted in the Local Plan was 10% less than the recommended figure in the Council's evidence, as set out in SHMA (2016) prepared by GL Hearn.

Since the Inspector's letter was published, instead of answering the question concerning the decision to ignore the recommendation in the 2016 SHMA, the Council has attempted to sidestep the matter by commissioning GL Hearn to prepare a Housing Needs Study (2019). As such, the original question posed by the Inspectors appears to remain unanswered, and instead, the Council is attempting to secure an amendment to the housing target based on the 2019 Update that is now the subject of this current consultation.

As far as we are aware, proposed modifications can only be recommended by the Inspectors (Planning and Compulsory Purchase Act 2004). To date, the Inspectors have not requested for the housing target to be revised nor for the housing need evidence be reviewed. Instead, the Inspectors have asked the Council to explain why their consultant's recommended housing target was ignored. An appropriate response has not been provided, and instead the matter has been sidestepped. As a result, it appears an attempt is being made to change the nature of discussions rather than deal with the situation head on.

We are unclear why the Council felt compelled to commission the 2019 Update, or submit new evidence to the Examination, especially at such a late stage in the process. We also do not

understand why the Inspector's original questions in relation to the objectively assessed need remain outstanding. We believe a straight response is still needed as the Inspectors are required to consider the Plan as submitted. The changes now proposed should not be considered as an alternative to the content of the submitted Plan or the evidence used to inform the drafting of the Plan. Instead, the proposed modifications should be considered alongside the submitted Plan.

It is always the case that circumstances can change between the submission of a Plan and receipt of an Inspector's report, which is why Examinations are intended to examine Plans as submitted. If the process required every policy change or statistic update to be taken into consideration then no Plan would ever be adopted. There is, therefore, no requirement for the Council to update the objective assessment of need. Especially as the evidence submitted alongside the Plan was not out of date. The SHMA was only published in 2016 and the Plan was then submitted in 2018. As such, it complied with the Procedure Guide for Local Plan Examinations (June 2019), which explains evidence should be no more than a couple of years old. In a letter to the Inspector's the Council attempts to justify why an Update has been commissioned, but we do not believe the case put forward is justified. Even if the Government has released a Standard Methodology, there is no requirement for the Plan to take account of it. Especially as the Standard Methodology forms part of the revised version to the NPPF (2019), but the Local Plan is to be considered in light of the 2012 version of the NPPF, which makes no reference to the Standard Methodology. It therefore appears the Council is attempting to introduce matters that are not relevant to the consideration of this Local Plan Examination, especially as the NPPF 2012 expects housing targets to be based on objectively assessed need.

The update appears to be based on using the 2016 based SNPP rather than the 2014 based SNPP. Not only is the base data on which the assessment has been made different, but the assumptions on how to interpret the data have also been updated. As such, attempting to compare the 2019 assessment with the 2017 assessment is like comparing apples with pears.

Furthermore, many of the Council's criticisms of the 2016 SHMA have not been addressed in the latest 2019 Update. For example, the Council raised concerns that the 2016 SHMA to be "...speculative and arbitrary, rely too heavily on recent short-term unrepresentative trends..." yet the latest 2019 Update makes clear how some of the 2016 based SNPP data on which the assessment has been based is derived from much shorter time periods than the previous 2014 based SNPP. This is evident under paragraph 2.20 where it is mentioned how the household formation rates that underpin the 2014 data go back to 1971, but the 2016 data only goes back to 2001. Consequently, the 2019 Update does nothing to address the shortcomings of the previous 2016 SHMA, and certainly does not provide a more reliable evidence base. Instead, it highlights how important it is to include margins and buffers within target figures in order to create an appropriate amount of flexibility. As such, the new evidence simply opens a whole new conversation about statistics that is not an appropriate discussion to be conducting at such a late stage in the process.

Clearly, the housing target set out in the submitted Plan is unsound, because it ignored the evidence, which included the reasons why a 10% buffer needed to be added. The Council has provided no explanation to date as to why they decided to ignore the advice of their consultants, and why it was appropriate to artificially reduce the housing target. As such, the submitted Plan is unsound, because the housing target was not based on the objectively assessed need identified within the evidence. In

addition, there has been no justification as to why the target in the Plan has not been based on the evidence. In turn, this means the Plan cannot be effective because it fails to identify an appropriate housing target, and the Plan is not consistent with national policy because it ignores guidance on how to prepare plans.

One aspect that appears to be missing from the latest consultation is an assessment of the impact of changing the housing target on neighbouring authorities. There appears to be no assessment of the impact in relation to the Duty to Cooperate. Reducing the housing target for York has to have an impact on neighbouring authorities and their ability to meet their own housing need, and also on their economies. For this reason, we do not believe the Plan is legally compliant.

Test of Soundness

In order to make the Plan sound, we believe the proposed modification to reduce the housing target from 867 to 790 dwellings per annum should be ignored. Instead, the original evidence within the SHMA 2016 should be relied upon given it is based on data that is established from trends taken from a longer period than found in the 2019 Update. The Council should then be asked to answer the original question in order to either justify the target of 867 or else accept the higher figure proposed by GL Hearn in the 2016 SHMA. In doing so, the legal issue with regards to the Duty to Cooperate should not arise.

From: jadu-www@rsvm121.servers.jadu.net on behalf of webadmin@york.gov.uk
Sent: 22 July 2019 16:11
To: localplan@york.gov.uk
Subject: A new Local Plan proposed modifications consultation response form has been submitted

Follow Up Flag: Follow up
Flag Status: Completed

A new Local Plan proposed modifications consultation response form has been submitted via the CYC website.

Please record this information in your system and take action as appropriate.

NOTE: This information is only retained within the CYC CMS for 3 months, for quality assurance purposes - it is then deleted and destroyed.

Submission details

- Web ref: 122949
- Date submitted: 22/07/2019
- Time submitted: 16:10:50

The following is a copy of the details included.

About your comments

Whose views on the proposed modifications to the Local Plan do your comments represent?

Own comments

About you (individual response)

Name: Mrs Louisa Stevens

Address: [REDACTED]

About the organisation, group or other individual you are representing

Name:

Name of your organisation (if applicable):

Name of the organisation, group or other individual you represent:

Contact address: , , , ,

Contact details (individual or group)

Email address: louisacstevens@gmail.com

Telephone number: 07841527085

What are your comments about

Which proposed modification or new evidence document are you commenting on?

Proposed modification reference (PM1 to PM46): PM40

Document: Topic Paper 1 Addendum - Annex 4 - Urban Areas within the General Extent

Page number: 17

Your comments - Legal compliance of the Local Plan

Based on the proposed modification or evidence document, do you consider the Local Plan is legally compliant?:

No, I do not consider the Local Plan to be legally compliant

Do you consider the Local Plan to comply with the Duty to Cooperate?:

No, does not comply with Duty to Cooperate

Please justify why you do/do not consider the Local Plan to be legally compliant or in compliance with the Duty to Cooperate:

I don't believe the Local Plan to be legally compliant or in compliance with the Duty to Cooperate. Our Elvington Parish Council have not been included sufficiently in the process, and their views not been considered when the recommendation in Topic Paper 1 Addendum - Annex 4 - Urban Areas within the General Extent 'not to keep this land permanently open but to inset it within the Green Belt' has been taken.

I believe this whole process to be one using tactics of confusion, preying on the residents inability to understand the information provided, which is deliberately vague, or difficult to parse. CYC have made the ability of local residents to make their views clear and have answers to their questions responded to, as difficult as possible during the entire consultation process. CYC deliberately make sourcing information difficult to find and place barriers upon responses such as imposing 10 minute time outs when inputting data, making reference documents difficult to locate, and being purposefully vague with the explanation of sites proposed for development. Constantly resubmitting the same sites to develop over and over, being rejected, and then trying to circumvent these decisions by asking to remove the land proposed for development from the Green Belt seems like a shady, if not illegal, tactic to me. I do not understand why these sites are continuously being proposed for development when the planning inspectors have given their decisions. Stop trying to push your own agenda through.

Your comments - whether the Local Plan is 'sound'

Based on the proposed modification or new evidence document indicated, do you consider the Local Plan to be 'sound'?:

No, I do not consider the Local Plan to be sound

Your comments - the Local Plan is 'sound' (if applicable)

Related to the proposed modification or evidence document indicated above, you consider the Local Plan to be 'sound' - which of the 4 'tests of soundness' are relevant to your opinion:

Please give reasons for your answer(s):

Your comments - the Local Plan is not 'sound' (if applicable)

Related to the proposed modification or evidence document indicated above, you do not consider the Local Plan to be 'sound' - which of the 4 'tests of soundness' are relevant to your opinion:

Not positively prepared, Not justified, Not effective, Not consistent with national policy

Please give reasons for your answer(s):

We've answered these questions over and over again, providing detailed responses to each and every one time and time again. We should not have to go through the exact same process again and again just to satisfy your illegal planning proposals, which have now ended up with you trying to have designated Green Belt areas removed from this designation so that you can develop what you want when you want. This whole process is a farce and needs to be legally investigated. We as residents shouldn't have to keep raising our concerns each and every time. The inspector's have deemed the proposals illegal and against national policy, and working around that is a breach.

There are many reasons as to why these sites shouldn't be developed. Infrastructure is one, road access and road congestion is another, utilities another, flooding (the Green Belt land is waterlogged for most of the winter and after particularly rainy periods, and as we live in England, it rains a lot). It's used by wildlife as a safe area to hunt and live. I could go on. Developing on these sites will be detrimental to the environment and the village as a whole.

Stop trying to propose the same sites over and over again in the hope that we'll become complacent. It's a shady tactic and an abhorrent practice. Also, trying to remove designated Green Belt sites from the Green Belt is unacceptable as a workaround to furthering your proposals. Stop this practice.

Your comments - necessary changes

I suggest the following change(s) to make the Local Plan legally compliant or 'sound':

You should consult with our Elvington Parish Council properly, and also involve our local Councillor, Cllr Vassie on these proposed changes. I'm sure they'd have much to say about your tactics.

If you are seeking a change to the Local Plan, do you want to participate at the hearing sessions of the Public Examination?

Yes, I wish to participate

If you wish to participate at the hearing sessions, please state why you consider this to be necessary:

I don't believe the concerns of myself or of other residents are being relayed to the planning inspector by the Council. We're having to cover the same issues time and time again and enough is enough.

From: jadu-www@rsvm120.servers.jadu.net on behalf of webadmin@york.gov.uk
Sent: 22 July 2019 16:48
To: localplan@york.gov.uk
Subject: A new Local Plan proposed modifications consultation response form has been submitted

Follow Up Flag: Follow up
Flag Status: Completed

A new Local Plan proposed modifications consultation response form has been submitted via the CYC website.

Please record this information in your system and take action as appropriate.

NOTE: This information is only retained within the CYC CMS for 3 months, for quality assurance purposes - it is then deleted and destroyed.

Submission details

- Web ref: 122963
- Date submitted: 22/07/2019
- Time submitted: 16:47:38

The following is a copy of the details included.

About your comments

Whose views on the proposed modifications to the Local Plan do your comments represent?

Own comments

About you (individual response)

Name: Mrs Louisa Stevens

Address: [REDACTED]

About the organisation, group or other individual you are representing

Name:

Name of your organisation (if applicable):

Name of the organisation, group or other individual you represent:

Contact address: , , , ,

Contact details (individual or group)

Email address: [REDACTED]

Telephone number: [REDACTED]

What are your comments about

Which proposed modification or new evidence document are you commenting on?

Proposed modification reference (PM1 to PM46): PM40

Document: Topic Paper 1 Addendum - Annex 4 - Urban Areas within the General Extent

Page number: 17

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No, I do not consider the Local Plan to be legally compliant

Do you consider the Local Plan to comply with the Duty to Cooperate?:

No, does not comply with Duty to Cooperate

Please justify why you do/do not consider the Local Plan to be legally compliant or in compliance with the Duty to Cooperate:

I don't believe the Local Plan to be legally compliant or in compliance with the Duty to Cooperate. Our Elvington Parish Council have not been included sufficiently in the process, and their views not been considered when the recommendation in Topic Paper 1 Addendum - Annex 4 - Urban Areas within the General Extent 'not to keep this land permanently open but to inset it within the Green Belt' has been taken.

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Your comments - whether the Local Plan is 'sound'

Based on the proposed modification or new evidence document indicated, do you consider the Local Plan to be 'sound'?:

No, I do not consider the Local Plan to be sound

Your comments - the Local Plan is 'sound' (if applicable)

Related to the proposed modification or evidence document indicated above, you consider the Local Plan to be 'sound' - which of the 4 'tests of soundness' are relevant to your opinion:

Please give reasons for your answer(s):

Your comments - the Local Plan is not 'sound' (if applicable)

Related to the proposed modification or evidence document indicated above, you do not consider the Local Plan to be 'sound' - which of the 4 'tests of soundness' are relevant to your opinion:

Not positively prepared,Not justified,Not effective,Not consistent with national policy

Please give reasons for your answer(s):

We've answered these questions over and over again, providing detailed responses to each and every one time and time again. We should not have to go through the exact same process again and again just to satisfy your illegal planning proposals, which have now ended up with you trying to have designated Green Belt areas removed from this designation so that you can develop what you want when you want. This whole process is a farce and needs to be legally investigated. We as residents shouldn't have to keep raising our concerns each and every time. The inspector's have deemed the proposals illegal and against national policy, and working around that is a breach.

There are many reasons as to why these sites shouldn't be developed. Infrastructure is one, road access and road congestion is another, utilities another, flooding (the Green Belt land is waterlogged for most of the winter and after particularly rainy periods, and as we live in England, it rains a lot). It's used by wildlife as a safe area to hunt and live. Bats, which are a protected species in the UK, used these areas to nest, and it's illegal to disturb these nests. I could go on. Developing on these sites will be detrimental to the environment and the village as a whole.

Stop trying to propose the same sites over and over again in the hope that we'll become complacent. It's a shady tactic and an abhorrent practice. Also, trying to remove designated Green Belt sites from the Green Belt is unacceptable as a workaround to furthering your proposals. Stop this practice.

Your comments - necessary changes

I suggest the following change(s) to make the Local Plan legally compliant or 'sound':

You should consult with our Elvington Parish Council properly, and also involve our local Councillor, Cllr Vassie on these proposed changes. I'm sure they'd have much to say about your tactics.

If you are seeking a change to the Local Plan, do you want to participate at the hearing sessions of the Public Examination?

Yes, I wish to participate

If you wish to participate at the hearing sessions, please state why you consider this to be necessary:

I don't believe the concerns of myself or of other residents are being relayed to the planning inspector by the Council. We're having to cover the same issues time and time again and enough is enough.

From: chris wedgwood [REDACTED]
Sent: 22 July 2019 23:48
To: localplan@york.gov.uk
Subject: Consultation Response
Attachments: LocalPlanResponse2.rtf; LocalPlanResponse1.rtf

Follow Up Flag: Follow up
Flag Status: Completed

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear CYC,

Please find attached responses to the Local Plan modification consultation.

Regards
C Wedgwood

OFFICE USE ONLY:

ID reference:

City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	
First Name	Chris	

Last Name	Wedgwood	
Organisation (where relevant)		
Representing (if applicable)		
Address – line 1	██████████	
Address – line 2		
Address – line 3		
Address – line 4		
Address – line 5	██████	
Postcode	██████	
E-mail Address	████████████████████	
Telephone Number		

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and

'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspectors to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)

3. To which Proposed Modification or new evidence document does your response relate?

The whole approach to the Green Belt in this document is perverse and not consistent with National Legislation.

The NPPF states that "The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open (paragraph 79)."

- There are five purposes that green belt serves (paragraph 80), to:
 - o Check the unrestricted sprawl of large built-up areas.
 - o Prevent neighbouring towns merging into one another.
 - o Assist in safeguarding the countryside from encroachment.
 - o Preserve the setting and special character of historic towns.
 - o assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The NPPF does not state that any of these purposes is more important than any other. The Planning Inspector has assessed called in planning applications on the basis that all 5 are equal.

There is no valid justification for the Council to treat any of these with more or less importance than the others.

The wording of the RSS may have put importance on preserving the historic character of the city, but this should not be taken to be at the expense of the other 4 purposes.

In any event the RSS is a pre-NPPF document. It is the purpose of the New local plan to replace the NPPF with an NPPF compliant Local Plan. It would not be NPPF compliant to treat the 5 purposes of Green Belt differently.

The suggestion that a lesser weight could be applied to some of these purposes is just wrong. The concept of weight can not be applied in this way.

If a site meets any of the 5 purposes of Green Belt then it is by definition Green Belt. Development which is inappropriate in the Green Belt is mandated by the NPPF to contribute Substantial harm.

The example in 4.6 of a wind turbine shows just how dangerous this approach is. The suggestion that the wind turbine would cause less harm dependant on the Green belt purpose of the land is just wrong. If the development is inappropriate in the Green Belt it must contribute substantial harm!

Proposed Modification Reference:

Section 4: York Local Plan Strategic Approach to the Green Belt

Document: TP1 Addendum

What does ‘legally compliant’ mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

What does ‘Sound’ mean?

Soundness may be considered in this context within its ordinary meaning of ‘fit for purpose’ and ‘showing good judgement’. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework’s four ‘tests of soundness’ listed below.

What makes a Local Plan “sound”?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent

with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1):

(tick all that apply)

Positively prepared NO

Justified NO

Effective NO

**Consistent with NO
national policy**

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

It is not evidence based and is not consistent with National Policy.

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

Start again!

(If you are suggesting that the plan is legally compliant or sound please write N/A)

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination,

please outline why you consider this to be necessary:

Complexity of the Issues.

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data

Protection Act 2018 to inform the Local Plan process. We only ask for what personal information

is necessary for the purposes set out in this privacy notice and we will protect it and make sure

nobody has access to it who shouldn't. City of York Council does not pass personal data to third

parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation

including your personal information must be made available for public inspection and published

on the Council's website; they cannot be treated as confidential or anonymous and will be

available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

Signature 

Date 22/07/2019

OFFICE USE ONLY:

ID reference:

City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination. Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	
First Name	Chris	

Last Name	Wedgwood	
Organisation (where relevant)		
Representing (if applicable)		
Address – line 1	██████████	
Address – line 2		
Address – line 3		
Address – line 4		
Address – line 5	██████	
Postcode	██████	
E-mail Address	████████████████████	
Telephone Number		

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and

'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspectors to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)

3. To which Proposed Modification or new evidence document does your response relate?

The methodology for defining the inner boundary to the Green Belt is fatally flawed. It approaches the issue as if there is not already a Green Belt but there is.

The definition of a Green Belt boundary will remove land from the Green Belt as determined by the RSS.

The land removed has not been subject to an exceptional circumstances test and has not been assessed against the 5 purposes of Green Belt in NPPF 80.

The council previously stated to the inspector that any land removed must pass an exceptional circumstances test.

In this case the council has made up an area for York's built up area. It has then said that it does not need to assess land in that area and just goes ahead and removes it.

This area is not evidenced and is incorrect. The urban area does not extend to the ring road the whole way around the city.

If you look at Heslington you can see that on the map it joins up with the built up area drawn, however Heslington is a village in the Green Belt. Why is it in the Green belt if it joins up to the York urban area. The answer is it doesn't.

There are fields and open spaces between these 2 settlements which are identified in the Heslington Village Design Statement as important to keep open to protect the rural character of the village. These are required to prevent coalescence. But the council ignores that evidence.

There is a petition of 1300 residents asking for this area to be considered as Local Green Space since the Council is not giving any regard to its Green Belt status. It was the decision of elected representatives that this should be considered by the Local Plan working Group, but despite this the officers submitted the Local plan without considering it.

There is no identified need to remove any land from the Green Belt in the first part of the exercise as all land required to fulfill expected demand is assessed separately in a different stage. This does not meet the requirement for exceptional circumstances.

The 2005 draft Local Plan is not a suitable starting point as it has already been found to not be evidence based. This document relies upon the 2003 Green Belt Appraisal which has been found by the inspector to not contain any evidence. It also removes land from the green belt without considering all 5 purposes of Green Belt.

Proposed Modification Reference:

Section 5: Methodology for Defining Green Belt Boundaries
and the rest of the document

Document: TP1 Addendum

Page Number: Pages 22 to 81

What does ‘legally compliant’ mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

What does ‘Sound’ mean?

Soundness may be considered in this context within its ordinary meaning of ‘fit for purpose’ and ‘showing good judgement’. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework’s four ‘tests of soundness’ listed below.

What makes a Local Plan “sound”?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against

the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1):

(tick all that apply)

Positively prepared NO

Justified NO

Effective NO

**Consistent with NO
national policy**

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

It is not evidence based and is not consistent with National Policy.

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

Start again!

(If you are suggesting that the plan is legally compliant or sound please write N/A)

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Complexity of the Issues.

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

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is necessary for the purposes set out in this privacy notice and we will protect it and make sure

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parties for marketing, sales or any other commercial purposes without your prior explicit consent.

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including your personal information must be made available for public inspection and published

on the Council's website; they cannot be treated as confidential or anonymous and will be

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Storing your information and contacting you in the future:

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Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹The Council must also notify those on the database at certain stages of plan preparation under the Regulations. ²Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

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Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

Signature 

Date 22/07/2019

From: jadu-www@rsvm120.servers.jadu.net on behalf of webadmin@york.gov.uk
Sent: 22 July 2019 22:16
To: localplan@york.gov.uk
Subject: A new Local Plan proposed modifications consultation response form has been submitted

Follow Up Flag: Follow up
Flag Status: Completed

A new Local Plan proposed modifications consultation response form has been submitted via the CYC website.

Please record this information in your system and take action as appropriate.

NOTE: This information is only retained within the CYC CMS for 3 months, for quality assurance purposes - it is then deleted and destroyed.

Submission details

- Web ref: 123001
- Date submitted: 22/07/2019
- Time submitted: 22:15:50

The following is a copy of the details included.

About your comments

Whose views on the proposed modifications to the Local Plan do your comments represent?

Own comments

About you (individual response)

Name: Mrs Jane Moorhouse

Address: [REDACTED]

About the organisation, group or other individual you are representing

Name:

Name of your organisation (if applicable):

Name of the organisation, group or other individual you represent:

Contact address: , , , ,

Contact details (individual or group)

Email address: [REDACTED]

Telephone number: [REDACTED]

What are your comments about

Which proposed modification or new evidence document are you commenting on?

Proposed modification reference (PM1 to PM46): PM40

Document: TP1: Approach to Defining York's Green Belt -Addendum

Page number: pg 81

Your comments - Legal compliance of the Local Plan

Based on the proposed modification or evidence document, do you consider the Local Plan is legally compliant?:

No, I do not consider the Local Plan to be legally compliant

Do you consider the Local Plan to comply with the Duty to Cooperate?:

No, does not comply with Duty to Cooperate

Please justify why you do/do not consider the Local Plan to be legally compliant or in compliance with the Duty to Cooperate:

I am totally unable to complete this form within your time limit! This is the third time I've tried to submit my comments - each time i've written my page & press next, I find that I've been timed out & all my comments are lost!! This is a totally unfair & unjust & Undemocratic process. No ordinary person has the time to be able to submit reasonable comprehensive comments. The whole Local Plan process has been devised to not allow residents have their say about their little rural villages on the outskirts of York being overdeveloped & sat upon by CYC with travellers sites/showpeople sites/ industry & extra housing that CYC dont wish to have in the City centre because they want York to have a perception of being open & rural!!

Your comments - whether the Local Plan is 'sound'

Based on the proposed modification or new evidence document indicated, do you consider the Local Plan to be 'sound'?:

No, I do not consider the Local Plan to be sound

Your comments - the Local Plan is 'sound' (if applicable)

Related to the proposed modification or evidence document indicated above, you consider the Local Plan to be 'sound' - which of the 4 'tests of soundness' are relevant to your opinion:

Please give reasons for your answer(s):

Your comments - the Local Plan is not 'sound' (if applicable)

Related to the proposed modification or evidence document indicated above, you do not consider the Local Plan to be 'sound' - which of the 4 'tests of soundness' are relevant to your opinion:

Not positively prepared, Not justified, Not effective, Not consistent with national policy

Please give reasons for your answer(s):

Elvington Parish Council & the majority of Elvington residents supported Site H26 (and did not support H39). H26 is a logical join of two residential parts of Elvington. Yet CYC insist that H26 would cause a significant change to the form of the Village. However now in Table 2 that describe site SP1 (a Travelling Showpeople 3 plot site) as a Village extension - why is H26 dismissed as being an illogical village extension. H26 is on the main road - H39 is up a currently quiet safe rural road which will totally spoil the characteristics of our rural child-friendly village estate of Beckside.

Your comments - necessary changes

I suggest the following change(s) to make the Local Plan legally compliant or 'sound':

I suggest H26 is re-instated and developed in preference to H39.

I also suggest that SP1 is deleted as per the original Planning Inspectorate report which stated the Travelling Showpeople site should only be for a temporary period whilst CYC found more suitable sites. SP1 is next door to 5 residential houses - 4 of which are part of the Georgian Brinkworth Estate. The Stables plot is adjacent to a beautiful historical tree-lined driveway leading up to three of these houses.

If the Stables site (SP1) is taken out of Greenbelt then this sets a precedent for its neighbouring field & the historical properties to be also taken out of Greenbelt (else discrimination exists between Showpeople & ordinary residents)

If you are seeking a change to the Local Plan, do you want to participate at the hearing sessions of the Public Examination?

No, I do not wish to participate

If you wish to participate at the hearing sessions, please state why you consider this to be necessary:



From: jadu-www@rsvm120.servers.jadu.net on behalf of webadmin@york.gov.uk
Sent: 22 July 2019 22:51
To: localplan@york.gov.uk
Subject: A new Local Plan proposed modifications consultation response form has been submitted

Follow Up Flag: Follow up
Flag Status: Completed

A new Local Plan proposed modifications consultation response form has been submitted via the CYC website.

Please record this information in your system and take action as appropriate.

NOTE: This information is only retained within the CYC CMS for 3 months, for quality assurance purposes - it is then deleted and destroyed.

Submission details

- Web ref: 123009
- Date submitted: 22/07/2019
- Time submitted: 22:51:19

The following is a copy of the details included.

About your comments

Whose views on the proposed modifications to the Local Plan do your comments represent?

Own comments

About you (individual response)

Name: Mrs Jane Moorhouse

Address: 

About the organisation, group or other individual you are representing

Name:

Name of your organisation (if applicable):

Name of the organisation, group or other individual you represent:

Contact address: , , , ,

Contact details (individual or group)

Email address: [REDACTED]

Telephone number: [REDACTED]

What are your comments about

Which proposed modification or new evidence document are you commenting on?

Proposed modification reference (PM1 to PM46): PM40

Document: TP1 Annex 5

Page number: pg, 14, 41, 45

Your comments - Legal compliance of the Local Plan

Based on the proposed modification or evidence document, do you consider the Local Plan is legally compliant?:

No, I do not consider the Local Plan to be legally compliant

Do you consider the Local Plan to comply with the Duty to Cooperate?:

No, does not comply with Duty to Cooperate

Please justify why you do/do not consider the Local Plan to be legally compliant or in compliance with the Duty to Cooperate:

Elvington residents comments have been totally ignored on each consultation. The new siting of ST15 away from the A64 & instead now across the Elvington Runway is ludicrous. It destroys much of the tourism that the runway attracts from the Yorkshire Air Museum, & its race days & speed records. The previous siting is far more logical despite CYC's insistence that it harms the perception of York being surrounded by a rural hinterland - what rural hinterland if you are going to destroy all the villages on the outskirts!

SP1 being taken out of Green Belt is totally discriminatory against the ordinary resident of Elvington. A travelling Showpeople Site of 3 plots up along a historic tree-lined driveway leading to the Georgian complex of 3 houses. plus the site SP1 has two further houses adjacent to it. It is not surrounded by industry - it is in a gorgeous peaceful wild animal habitat which is all Green Belt & the residents here have had to abide by all the rules.

Your comments - whether the Local Plan is 'sound'

Based on the proposed modification or new evidence document indicated, do you consider the Local Plan to be 'sound'?:

No, I do not consider the Local Plan to be sound

Your comments - the Local Plan is 'sound' (if applicable)

Related to the proposed modification or evidence document indicated above, you consider the Local Plan to be 'sound' - which of the 4 'tests of soundness' are relevant to your opinion:

Please give reasons for your answer(s):

Your comments - the Local Plan is not 'sound' (if applicable)

Related to the proposed modification or evidence document indicated above, you do not consider the Local Plan to be 'sound' - which of the 4 'tests of soundness' are relevant to your opinion:

Not positively prepared, Not justified, Not effective, Not consistent with national policy

Please give reasons for your answer(s):

The Plan is ignoring the Green Belt rules governing conservation areas, positioning of Travelling People sites, Wildlife Corridors, previous planning Inspector decisions regarding the Green Belt status of Elvington Village & The Stables, Elvington

Your comments - necessary changes

I suggest the following change(s) to make the Local Plan legally compliant or 'sound':

Re-siting of ST15 away from runway & closer to A 64;
Re-instating of H26 instead of H39;
Deletion of SP1 as a Travelling Showperons Site; A site should be found on Brownfield or a field that is not adjacent to 5 residential houses! The Showperons site is basically an Employment site with all its equipment and maintenance work that takes place! it is totally unjust to have such a site in its current position = as per the original Planning Inspectorate report at the Appeal hearing when it was first given temporary permission.

If you are seeking a change to the Local Plan, do you want to participate at the hearing sessions of the Public Examination?

No, I do not wish to participate

If you wish to participate at the hearing sessions, please state why you consider this to be necessary:



From: jadu-www@rsvm121.servers.jadu.net on behalf of webadmin@york.gov.uk
Sent: 22 July 2019 23:07
To: localplan@york.gov.uk
Subject: A new Local Plan proposed modifications consultation response form has been submitted

Follow Up Flag: Follow up
Flag Status: Completed

A new Local Plan proposed modifications consultation response form has been submitted via the CYC website.

Please record this information in your system and take action as appropriate.

NOTE: This information is only retained within the CYC CMS for 3 months, for quality assurance purposes - it is then deleted and destroyed.

Submission details

- Web ref: 123015
- Date submitted: 22/07/2019
- Time submitted: 23:07:18

The following is a copy of the details included.

About your comments

Whose views on the proposed modifications to the Local Plan do your comments represent?

Own comments

About you (individual response)

Name: Mrs Jane Moorhouse

Address:

About the organisation, group or other individual you are representing

Name:

Name of your organisation (if applicable):

Name of the organisation, group or other individual you represent:

Contact address: , , , ,

Contact details (individual or group)

Email address: [REDACTED]

Telephone number: [REDACTED]

What are your comments about

Which proposed modification or new evidence document are you commenting on?

Proposed modification reference (PM1 to PM46): PM40

Document: TP1 Annex 4

Page number: pg, 16, 18, 20

Your comments - Legal compliance of the Local Plan

Based on the proposed modification or evidence document, do you consider the Local Plan is legally compliant?:

No, I do not consider the Local Plan to be legally compliant

Do you consider the Local Plan to comply with the Duty to Cooperate?:

No, does not comply with Duty to Cooperate

Please justify why you do/do not consider the Local Plan to be legally compliant or in compliance with the Duty to Cooperate:

Elvington Village should not become an inset village. It has good open views to the surrounding Green belt. It is an historical village which York should be proud of & try to protect.
Elvington Industrial Estate: The map showing the portion that is being taken out of greenbelt also covers Elvington Park & the Conifers (which are residential areas bordering fields)! The Industrial area should be the only part that is treated as non-greenbelt.

Your comments - whether the Local Plan is 'sound'

Based on the proposed modification or new evidence document indicated, do you consider the Local Plan to be 'sound'?:

No, I do not consider the Local Plan to be sound

Your comments - the Local Plan is 'sound' (if applicable)

Related to the proposed modification or evidence document indicated above, you consider the Local Plan to be 'sound' - which of the 4 'tests of soundness' are relevant to your opinion:

Please give reasons for your answer(s):

Your comments - the Local Plan is not 'sound' (if applicable)

Related to the proposed modification or evidence document indicated above, you do not consider the Local Plan to be 'sound' - which of the 4 'tests of soundness' are relevant to your opinion:

Not positively prepared, Not justified, Not effective

Please give reasons for your answer(s):

Only the industrial & commercial areas should be treated as non-greenbelt. The Village is an historical rural village with farms & rural traditions. York should be proud of it's small villages & protect the history if it wishes to portray itself as a Rural City.

Your comments - necessary changes

I suggest the following change(s) to make the Local Plan legally compliant or 'sound':

Do not treat Elvington Village as an inset village;
Redefine the greenbelt boundary around Elvington Industrial Estate so that it does not include the residential housing estates of Elvington park, The Conifers & Jubilee Court;
Do not take The Stables, Elvington Lane, out of Greenbelt. A Travelling Showpersons site of three plots (with numerous equipment & maintenance work) is totally inappropriately placed in this position next to 5 residential houses (Oak Trees, Brinkworth Lodge, Brinkworth Park House, Brinkworth Hall, The Old Coach House)

If you are seeking a change to the Local Plan, do you want to participate at the hearing sessions of the Public Examination?

No, I do not wish to participate

If you wish to participate at the hearing sessions, please state why you consider this to be necessary:

From: May, Rachel (Avison Young - UK) [Rachel.May@avisonyoung.com]
Sent: 19 July 2019 11:26
To: localplan@york.gov.uk
Cc: Halman, Gary (Avison Young - UK); Rebecca Mitchell
Subject: City of York Local Plan Proposed Modifications Consultation
Attachments: City of York Local Plan Proposed Modifications_Topic Paper TP1 - Approach to Defining Yorks Green Belt Representation.pdf; City of York Local Plan Proposed Modifications_Consultation Response Form.pdf; City of York Local Plan Proposed Modifications_Housing Needs Assessment Representation.pdf

Follow Up Flag: Follow up
Flag Status: Completed

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good morning,

Please find attached representations to the City of York Local Plan Proposed Modifications Consultation which have been submitted on behalf of Barwood Strategic Land II LLP.

I would be grateful if you could confirm safe receipt of these representations.

Kind regards,

Rachel

Rachel May

Planner

rachel.may@avisonyoung.com

Avison Young
Planning, Development and Regeneration
Norfolk House, 7 Norfolk Street
Manchester, M2 1DW
United Kingdom

D +44 (0)161 956 4080

M +44 (0)787 359 1256

avisonyoung.co.uk



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[Legal Disclaimer](#)

City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title	Ms.	Mr.
First Name	Rebecca	Gary
Last Name	Mitchell	Halman
Organisation (where relevant)	Barwood Strategic Land II LLP	Avison Young
Representing (if applicable)		Barwood Strategic Land II LLP
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Address – line 2		7 Norfolk Street
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Address – line 4		Manchester
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E-mail Address		Gary.halman@avisonyoung.com
Telephone Number		0161 956 4056

Representations must be received by Monday 22 July 2019, up until midnight.

Representations received after this time will not be considered duly made.

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM4, PM5, PM20a to PM20d, PM21a to PM20d, PM22 and PM44

Document:

Housing Needs Assessment

Page Number:

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Please refer to enclosed Representations. It should be noted that comments in relation to the above refereces relates to the housing number and therefore only one form has been completed.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

Please refer to attached representations which clearly demonstrate that the Plan is not sound.

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

Please refer to enclosed Representations.

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Barwood Strategic Land II LLP respectfully request that the representations enclosed are taken into consideration and that our client are kept up to date with the Examination in Public timetable. Avison Young confirm, on behalf of Barwood Strategic Land II LLP, that it would seek to participate in the Local Plan Examination.

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM29

Document:

Addendum to Topic Paper 1: The Approach to Defining York's Green Belt

Page Number:

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Yes

No

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alternatives, based on proportionate evidence.

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Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

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Yes

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared

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Effective

Consistent with national policy

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Part B -Your Representation

(Please use a separate Part B form for each issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

Document:

Strategic Housing Land Availability Assessment
(SHLAA) Figure 6

Page Number:

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4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Please refer to Question 5 answer.

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5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

The detailed housing trajectory currently out for consultation has been amended to reflect the new OAN figure of 790 dpa.

Notwithstanding this, there have been no other changes, for example to the assumed delivery rates or lead in times for strategic sites, save for the deletion of strategic sites H59 and ST35.

This response form should be read in conjunction with our previous representations which addressed these matters comprehensively.

In addition, figure 6 states that a total of 590 net housing completions took place during the 2018/19 monitoring year, whereas the recently published Full Year Housing Monitoring Update gives this figure at 449. The trajectory is therefore inconsistent with other Council published data.

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

Please refer to Question 5 answer.

7. If your representation is seeking a change at question 6.(1);

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Yes, I wish to appear at the examination

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Barwood Strategic Land II LLP respectfully request that the representations enclosed are taken into consideration and that our client are kept up to date with the Examination in Public timetable. Avison Young confirm, on behalf of Barwood Strategic Land II LLP, that it would seek to participate in the Local Plan Examination.

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 2018 to inform the Local Plan process. We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't. City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

Signature

Date

19/07/2019

City of York Local Plan Proposed Modifications
Consultation

Response on Behalf of Barwood Strategic Land II LLP

Topic Paper TP1: Approach to Defining Yorks Green Belt

July 2019

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Appendices

Appendix I	Plan showing Inner Boundary of Green Belt (extract from Topic Paper TP1 (March 2019) Annex 3
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Prepared By: Gary Halman
Status: Final Revision 1
Draft Date: July 2019

For and on behalf of GVA Grimley Limited t/a Avison Young

1. Introduction

- 1.1 These representations are submitted on behalf of Barwood Strategic Land II LLP to the Green Belt Topic Paper TP1 Addendum. Barwood has made extensive representations to the local plan throughout all key stages. These latest representations should be read in conjunction with those submitted to the Council in April 2018¹. Section 3 of those representations comprised a detailed critique of the Council's then Green Belt evidence base and reached the overall conclusion that the Council's approach was deeply flawed and the Plan was based upon an outdated appraisal of the York Green Belt, work essentially carried out prior to 2003.
- 1.2 The latest Green Belt Addendum Paper, prepared in response to requests by the Inspectors seeks to provide further justification and explanation of the Council's approach, firstly to define a long-term Green Belt boundary around the city and secondly to cast some light on how it has assessed and chosen proposed housing and employment sites when making allocations on land currently within the general extent of the Green Belt.
- 1.3 We set out at the outset that we do not believe the Topic Paper Addendum provides a sound and properly justified approach, not least because it still relies fundamentally upon the work underpinning the 2003 Green Belt Appraisal. Whilst there have been some partial updates subsequent to the 2003 work, this focuses upon heritage and relate to specific areas and sites; none of the post 2003 updates (in the form only of heritage topic papers) comprise a comprehensive review, nor do they re-evaluate fully the historic character and setting areas originally identified from limited fieldwork in 2003.
- 1.4 In summary Barwood maintains its objection that the Plan relies upon an out of date evidence base in this regard, contrary to Planning Policy Guidance. The Green Belt Addendum does nothing to reassure or offer any confidence that this matter has been addressed. In fact, as the following sections demonstrate, quite the reverse.

¹ Representations on behalf of Barwood Land Strategic II LLP: Land at Moor Lane, Winthorpe, York April 2018, HOW Planning LLP

2. York Local Plan Strategic Approach to the Green Belt

- 2.1 Section 4 of the Addendum describes the Council's strategic approach to Green Belt definition. It confirms (4.14) that the approach to the Green Belt Appraisal (2003) and its subsequent historic and setting updates (2011 and 2013) identify and summarise key components which are important to York's setting and special character, and these underpin the approach of the City of York Local Plan. Collectively this is termed the "Green Belt Appraisal" work.
- 2.2 This confirms that the Council still relies upon essentially the 2003 work as the evidence base underpinning its Green Belt approach. The remainder of this section of the Addendum then identifies, by reference to the historic Green Belt Appraisal work, various areas around the City and their relationship to Green Belt purposes. This focuses upon consideration of which areas it is necessary to keep permanently open to preserve the setting and special character of historic towns (purpose 4). This is regarded as the primary purpose of York's Green Belt.
- 2.3 Land which is regarded as fulfilling a role in relation to each Green Belt purpose is identified and considered in the remainder of this Chapter, culminating in an overall Plan (figure 7) which, through a combination of the previous drawings shows land which has been identified as "strategically important to keep permanently open" (paragraph 4.42).
- 2.4 We make two points in response to this section of the Addendum. First, this Chapter confirms that there has been no new field work or assessment to consider whether land originally identified in 2003 as fulfilling one or more Green Belt purposes still does so today. We believe that there have been changes in policy and best practice approach, as well as physical circumstances on the ground, which should have caused the authority to carry out a proper, comprehensive reappraisal of the open land around York and the extent to which it still fulfils Green Belt purposes.
- 2.5 Second, that virtually all the Council's strategic site allocations lie within areas of land identified in Figure 7 as strategic areas to keep permanently open. Thus identification of land fulfilling Green Belt purposes is not a bar to its consideration and identification as a sustainable development site.

3. Methodology for Defining Green Belt Boundaries

- 3.1 This section of the Addendum considers, inter alia, the definition of the inner Green Belt boundary. It says that the key role of the inner Green Belt boundary is “to establish long-term development limits to the built up area, and distinguished land that needs to be kept permanently open to meet the purposes of Green Belt including safeguarding the special character and setting of the historic City” (5.16). It goes on to subdivide land surrounding the urban area into seven subsections which are then further subdivided into smaller parcels, described in Annex 3 to the Addendum. Paragraph 5.9 of the Addendum reflects national policy and confirms that, in setting detailed boundaries of the Green Belt Authorities must not include land which it is unnecessary to keep permanently open².
- 3.2 Paragraph 5.42 of the Addendum highlights that the Councils approach to site selection uses “spatial shapers” to establish the best sites for development “by avoiding areas which it is necessary to keep permanently open”. Annex 3, referred to earlier, considers in detail the definition of inner Green Belt boundaries within the seven sub-areas. Land in which Barwood has a controlling interest falls within section 1 and specifically boundary 2 (page ref: A3: 9). The associated plan shows the inner boundary proposed by the Council notated as “Section 1”. A significant portion of Barwood’s site lies outside any of the areas identified as fulfilling Green Belt purposes, and crucially outside the area identified as protecting special character and setting (including coalescence). This is land which is regarded as important to keep permanently open in order to protect York’s special historic character.
- 3.3 The tabulated/pro forma assessment of the inner boundary (section 1, boundary 2 at page A3:9) fails to distinguish between this part of the land, which lies outside any of the areas identified as fulfilling Green Belt purposes, and other land which it considers does meet one or more purposes. In relation to both the approach to Strategic Openness and Local Openness discussed in the Addendum, the Council’s approach to defining the inner boundary at this point simply fails to reflect its own evidence base and fails to justify why it might be appropriate to depart from it.
- 3.4 Whilst the overall conclusion in this Appendix (page A3:11) is that “evidence shows that land to the south of the proposed boundary should be kept open in order to assist in safeguarding the countryside from encroachment and to preserve the historic character and setting of the City” we would respectfully point out that the evidence does nothing of the sort.
- 3.5 Furthermore, even in relation to the wider area of land south of Moor Lane which is shown as contributing to protecting special character and setting, the Council’s analysis is flawed and perpetuates previous assertions that views across this land to York Minster justify retaining all the land south of Moor Lane as permanently open. Our representations in April 2018, which are based on detailed fieldwork, demonstrate this to be an inaccurate characterisation of the true picture.

² NPPF (2012) para 85, Second bullet. Note that the Topic Paper Addendum misquotes this; there is a drafting error and “necessary” should read “unnecessary”.

4. Permanence and Safeguarded Land

- 4.1 Representations submitted on behalf of Barwood in April 2018 addressed the issue of permanence and objected to the omission of a safeguarded land policy in the Plan. Those representations argued for a Green Belt capable of enduring until at least 2043; the Addendum adopts the position that the Green Belt will endure for a minimum 20 years ie to 2037/38. Safeguarded land as a policy tool is well established and understood. Its advantages, in supporting a long-term permanent Green Belt boundary are clear.
- 4.2 By having a pool of safeguarded land, a Local Planning Authority has a reserve area of land resource in sustainable locations which it can look to (by means of a partial review of the Plan) should circumstances require it. Such circumstances could include higher levels of growth being achieved than the Plan anticipated or that allocated housing/employment sites and other sources of land supply (for example urban capacity/windfall) have not delivered at the rates or times assumed in the Plans trajectory. Either of these situations or a combination could plausibly give rise to a need for further land release during the plan period or soon afterwards in order to maintain continuity of supply to meet local needs. We do not regard the "oversupply" identified at para 7.103 of the Addendum to be an oversupply in reality for a number of reasons, including because of the Plan's underestimate of housing need and the difficulties of delivering a number of the proposed allocation sites, certainly within the timescales identified in the trajectory. The Councils position on post-Plan provision is therefore not sufficient to obviate the need for a safeguarded land policy, which covers more than purely future housing needs in any event.
- 4.3 Such further sites would almost inevitably need to come from the Green Belt necessitating a further and premature review, contrary to policy. Where a detailed Green Belt boundary is being defined, as here, for the first time, a cautious approach should be taken to ensure the Plan is sufficiently flexible to respond to such eventualities and a safeguarded land policy is a recognised, established and entirely appropriate means by which to provide this "safety valve" whilst still retaining confidence in a long term, durable Green Belt boundary.

5. Exceptional Circumstances

- 5.1 It is clear that, even on the basis of the Council's approach to OAN (which we consider to be deeply flawed, and a significant underestimate – see separate representations to the housing policy modifications) that insufficient land is currently available to meet Plan requirements. Even after taking into account other sources of supply, including urban capacity it is clear that York's future housing, employment and other development needs over an extended period of time can only be achieved through release of land from the general extent of the Green Belt established in RSS. We are quite clear and agree with the Council that exceptional circumstances exist which necessitate Green Belt release.
- 5.2 The extent of release needed depends partly on the level of need which the Plan requires to be met (which we consider to be an underestimate currently) and the robustness of its assumptions around windfall sites and urban capacity generally. We have previously made representations (see April 2018 submission) highlighting reasons why the windfall allowance is considered to be an overestimate, a matter which we anticipate will be explored in more detail in the Examination process, as will the urban capacity and true deliverability of the Council's identified sites which it claims total 6,502 dwellings (7.72).

6. Development Sites in the Green Belt

- 6.1 Paragraph 8.3 of the Addendum outlines that the Council has undertaken a site selection process to identify potentially suitable sites and reviewed them against Green Belt purposes. It has sought, it claims, to identify sites to come forward for housing, employment and other uses which are all in sustainable locations "offering least harm to the Green Belt when considered against the purposes set out in paragraph 80 of the NPPF".
- 6.2 The section goes on to set out a three stage process of Site Appraisal (para 8.4) culminating in (para 8.6) Table 2 which presents 21 sites in the Local Plan, considered by York to be the most suitable and sustainable and causing the least harm to the Green Belt. Although a key purpose of this document is to illuminate and detail the means by which site allocations in the Green Belt were chosen in our view the Addendum fails to do so. The process of site selection, from a Green Belt perspective, remains obscure and not justified, and this is a significant failing of the Plan. By way of example, as noted earlier, Annex 3 identifies a significant portion of the Barwood objection site at Moor Lane as lying outside any area identified in the Council's evidence base as being important to keep permanently open.
- 6.3 The Council's preferred site allocations are detailed in Annex 5 to the Addendum. Many of these lie within areas identified in the evidence base as fulfilling one or more Green Belt purposes and which should be kept permanently open. By way of example, Site ST31 (land at Tadcaster Road, Copmanthorpe) (7.5 ha, 158 dwellings) lies partly within an area identified as important to prevent sprawl, and partly within an area protecting special character and setting (including coalescence). The latter is regarded as crucial to the preservation of the setting and special character of York; the proforma accompanying this site confirms that this notation derives from the 2003 Green Belt evidence base. It goes on to note that "development would have a detrimental impact on the separation between Copmanthorpe and the urban fringe while reducing the gap between the village and the main urban area of York". In relation to purpose 4 (preserving the setting and special character of historic towns) similar text is included, with the importance of its separating role highlighted, "in order to retain the separation of settlements with a separate identity and physical character and retain the pattern of York's villages within a rural setting".
- 6.4 Notwithstanding the fact that this strategic allocation apparently contradicts the approach to site selection identified in the Topic Paper Addendum, the allocation is carried forward into the Submission Plan.
- 6.5 This highlights the lack of transparency and consistency, from a Green Belt perspective, of the Council's approach to selecting strategic sites.

7. Summary

- 7.1 These representations address the Addendum to Topic Paper 1 (Approach to defining York's Green Belt). They should be read alongside Barwood's representations to the submission Plan in April 2018.
- 7.2 Barwood maintains its objections to the Council's approach to defining a long term, durable Green Belt boundary. Although the Addendum contains more information than was set out in the original very brief Topic Paper 1 (May 2018) it fails to address the key point, namely that the baseline work which the Council relies upon dates from 2003. No comprehensive reassessment of the open land around York and the extent to which it should remain permanently open in order to meet Green Belt purposes has been carried out. This represents a serious and fundamental flaw in the Council's evidence base.
- 7.3 The way in which judgements were made as to which sites should be released from the Green Belt to meet development needs is still obscure and not properly justified. Sites such as Barwood's south of Moor Lane are excluded in the Green Belt Appraisal from the area considered to fulfil Green Belt purposes whereas other areas close by (see site ST31) which are said to fulfil important Green Belt purposes have been allocated for housing. The rationale and logic for this approach is unclear.
- 7.4 The Council has published an updated assessment of OAN. Separate representations address this and demonstrate the flaws in this work and that the report's conclusion, which is to reduce the level of housing need, is not justified or evidence based. As a result further sites which must come from areas of Green Belt will need to be found if the city is to meet its full level of need.

Appendix I

Extract showing Inner Boundary
Section 1 at Moor Lane (extract from
Addendum Annex 3 March 2019)



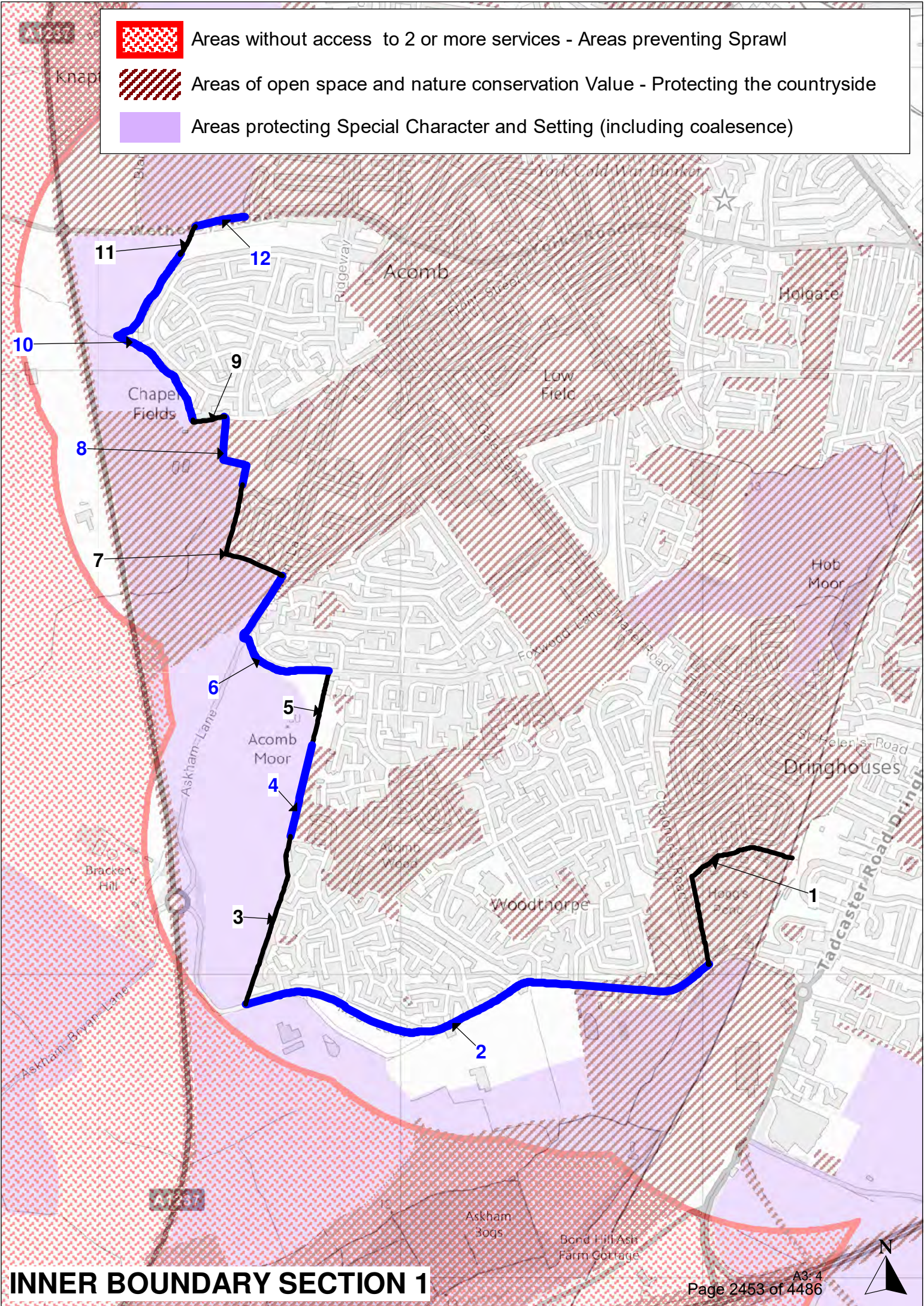
Areas without access to 2 or more services - Areas preventing Sprawl



Areas of open space and nature conservation Value - Protecting the countryside



Areas protecting Special Character and Setting (including coalescence)



INNER BOUNDARY SECTION 1



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City of York Local Plan Proposed Modifications
Consultation

Response on Behalf of Barwood Strategic Land II LLP

Representations in Respect of the City of York Housing
Needs Update January 2019

July 2019

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Appendices

Appendix I	Hatch Regeneris Review of York Housing Need June 2019
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Prepared By: Gary Halman

Status: Final Revision 1

Draft Date: July 2019

For and on behalf of GVA Grimley Limited t/as Avison Young

1. Introduction

- 1.1 These representations comment upon the Housing Needs Update January 2019 which is relied upon by the Council as justifying a number of proposed modifications to the Plan, most particularly those which seek to give effect to the reduced level of housing need which the Council considers this report justifies.
- 1.2 As well as containing our comments on the Housing Needs Update Report, this representation should therefore be taken as objecting to relevant policy and textural changes in the Plan including the following modifications: PM4; PM5; PM20A-20D; PM21A-21D; PM22; PM44.

2. Representations

- 2.1 Attached at Appendix 1 is a report by Hatch Regeneris comprising a review of York's Housing Need. This document comprises a critical review of the new housing need evidence published by the Council following work by GL Hearn.
- 2.2 For the reasons set out in Hatch Regeneris' report, their conclusion is that the Council's new evidence lacks the transparency necessary to fully test it, makes flawed judgments about the appropriate projections for York and contains assumptions which are not backed by evidence. The overall conclusion is that the study significantly understates York's full OAN.
- 2.3 The Hatch Regeneris work concludes that the minimum OAN for York should be 1,026 dpa, a level of housing growth that would support future employment growth and has the potential to deliver significantly higher levels of affordable housing.
- 2.4 In addition to a detailed critique of the OAN methodology and key inputs, Hatch Regeneris also raise an important point about the relationship between the Council's revised OAN figure and the Duty to Co-operate (see paras 2.8-2.13).
- 2.5 Hatch Regeneris highlight (2.12) that there appears to be no further update on the Duty to Co-operate process and what neighbouring Authorities consider to be any issues arising out of the 9% reduction in York's housing need to 790 dpa. Given the relationship between planned housing and jobs growth and in light of the fact that York is a net importer of journeys to work, the Council should demonstrate at the Examination that its Duty to Co-operate partners are satisfied that the revised lower figure has no adverse implications for them and the range across boundary issues identified through the process to date.
- 2.6 Please refer to the attached Hatch Regeneris report for our client's detailed representations and fundamental objections to the Council's approach to assessing and meeting housing need during the Plan period.

Appendix I
Review of York Housing Need
Hatch Regeneris report June 2019



HATCH
REGENERIS

Review of York Housing Need

A Final Report by Hatch Regeneris
18 July 2019

Barwood Strategic Land II LLP

Review of York Housing Need

This report contains the expression of the professional opinion of Hatch Regeneris (the trading name of Hatch Associates UK). It is based upon information available at the time of its preparation. The quality of the information, conclusions and estimates contained in the report is consistent with the intended level of accuracy as set out in this report, as well as the circumstances and constraints under which this report was prepared.

The report was prepared for the sole and exclusive use of Barwood Strategic Land II LLP. Hatch Associates Limited shall only be liable to Barwood Strategic Land II LLP and is not liable to any third party who intends to rely on or has relied or is currently relying upon this report (in whole or part).

18 July 2019

www.hatchregeneris.com

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3.	City of York Council's OAN Evidence	6
4.	Conclusions: York's OAN	30

1. Introduction

- 1.1 Hatch Regeneris was commissioned by Barwood Strategic Land to provide a critical review of the City of York's recently published new housing need evidence January 2019. This has been submitted to the Examination in Public of the City of York Local Plan, and provides an updated objectively assessed housing need (OAN) figure of 790 dwellings per annum (dpa). The Council is now relying on this new evidence and the OAN figure in the publication version of the Local Plan.
- 1.2 At the request of the Inspectors, the Council is currently carrying out a consultation on the new evidence which closes on 22nd July, which will inform the EIP. The report for Barwood Strategic Land is intended to provide part its response to the consultation.
- 1.3 The report assesses each aspect of EX/CYC/9's treatment of the OAN evidence and its soundness as the basis for the figure proposed in the Local Plan. This includes:
 - The housing market area and evidence relating to it.
 - The study's conclusions on the appropriate population and household projections for York.
 - How future jobs and housing are aligned in the OAN, and what this implies for the Local Plan.
 - How the OAN evidence addresses market signals indicators and the adjustments it makes for this.
 - Briefly, the study's treatment of affordable housing need.
- 1.4 The conclusion of the review is that the Council's new evidence lacks the transparency necessary to fully test it, makes flawed judgements about the appropriate projections for York and contains assumptions which are not backed by evidence. The outcome is that the study significantly understates York's full OAN.

2. Essential Context

Publication Local Plan

- 2.1 The publication draft City of York Local Plan was submitted for examination in May 2018. Policies SS1 and H1 identify an OAN of a minimum of 867 dwellings per annum. This is treated as the basis of York's housing requirement for a plan period to 2033, extended to 2037/8 to take account of the greenbelt period. A 20% buffer reflecting past persistent under-delivery of housing is included and built into the planned supply in the early years of the Plan.
- 2.2 Since its publication, the Council has proposed to the Inspectors what it described as minor modifications to the Local Plan that reflected a reduction in its preferred OAN figure from 867 dpa to 790 dpa for the Local Plan period 2013-33 (EX/CYC/13).
- 2.3 This change is based on new OAN evidence prepared by GL Hearn for the Council (EX CYC 9) and published in January 2019. The Housing Needs Update report takes account of new population, household, jobs, labour force and affordability data.
- 2.4 We agree with the Inspectors' response to the Council, which is that the change to the proposed OAN figure is fundamental to the soundness of the Local Plan, and that the proposed modifications to site allocations and green belt boundaries cannot be considered minor modifications (EX INS 6). The revised OAN of 790 dpa is substantially lower (9%) than the 867 dpa figure in the publication draft Plan.
- 2.5 This has led to a further public consultation on the Local Plan which is the focus of this report and our client's representations.
- 2.6 The Plan (Policy SS1) is clear about the annual number of jobs (650) for which it is providing employment land. The explanatory text indicates this is for the period 2017-38 (ie 21 years). Elsewhere (Policy EC1 Employment Land), the Plan suggests that the figure of 650 per annum was drawn from 2015 Oxford Economic projections (para. 4.2). The Plan suggests that these were 'sensitivity tested' (para. 4.2) against alternative Experian forecasts, but that the two were consistent. The robustness of this conclusion is an issue we consider in this report, since the study has chosen not to test a higher alternative employment growth figure that the Council itself accepts is reasonable.
- 2.7 The Plan does not expressly explain that planned housing and jobs growth are aligned. However, this alignment is one of the key tests of a Local Plan's soundness, and essentially rests on whether the population growth (allowing for in and out-commuting) that the Plan is providing for in its housing requirement is consistent with the growth in the labour supply necessary to support planned employment growth. In short, the issue is whether planned housing supports planned economic growth.
- 2.8 On the related issue of commuting, the Plan recognises that York is a 'net importer (para. 1.62) of journeys to work, but that there is also a significant out-commute to Leeds. It recognises that transport infrastructure improvements (para. 14.38) will be needed to respond to York's future growth and that of East Riding.
- 2.9 There are few references in the Plan to the Housing Market Area of which York is part (para. 5.16) and no specific reference to the HMA comprising the City of York and Selby. There is a brief summary of how the Council has worked with neighbouring authorities to determine whether any additional land should be made available to address a shortfall of housing in the York HMA. The conclusion (para. 5.16) is that it does not. However, the Plan makes no reference to Selby here.
- 2.10 The Council's Duty to Cooperate annexes were published in May 2018 after the Plan's submission.

- 2.11 Of particular note is the Statement to Demonstrate Compliance with the Duty to Cooperate (EX CYC 7a, Tables at 223 onwards). The summary of DTC activity shows that 867 dpa was the figure tested with a range of local authorities including Harrogate BC, Hambleton DC, Ryedale DC, Selby DC and North Yorkshire County Council, along with the Highways Agency. The use of 867 dpa is significant because:
- DTC meetings considered issues including coordinating housing levels so that development would be sustainable and concerns addressed about the potential for increased inward commuting.
 - The meeting also considered how home and jobs would be balanced.
 - The consensus at DTC meetings was that York would meet its OAN and employment needs without adding any undue pressure on the ability of neighbouring areas to meet their own assessed needs.
 - On how York’s Plan would support economic growth, DTC meetings considered that the Planned requirement of 867 dpa and the site allocations to deliver it would ‘enable people to live and work in York, thereby minimising any increasing inward or outward commuting’ (p. 225). There was further emphasis on minimising the increase in inward or outward commuting.
- 2.12 As far as we can determine, there is no further update on the DTC process and what neighbouring authorities consider to be any issues arising out of the 9% reduction in York’s housing need to 790 dpa. The Council should demonstrate in the Examination that its DTC partners are satisfied that the revised, lower figure has no adverse implications for them and the range of cross-boundary issues identified through the process.
- 2.13 If the 790 dpa figure is found at the Examination to understate the city’s future housing need, then the issues relating to additional commuting pressure and York’s ability to secure the resident workforce to support future jobs growth are at the core of those covered by the DTC process.

Relevant OAN Methodology

- 2.14 The City of York’s Local Plan was submitted prior to the January 24th 2019. This was the deadline for the submission of local plans for examination after which the revised NPPF (2018) and related standard methodology specified in the updated Planning Practice Guidance (2019) for assessing housing need applies.
- 2.15 The 2012 NPPF and the previous PPG (2014) that specifies the methodology for determining the objectively assessed need for housing (OAN) therefore applies both to how the Council has determined its housing need and to the test of the soundness of this key element of the Plan.

Changing OANs

- 2.16 The revised OAN for York is the latest in a series of OAN outputs that date back to 2013 and which have seen wide variations in the conclusions of these studies on the appropriate OAN and the figures subsequently accepted by the Council. The range of different figures is summarised in Table 2.1 below.

Table 2.1 York OAN Chronology		
Source	Annual	Period
City of York Housing Needs Update, GL Hearn (Jan 2019)	790	2012-37
City of York Local Plan – Publication Draft (Feb 2018)	867	2012-33**
SHMA Update, GL Hearn (May 2017)	953	2012-32
SHMA Addendum, GL Hearn (June 2016)	706-898	2012-32
SHMA, GL Hearn (June 2016)	841	2012-32
Evidence on Housing Requirements in York: 2015 Update – Arup (August 2015)	817-854	2012-31
Housing Requirements in York: Evidence on Housing Requirements in York: 2014 Update (Arup, September 2014)		
Assessment of the Evidence on Housing Requirements in York (Arup, May 2013)	780-800	2003-26

* Implied figure for 25 years **Extended to 2037-8 for post plan period

2.17 There are several important observations to make about this chronology that relate to the soundness of the Local Plan's OAN and related housing requirement:

- Variations in the figures concluded by the studies are substantial. We recognise that the June 2016 Addendum concluded it was reasonable to retain 841 dpa as York's OAN, but this was as part of a range that started at 706 dpa. At the high end, the May 2016 study concluded on an OAN of 953 dpa. The figure of 790 dpa now proposed by the Council is 17% lower than this high end figure. The lack of consistency in the sequence of OANs and the conclusion that the OAN should now be set at a level that is considerably lower than those previously proposed are reasons for caution about the soundness of the present figure.
- The 2014 Planning Practice Guidance is clear that the publication of new data should not necessarily lead to the revision of OAN (Paragraph: 016 Reference ID: 2a-016-20140306). Given that the GL Hearn 2019 report uses new population projections produced only two years after the preceding release, particular attention at the examination hearings on OAN should be given to the justification for the OAN to be lower on this basis. As we explain in our critical review of the Council's latest evidence, there is uncertainty about the robustness of the projections on which the 2019 evidence relies.
- It is clear in reviewing past OAN evidence that the Council has, on one occasion, not accepted the conclusions of its consultants on OAN. The 2017 SHMA Update concluded on an OAN of 953 dpa. In a Council insert into the introduction to this report, it noted that 'Hearn's conclusions were speculative and arbitrary, rely too heavily on recent short-term unrepresentative trends and attach little or no weight to the special character and setting of York and other environmental considerations. (SD 050, preface). It settled instead on a figure of 867 dpa, an OAN to which no affordability adjustment was applied. The GL Hearn 2017 figure was essentially a demographic projection (867 dpa) with a 10% affordability adjustment upward (86 dpa) giving the 953 dpa figure.

Standard Methodology

2.18 The new standard methodology for determining local objectively assessed housing need provides further context for considering the Council's proposed OAN. This is because:

- It shares with the Council's latest and previous OAN evidence the use of the 2014-based sub-national household projections (SNHP) as part of the starting point in determining housing need.
 - Its approach to incorporating in housing need assessment adjustments targeted at tackling affordability problems is consistent with a range of authoritative evidence about the scale of increases in the supply of new homes relative to demand that are required to address this important issue. We consider this evidence further later in this report.
 - It puts down very clear markers about the policy priority attached to significantly increasing the supply of housing in England, priority that is consistent with a core objective of the 2012 NPPF.
- 2.19 Application of the standard methodology to York yields an OAN figure of 1,078 dpa. Our conclusion is that a figure of this order reflects the level of housing growth necessary to support York's economic growth objectives and the city's contribution to tackling the country's housing affordability crisis.

Summary

- 2.20 In assessing the new OAN evidence submitted for examination, key contextual factors to consider include:
- The scale of difference (-9%) between the 867 dpa and 790 dpa figures and the justification for this.
 - The reference to alternative Experian jobs growth figures in the Plan's explanation about why 650 additional jobs a year is the appropriate figure to plan for.
 - Whether and how the Plan aligns future housing and jobs, an issue on which the publication version says nothing explicitly, but which is key to the Plan's soundness.
 - The wide range of OAN figures that have been proposed in the Council's evidence or taken through into drafts of the Local Plan over several years. The regularity and scale of changes should be a cause for concern about the justification for another change as the Plan enters examination.
 - Exercise of the duty to cooperate with neighbouring local authorities and whether the revised OAN figure has been appropriately considered in the DTC process.
 - The application of the new standard methodology for establishing OAN. This implies an OAN of 1,078 dpa.
- 2.21 These issues should be considered in assessing the robustness of the Council's new OAN evidence and the justification for taking forward a figure of 790 dpa into the Plan.

3. City of York Council's OAN Evidence

- 3.1 The City of York Council is now relying on the January 2019 City of York Housing Needs Update report (EX/CYC/9) produced by GL Hearn for its preferred OAN of 790 dpa. The soundness of this new evidence as the basis for York's OAN and housing requirement must be assessed against both its consistency with the methodological approach specified in the PPG (2014), the robustness of the data and assumptions that underpin it, and the conclusions GL Hearn draws in its recommendation to the Council.
- 3.2 The PPG essentially specifies a methodology for determining OAN with the following main components:
- Determining the appropriate housing market area (HMA) and assessing need for this area (PPG Paragraph: 008 Reference ID: 2a-008-20140306).
 - Starting with the latest official household projections (PPG para. 015 Reference ID: 2a-017-20140306).
 - Making adjustments to the household projections where evidence about the demographic and household projections that are the basis for the starting point justifies it (Paragraph: 017 Reference ID: 2a-017-20140306).
 - Taking account of employment trends by considering the likely change in job numbers based on past trends and/or employment forecasts, and specifically to the growth of the working age population (future labour supply) in the HMA (Paragraph: 018 Reference ID: 2a-018-20140306). Any mismatch between future labour supply and jobs growth should lead to consideration of how new housing might address the problems it raises (unsustainable commuting, reduced business resilience, unmet housing need).
 - Potentially upward adjustments intended to address affordability problems using a range of market signals evidence to determine the scale of affordability adjustments required (PPG paras. 019-020). The purpose of a reasonable upward adjustment is to increase planned supply relative to assessed future demand represented by the household projections (PPG Paragraph: 020 Reference ID: 2a-020-20140306).
 - Determine the types of housing needed (Paragraph: 021 Reference ID: 2a-021-20140306).
 - Assess affordable housing need (PPG paras. 021-029) and consider this need in the context of its likely delivery as a proportion of future housing development and specifically market housing development. Plan makers should consider increasing the housing figures in the Local Plan where it could help to deliver the required number of affordable homes (Paragraph: 029 Reference ID: 2a-029-20140306).
- 3.3 Our review in this section shows that, on several grounds, the evidence and the 790 dpa figure that arises from it in the Local Plan fall short in the application of the PPG methodology and in meeting the objectives at which the 2014 PPG and 2012 NPPF is directed.

Housing Market Area

- 3.4 The 2019 Update on Housing Need (EX/CYC/9) is silent on York's housing market area and the implications for the HMA of the new evidence it considers. This is an important omission. The downward revision of the OAN and the lower housing requirement for York that follows from it has implications for plan-making in the HMA and neighbouring local authority areas, including housing supply and potential unmet need in other areas, the

sustainability of future commuting patterns, the ability of the York HMA and other areas to support economic growth, and effects on affordability. There is no evidence to indicate how these issues have been considered either by the Council or through the duty to cooperate process.

- 3.5 The 2016 SHMA (SD051) concludes that York is part of a complex series of overlapping housing market areas, and that covers the City of York and Selby (para. 2.104). Since Selby had produced in its own SHMA, the study did not consider it necessary to determine the OAN of the housing market area as a whole (ie York and Selby), but instead treated York separately.
- 3.6 This approach has then been carried forward into subsequent updates, including EX/CYC/9 and the 2017 SHMA Update (SD050). The publication Plan says little about York's HMA.
- 3.7 At the very least, the Examination should consider how the Council has or intends to address the questions that the adoption of a lower housing need figure raises, which include:
- Whether it will provide the level of housing growth necessary to support future population growth in York and across the HMA. If not, whether this implies that unmet need may arise for York that could impact upon planned housing supply in neighbouring areas.
 - Whether it will support likely future employment growth in York and the HMA, particularly the issue of growth in the resident labour force necessary to support future jobs. If not, then this also has potentially adverse implications across the wider area including a need to draw more on the labour force of other local authority areas, the additional commuting that may follow from this and the ability of other areas to support the future employment growth they are planning for.
 - Whether the lower OAN represents an appropriate response to tackling poor affordability in York and the HMA. A worsening of affordability in York has implications for the housing need and housing supply in other areas, in that households who might otherwise choose to live in York (for example, people working in the city) will instead opt for homes elsewhere in more affordable areas.
- 3.8 These are issues at the core of the exercise of the duty to cooperate.

Starting Point Projections

- 3.9 The PPG (para. 015) establishes that Government household projections are the starting point in assessing housing need. These are based on ONS population projections, which are translated into projected household growth through a series of modelling assumptions. Their conversion into dwellings growth is not described in the PPG method, but is typically based on making an appropriate allowance in the household growth figures for vacant homes. Future household growth will not neatly translate into future dwellings growth, since at any given point in time a proportion of dwellings will be empty for transactional reasons (eg. unoccupied temporarily as a result of house sales), long-term empty or in use as second homes (so effectively occupied by another household).

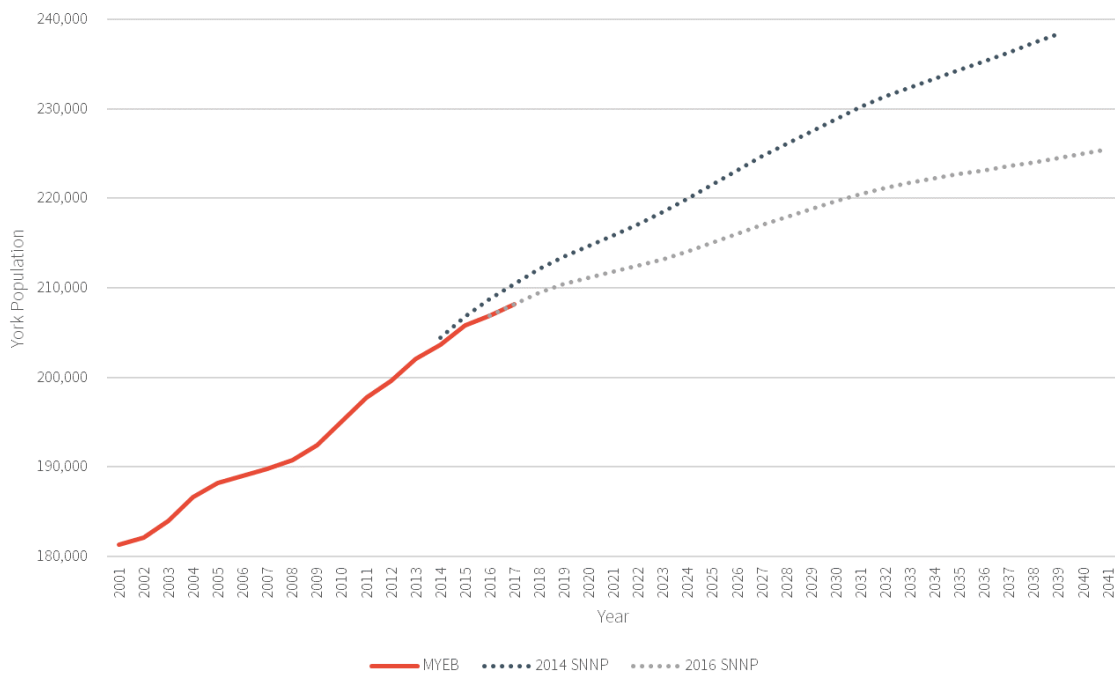
Population Projections

- 3.10 The first, substantive change that arises in the 2019 Housing Needs Update (EX/CYC/9) is that the most recent (2016-based) ONS population projections are now deemed to provide the appropriate starting point population figure for York. The 2016-based projections assume much lower annual growth in population for York than that of both the 2014 and 2012-based projections.

3.11 How the headline figures compare with earlier projections including those which provided the basis for earlier OAN figures is set out in Table 3.1 below. Figure 3.1 gives a visual indication of the difference in the trajectory, which suggests that SNPP 2016 assumes a sharper slow down in population growth compared to past trends and earlier projections.

Table 3.1 Population Projection Comparison for York					
	Total Pop Growth	Annual Growth	% Change	Annual % Change (CAGR)	Period
2016 Based Projections	17,622	766	7.8%	0.36%	2016-39
2014 Based Projections	29,622	1,288	12.7%	0.58%	2016-39
2012 Based Projections	23,309	1,110	11.3%	0.51%	2016-37

Figure 3.1 Population estimates and projections



Source: ONS, Subnational Population Projections 2014, 2016; ONS, Mid-Year Population Estimates, 2018

3.12 Explanation of the changes between the 2014 and 2016-based projections is given by GL Hearn in EX/CYC/09 (para. 2.5) and centre on the output of the national population projections on which the sub-national projections are based.¹ In summary the key factors it identifies are:

- Downward revisions to long-term international migration assumptions so that they average 165,000 per annum (beyond mid-2022) compared to 185,000 in the 2014-

¹ Sub-national population projections are based on a cohort component methodology drawing on mid-year population estimates for local authority areas. The national population projections are important because the projections for each area are constrained to the national projection by applying scaling factors.

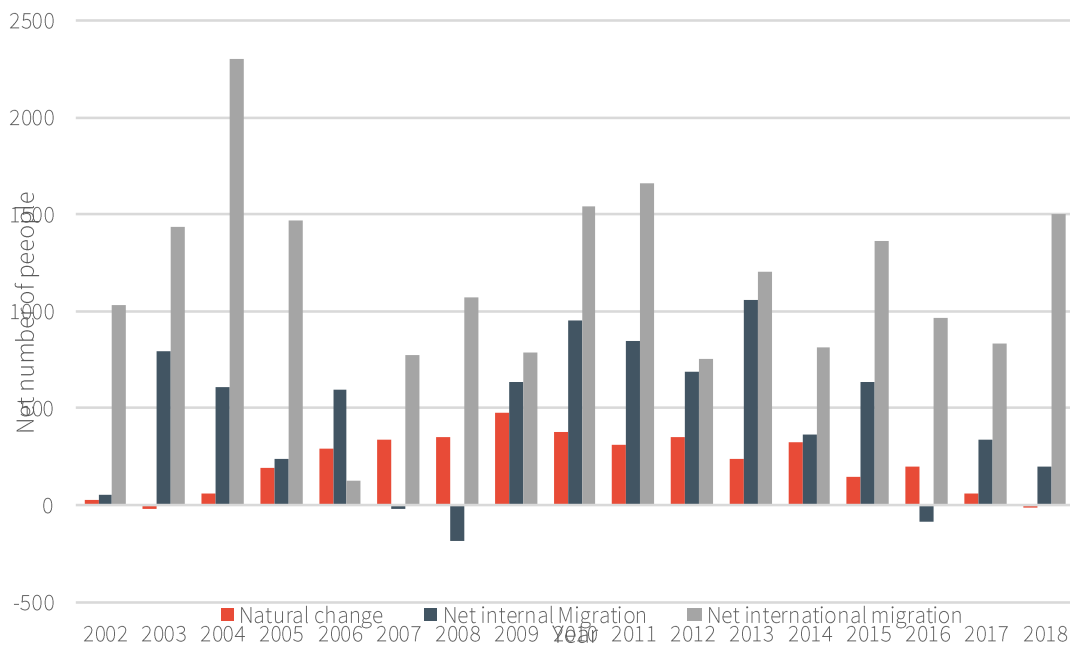
based projections over a 25 year period. This affects the future number of migrants from overseas assumed to entering, remaining and leaving the UK.

- The assumption that women will have fewer children than was assumed in the 2014-based projections. This affects future natural population growth.
- The assumption that increases in life expectancy would not be as fast as was assumed in the 2014-based projections. This also affects projected future natural change in the population.

3.13 These are differences in the national projections. To understand the implications for York, EX/CYC/09 sets out how these changes relate to recent trends in York, and what this implies about the reasonableness of the more recent projections compared to the earlier projections (para 2.6, Figures 2,3,4).

3.14 In considering the robustness of the study’s justification for preferring SNPP 2016, it is important to take account of past population change. Each of the main components of past change that EX/CYC/9 addresses is shown in the figure below.

Figure 3.2 Components of past population change in York, 2002-2018



Source: Office for National Statistics, Mid-Year Population Estimates

Natural Change

3.15 On natural change, EX/CYC/9 finds that recent trends in net natural change (births-deaths) are more consistent with the 2016-based projections than the earlier projections (para. 2.7). However, it does so on the basis of a brief comment that past trends do not have an obvious relationship with past trends (para. 2.6).

3.16 In Figure 2, EX/CYC/9 plots past trends and project changes in the 2016 and 2014-based projections. The figure is unhelpful, in that it makes no reference to average past changes across different periods, and how these compare with projected natural change.

- 3.17 The study suggests there is a ‘recent trend’ for falling rates of natural change which is part of its justification for accepting SNPP 2016 over SNPP 2014. It is not clear what recent period is being referred to, but Figure 2 suggests it may relate to the fall in internal migration from 2013 (ie a short period from 2013-17). This is a very short period on which to base a conclusion about natural change in the long term, and not one which should be relied upon as a guide to how long-term natural change might evolve. Instead, the study should have considered in more depth past trends.
- 3.18 We have summarised how average annual past change over different time periods in York compares with projected change from 2017-39. The data do not immediately suggest that SNPP 2016 is demonstrably a better fit than SNPP 2014 with past trends data. With the exception of the 5 years to 2018, which are skewed by a very low figure of 62 in 2017 and -11 in 2018, past averages lie between the long-term averages assumed in both projections.

Table 3.2 Comparing Past and Projected Natural Change	
Projected and Past Change	Annual Average
SNPP 2014 (2018-39)	379
SNPP 2016 (2018-39)	122
Past Change (2002-18)	218
Past Change (2007-18)	257
Past Change 2012-18	160

Source: Office for National Statistics, Mid-Year Population Estimates; Sub-national Population Projections (2014 and 2016-based)

- 3.19 It is also important to note that, if the most recent figures for 2017 and 2018 are excluded past averages are somewhat higher than those described in the table above. The most recent figures are levels of natural change which represent annual averages not reported in the mid-year population estimates since the early 2000s.

Internal Migration

- 3.20 On internal migration, EX/CYC/9 finds that projected net internal migration (ie moves within the UK) is actually higher in SNPP 2016 than in SNPP 2014. How projected domestic migration compares with past trends is shown in Figure 3. Again, the figure gives little insight into how the past compares with the future, since projected trends look very different to the annual peaks and troughs in internal migration that are a feature of the data.
- 3.21 Analysis of the past data and the projections suggests that neither SNPP 2014 or 2016 are consistent with rates of past net internal migration into York. As Figure 3.2 above shows, the past population figures show considerable variation in internal migration from year to year. However, they average at reasonably consistent annual figures over different time periods to 2017. It suggests that both SNPPs for York are projecting much lower net internal migration than past trends.

Projected and Past Change	Annual Average
SNPP 2014 (2018-39)	-213
SNPP 2016 (2018-39)	37
Past Change (2002-18)	453
Past Change (2008-18)	495
Past Change (2013-18)	417

Source: Office for National Statistics, Mid-Year Population Estimates; Sub-national Population Projections (2014 and 2016-based)

International Migration

- 3.22 By far the biggest difference between SNPP 2016 and 2014 is assumed future international migration, as EX/CYC/9 rightly observes. SNPP 2014 assumes a substantially higher annual average will be maintained than SNPP 2016. Again, however, there is little discussion in the Council's evidence about why this is the case. The projected figure for York in 2016 is far below past averages, as the table below shows. Past annual averages over the three periods we have considered are clearly consistent with the long-term annual average assumed in SNPP2014.

Past and Projected Change	Annual Average
SNPP 2014 (2018-39)	1,152
SNPP 2016 (2018-39)	618
Past Change (2002-18)	1,155
Past Change (2008-18)	1,136
Past Change (2013-18)	1,114

Source: Office for National Statistics, Mid-Year Population Estimates; Sub-national Population Projections (2014 and 2016-based)

- 3.23 We recognise that the ONS cites changes to its method for estimating international migration, and particularly emigration, as one of the key improvements to population estimates that are carried through into the SNPP 2016. This has always been one of the more complex aspects of population data, and one subject in the past to larger discrepancies and errors in population estimates. There is also some uncertainty about future migration policy related to the UK's exit from the European Union, but this cannot yet be taken into account in objective, technical projections.
- 3.24 However, projected change in net international migration in SNPP 2016 for York appears wholly inconsistent with past trends data.
- 3.25 In EX/CYC/9, there is further reference (Figure 3) to recent international migration data². The study suggests that a comparison of projected and actual recent international migration shows that SNPP 2016's projection for 2016-17 (ie a single year) was much closer to the actual figure given in the population estimates than SNPP2014.
- 3.26 Notwithstanding the flaw in relying on one year of data to justify a preference for SNPP 2016, we show in the table below that the latest figures (2018) point in the opposite direction, with net international migration higher than SNPP 2014 projected, and nearly double the figure suggested by the 2016 SNPP.

² There is an error in the description of the table, since the data actually show international migration rather than simply all recorded migration.

	MYE	2014 SNPP	2016 SNPP
2014-15	1,360	1,844	-
2015-16	968	1,489	-
2016-17	831	1,366	808
2017-18	1,505	1,332	773

Source: Office for National Statistics, Mid-Year Population Estimates; Sub-national Population Projections (2014 and 2016-based)

- 3.27 We do not attach significant weight to these very recent figures. Rather, they simply serve to underline the point that the analysis in EX/CYC/9 and the data that underpins it does not provide any clear cut justification to treat SNPP 2016 as a substantially more robust basis for establishing future population growth in York when past trends and current data are considered.
- 3.28 The justification EX/CYC/9 gives to prefer SNPP 2016 also includes brief analysis of the Patient Register as a check on recent population change. The Patient Register has been published with ONS population estimates as one of a number of additional administrative data sources that provide a sense check on the estimates.
- 3.29 The Patient Register data reported in EC/CYC/9 show that population change from 2011 to 2017 appears 2,000 lower than suggested by the ONS MYE. We note that there was a substantial difference in the recorded population between the Patient Register in 2011 and the MYE for that year, with the former 5,700 higher than the MYE.
- 3.30 In a city in which there is a substantial student population, the Patient Register may not be a reliable guide as to who is moving to and leaving a city, since students more likely to leave without deregistering and arrive without registering than the general population. The ONS has recognised this³, and has supplemented its analysis of the Patient Register with Higher Education Statistics Agency data (HESA) to address the issue of student registration.
- 3.31 Comparison of the most recent population estimates and Patient Register shows that the difference in the growth rates that each source captures has narrowed to 0.5 percentage points from 1.2 percentage points in 2017. Given the improvements the ONS has made to both the MYE and the Patient Register, the data do not provide any compelling grounds to indicate that the SNPP 2016 should be preferred as a source of future projections.

	2011	2017	Change 2011-17	2018	% Change 2011-18
Mid-Year Estimates	197,790	208,200	5.3%	209,900	6.1%
Patient Register	203,430	211,870	4.1%	214,910	5.6%

Source: Office for National Statistics, Mid-Year Estimates Comparator Tool, 2019

Housing Completions

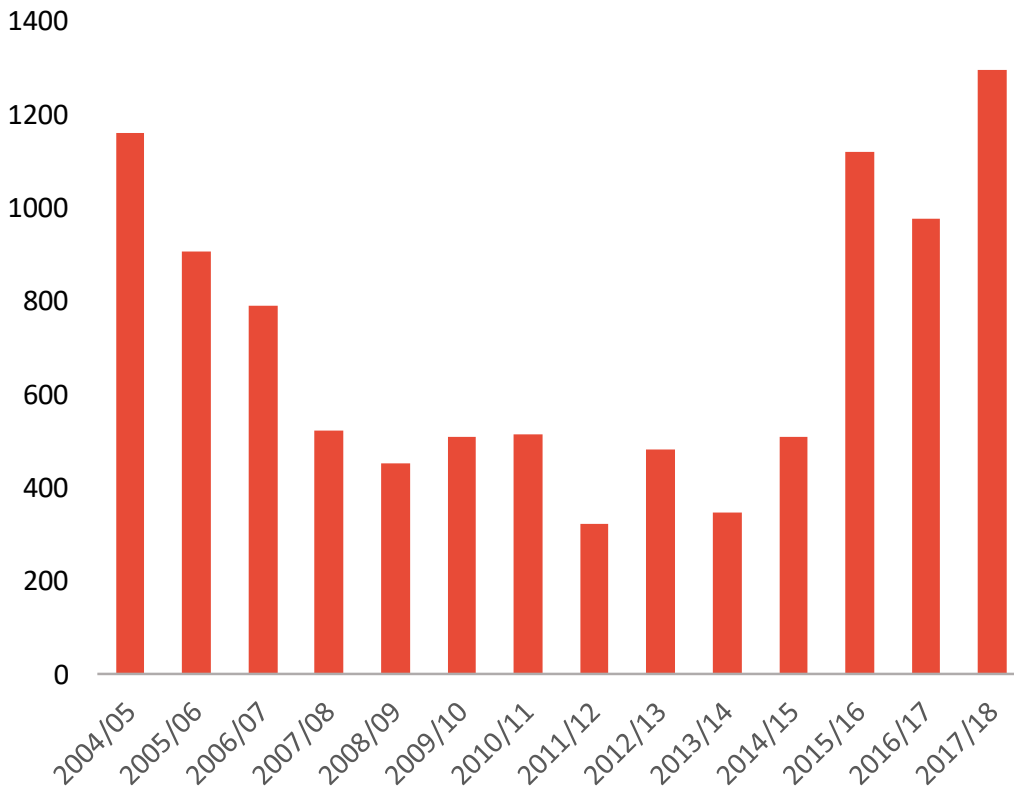
- 3.32 The backdrop to past population change in York is the level of housing growth the city has delivered. The relationship between housing completions and population change is a complex one for which there is no reliable source of official data. However, simple analysis

3

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/methodologies/patientregisterqualityassuranceofadministrativedatausedinpopulationstatisticsdec2016>

of completions data for York shows that it went through an extended period from 2007 when housing completions were far below the levels of housing need identified in the Council’s evidence and the proposed Plan figure.

Figure 3.3 Net Housing Completions, York, 2004-18



Source: City of York Council, Annual Monitoring Reports

- 3.33 Average completions from 2007-18 were 652 per annum, but this includes a more recent period when York has seen higher completions levels. From 2007-2015, average completions stood at 456 per annum, far below the proposed requirement in the Plan and past housing targets.
- 3.34 The Council’s Annual Monitoring Reports also note that student dwellings are included in some completions figures. For example, the 2015-16 Annual Monitoring Report (AMR), shows net completions of 1,121. However, the AMR makes it clear that 52% of these were of off campus, privately managed student accommodation. Of 482 net completions reported in the 2012/13 AMR, 124 were described as ‘student cluster flats’. The implication is that completions of housing for the general population may be lower still than the net completions figures.
- 3.35 It is not possible to demonstrate precisely how this has influenced actual versus projected population growth. However, it is reasonable to conclude that past rates of housing growth have been a constraint on population growth within York’s boundaries, and that this is likely to be reflected both in the population estimates and in the latest projections.
- 3.36 The relationship between housing growth and population growth is not addressed in EX/CYC/9. The 2014 PPG is clear that past undersupply of housing is amongst the factors which should be considered in housing need assessment since it may affect the official starting point projections of household change (paragraph 015, ID 2a-015-20140306).

Furthermore, UK Government statements and ONS commentary on the 2016-based household projections recognise that past housing development rates and the under-supply of housing will have been reflected in household projections.⁴ How the SNPP 2016 for York and the related household projections reflect past rates of completions is an issue which should have been addressed in the Council's evidence, and which should be considered in the Examination.

Adjusting the Demographic Starting Point

- 3.37 It is good practice in housing need assessment to consider whether there are grounds to future population growth to follow a different trajectory. The PPG (paras. 015 and 017) is clear that factors affecting population change and migration could include the supply of housing, major employment developments and education developments.
- 3.38 Typically, the case for making adjustments involves considering how longer term past trends in population change might influence the projections. Since the SNPP is based on population trends in the 5-6 year period leading up to year 1 of the projection, the use of longer term past trends is an appropriate alternative.
- 3.39 In EX/CYC/9, a past trend scenario using 10 year trends in migration is applied. The results are compared in Table 5, which shows that a 10 year migration scenario produces population growth of 13.1% from 2012-37, a figure slightly higher than SNPP 2016 but substantially lower than SNPP 2014 (+18.2%).
- 3.40 It is impossible to comment in any meaningful way on the robustness of the approach for the alternative scenarios. There is no detail on any of the assumptions that have been used, including the years in the 10 year reference period. A review of SD052 (June 2016 SHMA, para. 1.8) suggests that it is likely to be the 10 years prior to 2016, an assumption that would be consistent with the assumption used in that study.
- 3.41 We have reviewed past migration data and it is likely that the alignment of the 10 year scenario and SNPP 2016 reflects net migration levels which appear broadly similar in the relevant reference periods (c. 1,500) per annum. The 10 year period to 2016 includes several years when migration levels fell 2006-09, a point acknowledged in the earlier City of York SHMA Assessment Update (SD050) at para. 2.6.
- 3.42 It is also notable that SD050 concludes that the longer-term migration scenarios tested in that study
'should not be given any greater weight than the figures emerging from official statistics' (para. 2.9).
- 3.43 It analysis of longer-term past trends (14 years) showed significantly higher levels of population growth than the 10 year trend (SD050, Table 1). Its conclusion was that the official projections should be preferred, and that they should be
'seen as a positive step to consider these as the preferred population growth scenario. We have therefore taken forward the official projections and those updated with the most recent date for further consideration. Any other sensitivity would result in a lower housing need but this would not be defensible given the very strong recent trends' (SD050, paras. 2.11-12).
- 3.44 The Council's latest housing need evidence (EX/CYC/9) does not draw any clear inference from the alternative demographic trend. Since the approach lacks any transparency and is inconsistent with the earlier position on alternative trends versus the official projections,

⁴ MHCLG (2018) Technical consultation on updates to national planning policy and guidance

the study provides no justification why SNPP 2016 should be the preferred population projection.

Student Population

- 3.45 The Council's evidence makes no reference to the city's student population, how projected changes in the younger adult population in SNPP 2016 relates to it, and what this implies about future housing.
- 3.46 This is an important omission in the treatment of the latest evidence in EX/CYC/9 for three reasons. First, York has a substantial student population, with the latest data from the Higher Education Statistics Agency (HESA) indicate a total enrolment of 25,075 students at the University of York and York St. John University, the two HE institutions in the city. This amounts to 12% of the total population of the city in 2018.
- 3.47 Second, student numbers in York have continued to grow during this decade, increasing by 11% since 2013/14 to 2017/18. Whilst the pace of growth has slowed compared with earlier years and linked to the construction of a new campus at the University of York, growth is still clearly evident.

	York St. Johns	University of York	Total
2013/14	6,105	16,469	22,574
2014/15	6,550	16,835	23,385
2015/16	5,980	17,155	23,135
2016/17	5,940	17,900	23,840
2017/18	6,250	18,825	25,075

Source: Higher Education Statistics Agency

- 3.48 Third, the Council's earlier SHMA evidence attached significant weight to the presence of the student population and how this impacted upon the official population and household projections. In the 2016 SHMA Addendum (SD 052), the study suggested a need for caution about the extent to which SNPP 2014 projected forward past growth in student numbers that might not be expected to continue into the future. By the 2017 SHMA Addendum (SD050), the Council's consultant was explicit (para. 5.21) that the projections should not be adjusted for past change in the student population, giving the housing need figure of 867 dpa.
- 3.49 Current population estimates (2018) indicate a total of 20,100 young people aged 18-21, and 31,800 in the 18-24 population. The 18-21 cohort would be expected to include the majority of undergraduates, with the 18-24 cohort including post-graduate students. The SNPP 2016 on which the Council now relies shows that the 18-21 cohort is projected to stand at 20,750 by 2037, and the 18-24 cohort to increase by only 1,400. The latest projections assume essentially a static picture in the younger age group, despite evidence that the city's student population has continued to expand.
- 3.50 Given its past evidence and the importance of the student population in the city, this is an issue which should be considered at the examination in determining whether it is appropriate to rely on SNPP 2016.

Household Projections

- 3.51 Projected population change is translated into households using household representative rates (HRR), essentially the propensity of people of different ages to form independent households.
- 3.52 Household projections to accompany the 2016-based population projections were issued in 2018. However, the Government made it clear through in its consultation on changes to the methodology for assessing housing need (para. 19) that the 2014-based projections should continue to be used in the short term.⁵ EX/CYC/9 (para. 2.18) suggests that the reason for this lies in the Government's target of 300,000 homes a year, and the issue that planning on the basis of the lower, 2016-based household projections would not achieve this target.
- 3.53 This over-simplifies the Government's explanation of why the decision was made. This is set out in the consultation on the new method, and the key points are distilled below:
- Methodological changes in the 2016-based projections included reducing the past trends period on which the projections were based from five to two Census points (2001 and 2011). This means that a period during which there has been a sustained increase in house prices, worsening affordability and recession is used as the basis for the future projection rather than the previous use of a period from 1971 which better represents long term trends.
 - There has been historic under-delivery of housing over an extended period. This has resulted in pent-up demand which, as the ONS acknowledges, is not captured in the projections. Where housing has not been available in areas it is needed, then households may not be able to form.
 - The projections are based on actual numbers of households, and so where there have been constraints on household formation, these are projected forward.⁶
- 3.54 It is difficult to measure the level of pent up demand/need. However, the Government's consultation document highlights studies which have shown that 250,000 homes a year are needed compared with the 213,000 a year implied by the new projections. The Government's position is that 300,000 homes a year are needed to also address deep rooted affordability problems and ease house price inflation.⁷
- 3.55 In EX/CYC/9, the response to the problems with the 2016-based household projections is to test scenarios using the HRR from the 2014-based projections.
- 3.56 The study acknowledges (para. 2.21) that the 2016-based projections lock in deteriorating household formation rates, showing in Figure 5 that the issue is particularly prominent for the 25-34 year old cohort, but also evident in the 35-44 cohort. The younger age group is worst affected by poor affordability and under-supply.
- 3.57 To address this issue, it tests a scenario in which future rates of household formation in the 25-44 age group are assumed to return part way to trends from the 2008-based household projections. This is widely assumed to represent projections that pre-dated recent sharper falls in household formation rates in younger age groups, and was an approach suggested by the Local Plans Expert Group.
- 3.58 We have no particular issue with the approach adopted in EX/CYC/9 on this aspect of the OAN calculation. As is the case with other aspects of the method used, there is little detail

⁵ MHCLG (2018) Technical consultation on updates to national planning policy and guidance

⁶ Ibid, paras. 9-15

⁷ Ibid, para. 14

to understand how the adjustments are applied, and how far the adjustment towards 2008-based rates better reflects the long term trend and a position in which the locked in problems of under-supply and affordability are offset.

- 3.59 The outcome (EX/CYC/9, Table 6) underlines the magnitude of difference between the 2016-based projections and the earlier projections. Without any adjustment, use of the 2014-based figures results in household growth of 610 per annum, a figure which is 30% higher than the 470 per annum implied by the use of the SNPP 2016 rates.
- 3.60 The difference is not only attributable to younger age cohorts, but reflects the overall effect of both changes to the methodology and estimates of how household formation has continued to change recently in the face of sustained affordability pressures.
- 3.61 The additional sensitivity linked to the 2008-based projections adds a further 50 households to the 610 per annum figure, giving an adjusted starting point of 670 per annum, or an adjustment of 8%.
- 3.62 Having carried out these reasonable adjustments, EX/CYC/9 then appears to conclude that the lowest of the figures (ie 470 households per annum) should be considered as the base projection for York. Given the issues highlighted in the study, it is not clear why this is the appropriate conclusion to draw. At the very least, treating the unadjusted 610 per annum figure derived from the 2014-based HRR would be more consistent with the analysis.

Student Households

- 3.63 Whilst the majority of 18-19 year olds at the University of York live in accommodation provided by the university itself (ie institutional accommodation), student households are an important feature of the private rented sector in the city. By giving no consideration to the question of whether the SNPP 2016 reasonably accounts for likely change in student numbers, there is clearly the potential to exclude an element of future housing need linked to this population. This is an issue which should be considered at the examination.
- 3.64 Analysis in SD 051 (paras. 10.57-10.68) used Census 2011 to show that substantial numbers of students, particularly those aged 20-24, resident in student households assumed to be non-institutional accommodation and likely to be in the private rented sector. The data showed around 8,150 students in this form of accommodation, with the number having increased markedly since 2001.
- 3.65 The last decade has seen further development of university owned halls, but also expansion in private rented accommodation provision in the city. The 2016-based household projections indicate an increase of only 300 from 2018-37 in households in which the reference person (assumed to be the oldest economically active member of the household) is aged 20-24. This is indicative of an assumption that there will be little growth in the student aged population of the period to 2037, and may be grounds to consider whether population and household growth assumptions should be adjusted upwards to address this issue.

Vacancy Rate

- 3.66 The Council's 2019 study applies a vacancy rate of 3% to convert households into dwellings (EX/CYC/9, para. 2.26), describing it as a 'fairly standard number'. This contrasts with a rate of 3.8% used in the 2016 study (SD052) and an implied rate of 2.5% in the 2017 study (SD050, para. 2.16). Clarification should have been provided about the rationale for adopting the 3% figure, since it has some impact on final dwellings figures.
- 3.67 With the vacancy assumption applied, the equivalent annual dwellings figures from the starting point and adjusted projections scenarios are 484 dpa (2016-based), 629 dpa (2014-based HRR) and 679 dpa (part return to trend).

- 3.68 The study adopts the lowest of these figures (484 dpa) as the starting point against which an adjustment for market signals is tested. This is important, because it forms part of the judgement EX/CYC/9 reaches about the appropriate OAN from the range of figures it presents. It is a substantially lower figure than the 867 dpa implied by the 2014-based projections and which, until January 2019, was the Council's preferred OAN.

Summary

- 3.69 Our review of the population and households evidence that underpins the Council's OAN figure points to the following flaws:
- A lack of transparency about the assumptions used, which makes it difficult and in some respects impossible to determine the robustness of the figures. Since the Council is now relying on this evidence to underpin its Local Plan requirement, these are assumptions which should be available and tested in the Examination.
 - Justification for the use of SNPP 2016 as the basis for OAN which relies on very short-term trends in population data, fails to thoroughly consider the relationship between past trends and future population projections, and which does not recognise the role that an under-supply of housing have played in population growth.
 - Applies adjustments to the demographic projections which earlier studies by the Council conclude should not override the official projections.
 - Applies reasonable adjustments to future household formation rates, but then treats the 2016-based projections output as the appropriate starting point projection. This is despite clear statements from the Government that the latest projections should not be used in housing need assessment, and that they lock in the substantial affordability problems affecting in particular younger age groups.
- 3.70 Our conclusion is that the Council's evidence provides no robust justification to depart from projections that emerged from its earlier work, and for the use of the 2014-based projections as an appropriate starting point. This would imply a starting point OAN of 867 dpa.

Economic Growth and Housing Need

Future Jobs Growth

- 3.71 A figure of 650 jobs a year, or 11,050 jobs over the period from 2014-31, is accepted as the appropriate employment growth against which to assess housing need (EX/CYC/9, para. 3.4). This is the figure carried forward into the Local Plan, and which provides the basis for its allocation of employment land for B use classes. It equates to an annual growth rate of around 0.54% per annum.
- 3.72 Through a series of assumptions about jobs, the population and future labour force, the Council arrives at the conclusion that the OAN necessary to support 650 jobs a year is 790 dpa over the 25 years from 2012-37 (para. 3.19).
- 3.73 The 650 per annum figure is drawn from the Employment Land Review (ELR) Update, September 2017 (SD063). It is a scenario based on adjusting Oxford Economics (OE) employment forecasts (described in SD064) to reflect some recent local evidence on sector growth in the city.
- 3.74 SD063 also shows forecast jobs growth from an alternative model, the Regional Econometric Model produced by Experian for Yorkshire and Humber local authorities. The most straightforward comparison of the two models is given in Table 1. It shows that:

- The baseline Oxford Economics model assumes jobs growth of 9,807 or 612 jobs a year from 2015-31.
 - The Experian/REM model shows growth of 12,900 jobs or 806 per annum over the same period.
- 3.75 It should be noted that the Experian forecast is more recent (December 2016 v. May 2015) than the OE forecast. Commentary in SD063 points to differences in assumptions about future jobs in health and social care (paras. 2.6-7) which are significantly higher in the Experian output, attributable to the model assuming nationally that an ageing population will be a key driver of jobs in this sector. The OE model assumes a largely static position in jobs in these sectors to 2031. The other component of difference relates to the accommodation and food sector, with the Experian model assuming more than 1,100 more jobs in accommodation, food and recreation than OE, a picture consistent with York's status as a major tourism destination.
- 3.76 The 2017 study (SD063) confirms that the Experian output should also be regarded as a robust view of future employment growth. It points out (para. 2.3) that the REM from which the forecasts are drawn is used across West and North Yorkshire, including for local planning and forecasting purposes. In describing the differences between the two forecasts, it observes also (para. 2.7) that:
- 'Neither is necessarily more accurate than the other, but simply different assumptions will have been applied'.*
- 3.77 For several reasons, it is not clear why the Council's OAN study does not consider the implications of the higher, Experian employment growth figure of 806 per annum:
- The conclusion in the 2017 ELR that neither of the two forecasts is necessarily more accurate than the other.
 - The clear conclusion in the 2017 ELR (para. 2.12) that in establishing what provision should be made for future land for B1a, B2 and B8 uses, it has sought to ensure that there is headroom to meet both the OE and Experian projections for B class employment uses. The OE forecast projects higher B class needs than the Experian forecast, but lower overall jobs growth. In other words, the employment land figures that emerge from the ELR are intended to enable York to deliver the jobs growth implied by both scenarios.
 - Earlier versions of the SHMA had indicated higher jobs growth figures from forecast models, including 868 a year and 789 a year from 2012-31 (SD051, Table 23).
- 3.78 The 2019 OAN study has therefore considered only one jobs growth scenario when its own evidence points to higher employment growth. The figure of 806 jobs a year should therefore be assessed for its implications for future housing need, since it is a jobs growth figure that might reasonably be expected to occur based on the Council's own conclusions.

Aligning Jobs and Housing

- 3.79 The PPG is clear that future jobs growth should be assessed in determining the appropriate OAN. Specifically, para. 018 (ID 2a-018-20140306) indicates that growth in the working age population and the economically active population (labour supply) should be considered, with housing a response if there is an evident mismatch between future jobs and labour.
- 3.80 To assess this alignment, a series of assumptions are required to translate the future population into a projected labour supply. It does so for the period from 2017-37. These are set out in EX/CYC/9 at paras. 3.5-3.15 and we comment on each of the key assumptions.

Resident Working Age Population

- 3.81 As the UK's population ages and the state pension age increases, growing numbers of older people are remaining in work past what has historically been considered retirement age. Data given in EX/CYC/9 (Table 9) shows that there are significant proportions of the population aged over 65 who are economically active and this is expected to increase.
- 3.82 The starting point in considering workforce change is therefore to consider the broad working age population and how this will change. As the SNPP 2016 in Table 3.8 below shows, there is projected to be only very modest change in the core of the resident working age population (16-64) in York, amounting to net 1,751 or just 87 a year from 2017-37. By contrast, the population over 65 is projected to increase by around 12,500.

	2017	2037	Change 2017-37
16-29	50,802	54,473	3,671
30-49	50,566	51,332	766
50-64	36,153	33,467	-2,686
65-74	20,127	24,089	3,962
75-89	15,657	23,267	7,610

Source: Office for National Statistics, 2016-based Sub-national Population Projections

- 3.83 This immediately points to a potential mismatch between future jobs growth and the labour force, and to dependence on both the older population and increasing economic activity rates to achieve labour force growth. By contrast, the SNPP 2014 suggests growth in the 16-64 cohort of around 7,500 over the same period, representing more substantial growth in the size of the resident labour supply.

Economic Activity Rates

- 3.84 The second step is to assess how many additional people in the future population will be economically active (ie in or available for work). The Council's evidence uses Office for Budget Responsibility national projections for changes in economic activity (EA) rates by age group (EX/CYC/9, Table 9). These are applied to the current and projected population to determine how many additional economically active people will be available by 2037.
- 3.85 The Council's study does not show how the rates it applies translates into the additional workforce. However, we have taken the figures from Table 9 and applied them to the population for 2017 and the projected population in 2037 from SNPP 2016. This gives the totals shown in Table 3.9.

	Additional EA Males	Additional EA Females	Total
16-64	2,941	327	3,267
65+	1,571	2,276	3,847
Total	4,512	2,602	7,114

Source: EX/CYC/9 Table 9; Office for National Statistics, Mid-Year Population Estimates

Commuting

- 3.86 The Council's approach to commuting is to draw on the 2011 Census to determine a ratio of people working in the city to those living in the city. This ratio of 0.959 indicates that

there were more people working in the city in 2011 than residents of the city in work. This is consistent with an area that draws on the workforce of other areas for part of its labour supply, with in-commuting amounting to around 25,700 in 2011 compared to 21,500 out-commuting.

- 3.87 This underlines the need for changes in York's proposed housing need being considered as part of the exercise of the duty to cooperate.

Double Jobbing

- 3.88 EX/CVC/9 applies an allowance for future jobs held by more than one person. The source of this double jobbing figure is a reasonable one, using long term past data from the Annual Population Survey. However, the study cites a figure of 3.3% (para. 3.6) but appears in Table 7 to apply a higher rate (3.9%). We have checked the long-term averages from the APS and the appropriate figure appears to be 3.9%.

Housing Need Linked to Jobs Growth

- 3.89 The calculation set out in EX/CYC/9 Table 8 shows how the Council's study arrives at a future resident labour force requirement of 11,976. This is then translated into housing need figures, giving a range from 590 dpa using the 2016-based projections to 735 and 790 dpa using the 2014-based projections and the HRR adjustments.
- 3.90 We show in the below how the Council's calculations work through to additional housing need using the 650 and 806 jobs per annum figures. Applying the same ratio of dwellings to additional workers translates into an additional 169 dwellings per annum over the 25 year period. This simply uses SNPP 2016 and the 2016-based household projections.
- 3.91 It is not possible from EX/CYC/9 to assess the robustness of the assumptions which lead from additional labour to housing, since no detail is provided on the age characteristics and household formation of the additional net migration that the modelling assumes are needed to fill the shortfall in future labour. However, we have applied the ratio of extra labour to housing need (1.835) implied by EX/CYC/9 to calculate this for the 806 jobs a year scenario. This ratio essentially suggests that there are just over 1.8 extra workers per additional dwelling.

Table 3.10 Future Jobs, Labour and Housing Need, 2012-37

	Council's Preferred Jobs Growth	ELR Evidence (Experian/REM Forecast)
Jobs growth a year, 2017-37	650	806
Total extra jobs 2017-37	13,000	16,120
Jobs growth adjusted for double jobbing (3.9%)	12,493	15,491
Additional residents in work needed, allowing for commuting (0.959 labour force: jobs ratio)	11,976	14,856
Resident labour force growth implied by SNPP 2016	7,114	7,114
Shortfall in future resident workforce	4,862	7,742
Additional housing need (2012-37)	2,650	4,220
Ratio of future resident workers: additional dwellings	1.835	1.835
Additional annual housing need (2012-37)	106	169
Annual housing need total (2012-37)	590	653

Source: EX/CYC/9 Tables 8 and 10; Hatch Regeneris calculations. The additional housing need is the level above the 484 dpa starting point.

- 3.92 The Council's evidence also applies the 2014-based HRR and the adjusted HRR to the jobs led figure. These adjustments result in 735 and 790 dpa. The latter is now the Council's preferred OAN. The table below shows how this works through to housing need for these scenarios.

Shortfall in future resident workforce	4,862	7,742
Additional housing need (2012-37)	2,775	4,418
Ratio of future resident workers: additional dwellings	1.75	1.75
Additional annual housing need (2012-37)	111	176
Annual housing need total (2012-37)	790	855

Source: EX/CYC/9 Tables 8 and 10; Hatch Regeneris calculations

- 3.93 The time periods used in the Council's evidence need further explanation than is given in the study. Calculations of the additional resident labour requirement are presented for a 20 year period (2017-37). However, the resulting housing need is presented for the 25 year period 2012-37. It is not made clear whether the implication of the Council's figures is that extra housing is needed from 2017 onwards. If so, then the relevant figures for both scenarios must be higher than 790 and 855 dpa if these are averages from 2012. The figures would be c. 810 and 890 dpa.
- 3.94 Two aspects of the Council's modelling need further comment. First, the apparent assumption that each extra dwelling generates 1.75 to 1.83 extra resident workers. This ratio looks high. The data on the number of economically active residents to households in York suggests a current ratio of around 1.3, and a ratio of 1.5 would be more typical.
- 3.95 Second, it is not clear that the calculation in EX/CYC/9 takes account of the proportion of economically active residents who would be unemployed at any given point in time. Whilst the study suggests (para. 3.6) that it assumes no change in unemployment, it does not show whether and how it allows for this in modelling the relationship between future jobs, labour force and housing. Annual Population Survey data show that unemployment is running at around 3% in York (model-based).
- 3.96 If these two adjustments were made (a ratio of 1.5 extra workers per household and 3% unemployment, the implied OANs would rise to 619-696 dpa in the SNPP 2016 scenario, and 814 to 891 dpa in the adjusted HRR scenario.
- 3.97 The 2017 SHMA Update (SD050) concluded that no adjustment to housing need for economic growth was required. This was on the basis of the labour force projections derived from the 2014-based household projections. The analysis we have carried out above suggests that the 2014-based starting point projection of 867 dpa is broadly consistent with the level of housing need linked to the higher of the jobs growth scenarios (806 a year), reinforcing the grounds for treating this figure as a starting point for OAN.

Market Signals

- 3.98 The Council has accepted that an upward adjustment to respond to adverse market signals evidence should be incorporated into York's OAN. The conclusion in EX/CYC/9 is that the appropriate market signals uplift is 15% (para. 4.34). This is applied to the starting point figure of 484 dpa, giving an adjusted OAN of 557 dpa.
- 3.99 The study then compares 557 dpa to the OANs implied by the adjusted demographic projections (629 and 679 dpa), and by the OAN necessary to support future employment growth (790 dpa). It concludes that the OAN should remain at 790 dpa, and that this would achieve both improvements to household formation and meet economic growth.
- 3.100 This conclusion relies on the 790 dpa figure delivering the uplift in housing supply relative to future need that is at the core of the PPG's approach on market signals. However, 790 dpa incorporates adjustments to household formation rates in younger age groups only, is not an adjustment to total future housing need as the PPG requires.

- 3.101 The HRR adjustments made in EX/CYC/9 return household formation in the 25-44 age cohort to a projected trajectory linked to the 2008-based household projections and trends up to that period. The long-run rise in house prices nationally started and accelerated from the mid-1990s. The assumption that household formation returns partly towards this earlier trend only implies that future rates for younger age groups move towards a level evident when house prices were already rising. It cannot represent an adjustment to total future housing supply relative to total need.
- 3.102 In this regard, a 15% adjustment to 790 dpa should be applied, which would result in an OAN of 908 dpa.

Appropriateness of 15% Adjustment

- 3.103 The Council's position on the appropriate adjustment has changed significantly over the sequence of SHMAs it has produced:
- In the June 2016 SHMA (SD051) it concluded that the appropriate uplift would be a negligible 8 dpa or just a 1% uplift on the starting point projections. The OAN was 841 dpa.
 - In the 2016 Addendum (SD052) the conclusions retained the recommended OAN of 841 dpa.
 - In the 2017 Addendum (SD050), a 10% market signals adjustment was concluded as appropriate. Applied to a base projection of 867 dpa, this gave an OAN of 953 dpa.
 - In SD050 the Council subsequently added an insert into the version published in September 2017 which explicitly rejected any market signals adjustment. It argued that the adjustment was speculative and arbitrary, relied too much on short term unrepresentative trends, and attached little or no weight to York's special character and setting, as well as to environmental considerations. It reverted to a preferred OAN of 867 dpa which was taken into the publication version of the Local Plan.
- 3.104 In SD050, the implication is that the Council's has applied policy considerations about what need can be met in determining its OAN. This is contrary to case law that has established that the full OAN should be established first before policy is applied in setting a Local Plan figure (Solihull MBC v Gallagher and Lioncourt, December 2014).
- 3.105 However, notwithstanding this issue, the Council's view that a market signals uplift was speculative and arbitrary flies in the face of the evidence for York. EX/CYC/9 has rightly concluded that a market signals uplift is necessary, but the scale of uplift and how it has been applied need further consideration in light of the most recent affordability evidence.
- 3.106 Median house prices paid in York stood at £237,500 in the year to December 2018. This ranked York behind only Harrogate, Yorkshire's most expensive local authority area, when compared with surrounding local authority areas. Over the long run, York has seen its median house price rise at rates on par with the England average, but at higher rates than all the surrounding areas and the region.

Table 3.12 Median Price Paid, Year to Dec 2018 and Change

	Median Price Paid (Year to Dec 2018) (£)	% Change 1995-2018	% Change 2008-18	% Change 2013-18
York	237,500	325%	38%	30%
East Riding	179,000	248%	22%	25%
Hambleton	228,500	260%	14%	14%
Harrogate	271,000	331%	29%	24%
Ryedale	225,000	284%	20%	22%
Selby	205,000	287%	31%	28%
Yorkshire and Humber	160,000	252%	23%	19%
England	240,000	336%	38%	28%

Source: Office for National Statistics, UK Land Registry

- 3.107 A similar pattern is evident for lower quartile house prices paid, which in theory represents the more affordable part of the market for house buyers. The average in York is significantly higher than all comparators with the exception of Harrogate. It has seen prices rise at faster rates than most areas.

Table 3.13 Lower Quartile House Price Paid, Year to Dec 2018 and Change

	Lower Quartile Price Paid (Year to Dec 2018) (£)	% Change 1995-2018	% Change 2008-18	% Change 2013-18
York	185,000	311%	31%	25%
East Riding	132,500	233%	15%	21%
Hambleton	170,500	244%	14%	14%
Harrogate	202,000	321%	30%	27%
Ryedale	170,000	270%	18%	21%
Selby	155,000	278%	29%	24%
Yorkshire and Humber	115,000	238%	18%	21%
England	153,000	287%	25%	22%

Source: Office for National Statistics, UK Land Registry

- 3.108 Affordability ratios are the key market signal in the new standard methodology for housing need assessment. On the median measure, York ranks below Harrogate, Ryedale and Hambleton, but has seen its ratio worsen at far faster rates than the comparators. This is a marker that affordability for people with a direct connection to York's employment base is significantly worsening. This is a clear indicator that supply is failing to keep pace with demand.

Table 3.14 Median Affordability (Workplace Earnings) Ratios and Change, Year to Sep 2018

	Lower Quartile Price Paid (Year to Dec 2018) (£)	% Change 1995-2018	% Change 2008-18	% Change 2013-18
York	8.86	139%	24%	36%
East Riding	6.64	100%	6%	18%
Hambleton	9.09	87%	4%	3%
Harrogate	10.13	127%	4%	18%
Ryedale	9.32	93%	-5%	8%
Selby	6.64	92%	11%	12%
Yorkshire and Humber	5.95	91%	4%	12%
England	7.83	121%	13%	16%

Source: Office for National Statistics, UK Land Registry

- 3.109 On the lower quartile measure, the ratio in York is much closer to that of Harrogate, and is higher than all comparator areas. It is significantly higher than that of England and the region. It has also seen the ratio worsen at a faster rate than all the comparators.

Table 3.15 Lower Quartile Affordability Ratios (Workplace Earnings) and Change to Sep 2018

	Lower Quartile Price Paid (Year to Dec 2018) (£)	% Change 1995-2018	% Change 2008-18	% Change 2013-18
York	9.41	134%	11%	20%
East Riding	6.61	85%	-10%	10%
Hambleton	9.36	90%	3%	6%
Harrogate	9.64	115%	-1%	16%
Ryedale	8.48	61%	-13%	4%
Selby	7.44	99%	9%	11%
Yorkshire and Humber	5.80	87%	-2%	11%
England	7.29	104%	5%	11%

Source: Office for National Statistics

- 3.110 The lower quartile affordability ratio cited in EX/CYC/9 (Table 12) is 7.26. The latest Government data suggests it is much higher (9.41). It appears that EX/CYC/9 may have actually cited the value for England in 2017 as York's LQ affordability ratio. Its observation (para. 4.18) that York has 'relatively better' affordability that has grown 'less than in England' is not supported by the data.
- 3.111 These indicators alone are sufficient to justify a market signals uplift. Given that there is strong evidence that affordability in York is worsening faster than local, regional and national comparators, the adjustment should be a substantial one.
- 3.112 However, EX/CYC/9 points to the worsening affordability of rental prices in York (Table 110, showing that they median and lower quartile rents are both higher than those of the

region and England, and that they have been worsening faster in recent years. This is the tenure type which has seen the fastest growth in recent years amongst younger age groups in particular as affordability locks them out of home ownership.

- 3.113 The data show both that York has the highest prices of all the comparator areas, and that the rates of increases have been much faster. Averages substantially exceed the regional and national averages.

	LQ Rent (£)	Change 2014-19	Median Rent (£)	Change 2014-19
York	675	23%	795	22%
East Riding	425	6%	485	2%
Hambleton	525	6%	585	6%
Harrogate	600	4%	725	7%
Ryedale	500	6%	575	10%
Selby	495	4%	550	5%
Yorkshire and Humber	450	13%	535	8%
England	525	11%	695	17%

Source: Valuation Office Agency, 2019

- 3.114 Given the comparative position of York on key affordability indicators and the evidence that affordability is worsening at a significantly faster rate than other locations, the key issue is whether a 15% upward adjustment is adequate. The PPG specifies (para. 020 Reference ID: 2a-020-20140306) that upward adjustments should be set at levels that are reasonable. However, the same paragraph also specifies that:

The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (eg the differential between land prices), the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be.

- 3.115 In settling on 15%, EX/CYC/9 lists a series of Inspector's conclusions on adjustments elsewhere. The three areas it cites as the most recent examples (Waverley, Mid-Sussex and Canterbury) where adjustments ranged from 20-25% are located in south east England, a high priced region in which two of those local authority areas are amongst the least affordable local authority areas outside Greater London. As comparators, they are therefore of limited value.
- 3.116 We note also that the rate at which York's median affordability ratio has worsened since 2013 (36%) is higher than that of all of the three areas and the rate of worsening on the lower quartile indicator is on par with that of Canterbury (20%) and close to that of Waverley and Mid Sussex (24% and 22% respectively).
- 3.117 On these grounds, an upward adjustment of at least 20% could be considered reasonable for a city that is one of the least affordable areas in its region, and where affordability trends are significantly worsening.
- 3.118 However, the affordability response set out in the new standard methodology for OAN in the updated PPG (2018) and a body of evidence about the scale of increases in the housing supply relative to demand point to the need for a more substantial uplift.
- 3.119 Application of the new method to the affordability data for York would result in an uplift of just over 30%. This is derived from:
- The median house price to workplace-based earnings ratio of 8.86.

- An adjustment to household growth in which for every 1% higher than 4.0 (assumed to represent an affordable ratio) the median affordability ratio is for the area, the increase is 0.25%.
 - For York, the median affordability ratio is 4.86 higher than 4.0, or 122%. The adjustment is therefore 30%.
- 3.120 An upward adjustment of this order is consistent with a range of authoritative studies and evidence, some of which have directly informed Government policy and the new PPG.
- The 2016 House of Lords Select Committee on Economic Affairs whose inquiry into the UK housing market concluded that at least 300,000 additional homes would be required annually to tackle the affordability crisis. Evidence provided to the inquiry by the UK Treasury included modelling showing that 250-300,000 homes would be necessary to maintain constant house price to earnings ratios, but the Select Committee's report noted (footnote 91) that this was considered to be an insufficient level of housing growth to achieve this.⁸ That level of housing growth would represent c. 40% more than the level implied by current household projections.
 - The 2016 Redfern Review was underpinned by evidence that implied a c. 44% uplift on the household projections would be necessary to keep house price inflation in check.
 - The 2016 Local Plans Expert Group (LPEG) concluded in its recommended approach to housing need assessment that affordability ratios in excess of 8.7 should require an uplift of 25% to housing need figures based on household projections.
 - The 2004 Barker Review concluded that the delivery of an additional 120,000 private sector dwellings a year would be necessary to reduce real price rises to 1.1% per annum, the then average across the EU. Against private sector gross starts of 140,000 in 2002/3, this represented an 85.7% uplift. A total of 260,000 dwellings a year would represent an uplift of around 21%
- 3.121 The outcome of applying the new standard OAN method to York is a figure of 1,078 dpa, based on average 10 year annual household growth of 827 to which the 30% upward adjustment is applied. The standard method does not allow for the application of a vacancy rate. A 3% vacancy and second homes rate adjustment would take the OAN to 1,110 dpa.
- 3.122 In EX/CYC/9, the 15% adjustment is applied only to the starting point projection of 484 dpa, giving a housing need figure of 557 dpa. A 30% uplift would take the figure to only 629 dpa, still short of the Council's preferred OAN of 790 dpa.

Affordable Housing Need

- 3.123 York's affordable housing need is substantial. At 573 per annum (EX/CYC/9, para. 4.20), it far exceeds the starting point figure assumed by the Council, and represents 72% of the preferred OAN of 790 dpa.
- 3.124 The study argues that a 'modest uplift' to the demographic-based need figure may be justified to address affordable housing need. Given the scale of affordable need, the conclusion that only a modest uplift is appropriate is questionable.

⁸ House of Lords Select Committee on Economic Affairs, Select Committee on Economic Affairs 1st Report of Session 2016–17 HL Paper 20, Building More Homes

- 3.125 EX/CYC/9 further cites case law (paras. 4.22-4.28) on the relationship between affordable housing need and the OAN to justify the position that it is not necessary to seek to meet affordable need in full through the OAN and related housing requirement.
- 3.126 Policy H10 (Affordable Housing) in the publication draft Local Plan does not specify the level of affordable housing that the Plan sets out to achieve. Thresholds for affordable delivery on housing sites are set at an upper limit of 30% (greenfield sites), at 20% for brownfield sites, and at percentages ranging from 2% to 20% for smaller sites). At best, delivery at 30% against an OAN of 790 dpa would imply the delivery of only 237 affordable dwellings a year, half the assessed need. In practice, the percentage of affordable units on sites that come forward during the Plan period is likely to be much lower than this, given the thresholds set in Policy H10.
- 3.127 This further points to the need for the Council to accept the higher OAN figures implied by its evidence. Higher levels of planned housing delivery could enable the city to deliver much more of its assessed affordable need.

4. Conclusions: York's OAN

Council's OAN Evidence

- 4.1 The City of York Council is now proposing a significant reduction in its preferred OAN as the Publication Draft Local Plan enters examination. The figure of 790 dpa is a 9% reduction on the OAN of 867 dpa presented in the Publication Draft. That higher figure was itself the outcome of a policy on decision by the Council not to accept the full OAN of 953 dpa recommended in its evidence base. It is the latest in a long sequence of changes to the Council's evidence and the OAN figures it has accepted, and 790 dpa is a low end of the wide range that has emerged from this work.
- 4.2 There is no indication in the Publication Draft Local Plan that the proposed reduction in the OAN has been discussed as part of the duty to cooperate process with neighbouring authorities, including Selby which is part of York's housing market area. A lower housing growth target for York has implications for housing markets and for cross-boundary flows of commuters elsewhere in the area, and how these have been addressed through the DTC should be considered at the Examination.
- 4.3 The proposed OAN of 790 dpa is the outcome of a 2019 OAN update (EX/CYC/9) which in several respects provides flawed justification for this to be the appropriate number:
- It concludes that 2016-based population and household projections are the appropriate starting point and base projections. The study relies on very short term trends in its explanation for preferring these projections to the earlier 2014-based projections or for other demographic projections. The evidence does not show that the 2016-based projection are the most robust basis for assumptions about future housing need in York.
 - The UK Government has cautioned against using the 2016-based household projections in new Planning Practice Guidance issued in 2018 and 2019. Whilst York's Local Plan will be tested against the earlier, 2014 PPG and 2012 NPPF, this provides further grounds for caution about the 2016-based projections.
 - The Council has opted for an OAN based on jobs growth of 650 per annum, 2017-37. However, its own Employment Land Review makes it clear that proposed employment land requirements should enable the city to deliver jobs growth of 806 per annum. This higher figure is described as being no less accurate a view of future jobs than 650 per annum, and it should provide the basis for aligning future jobs and housing.
 - The conclusion of EX/CYC/9 is that 650 jobs a year generates a housing need of 790 dpa, based on applying an adjusted set of household representative rates to the population projections. The modelling allows for additional net migration to York to meet a significant shortfall in resident workers implied by the 2016-based projections. However, this may understate the housing need to support 650 jobs per annum, which our analysis suggests should be 814 dpa.
 - For the higher jobs growth figure of 806 per annum, the resident labour shortfall is larger, and this implies housing need figures of 855-891 dpa.
 - The Council's evidence rightly accepts that an uplift within the OAN to account for adverse market signals evidence is justified. However, the proposed 15% uplift does not reflect the comparative position of York on a range of key affordability

indicators, for which the most recent data show it is one of the two least affordable local authority areas in Yorkshire and the Humber, has affordability that is significantly worse than the regional and national averages, and has seen a worsening of affordability at faster rates than all of the comparators we consider in this report.

- Furthermore, the market signals adjustment of 15% is not applied to the Council's preferred OAN figure of 790 dpa. Whilst that figure includes some adjustments to allow for improvements to household formation rates in younger age groups compared with the 2016-based projections, this only partly addresses affordability issues. Applying the 15% adjustment to that figure would give an OAN of 908 dpa.
- A higher market signals adjustment is justified. On the basis of the Council's own analysis, the minimum should be 20%. However, the figure of 30% implied by the new standard methodology would be consistent with the weight of evidence that now shows that much higher increases in housing supply relative to demand are essential if England's severe affordability problems are to be addressed.
- The Council's evidence concludes that only a modest uplift within the OAN and planned housing requirements is necessary to increase affordable housing delivery. This understates the scale of affordable need (573 pa) in York, and at a maximum of 30% delivery on future housing sites, would contribute to the delivery of only half this need at 790 dpa. Higher OAN figures would increase the potential for York to meet more of this need.

4.4 In conclusion, the new evidence the Council has presented for Examination does not provide a sound basis for identifying the city's full OAN.

What is York's OAN?

4.5 There are reasonable grounds to conclude that the 2014-based projections should continue to provide the starting point for determining York's OAN. This implies that the starting point figure should be 867 dpa.

4.6 Applying an appropriate market signals uplift to this figure of at least 20% would yield an OAN of 1,040 dpa. At 30%, the relevant figure would be 1,136 dpa. These figures are broadly consistent with the 1,078 that arises from the application of the new standard method set out in the 2018/19 Planning Practice Guidance.

4.7 Our analysis of the economic growth evidence concludes that York should be planning for jobs growth of 806 dpa. On the basis of the Council's own analysis using the 2016-based projections, this would imply an economic growth led housing need of 855 dpa, which rises to 891 dpa with adjusted assumptions about unemployment and the labour force: households ratio.

4.8 These figures only partly account for affordability pressures. A market signals uplift of at least 20% would imply OANs of 1,026 to 1,069 dpa. Again, these figures are consistent with those that arise from the use of the 2014-based projections.

4.9 Our conclusion is therefore that the minimum OAN for York should be 1,026 dpa, a level of housing growth that would support future employment growth and has the potential to deliver significantly higher levels of affordable housing.



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From: Gen Kenington [REDACTED]
Sent: 22 July 2019 16:10
To: localplan@york.gov.uk
Subject: City of York Local Plan Proposed Modifications Consultation Response - Land West of ST8 Monks Cross
Attachments: York Local Plan Proposed Modifications Response July 2019 - Land West of ST8 Monks Cross.pdf; Local_Plan_Proposed_Modifications_Consultation_Response_Form_2019 - Land west of Monks Cross.pdf
Follow Up Flag: Follow up
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This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir or Madam,

Please find attached a completed consultation form and formal response to the Local Plan Proposed Modifications.

The response has been made on behalf of landowners of land to the immediate west of Strategic Site ST8.

Please could you acknowledge receipt of the attachments.

Kind regards

Gen Kenington

MTP MRTPI
Associate Director

Johnson Mowat

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City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Mark
Last Name		Johnson
Organisation (where relevant)	Michael Glover LLP	Johnson Mowat Planning Limited
Representing (if applicable)	Curry, Hudson and GM Ward Trust	
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Postcode		LS1 2TW
E-mail Address		████████████████████
Telephone Number		██████████

Representations must be received by Monday 22 July 2019, up until midnight.

Representations received after this time will not be considered duly made.

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM4 and all subsequent PM's relating to the housing requirement reduction.

Document:

- G L Hearn Housing Needs update
- Sustainability Appraisal Report Addendum

Page Number:

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

See attached Statement

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

See attached Statement.

Increase the housing requirement in Policy SS1 to a minimum of 1,070 dwellings per annum in line with the Standard Method Local Housing Need calculation.

Identify additional housing sites.

Amend the housing trajectory to annualize the undersupply of 512 dwellings over the first 5 years of the plan rather than over the Plan Period.

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

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7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To have the opportunity to engage in the debate particularly relating to the housing requirement and housing supply, and present the case in support of land immediately west of Monks Cross.

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

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Signature

Date

22nd July 2019



JohnsonMowat
Planning & Development Consultants



**CITY OF YORK LOCAL PLAN
PROPOSED MODIFICATIONS JUNE 2019**

**LAND IMMEDIATELY WEST OF SITE ST8 MONKS CROSS
On behalf of the landowners of land immediately west of ST8.**

July 2019



1.0 Introduction

- 1.1 This representation should be read alongside previous consultation responses submitted to the Publication Draft Local Plan in March 2018 on behalf of landowners to the immediate south of North Lane, to the east of the existing Huntington urban edge, and to the immediate west of the western boundary of proposed strategic site ST8.

- 1.2 On behalf of the landowners, we maintain our objection to the removal of land (identified in orange on the cover of this statement) from strategic site ST8 and maintain that the proposed resultant identification of land immediately west of Site ST8 as Green Belt is inappropriate, as it would serve no Green Belt function.



2.0 Housing Requirement

2.1 There are a number of Proposed Modifications which all relate to the Council's decision to reduce the housing requirement, which forms the basis of this consultation exercise. Our comments relating to the housing requirement are therefore relevant to the following Proposed Modifications:

PM3, PM4, PM5, PM20a – PM20d, PM21a – PM21d, PM22, PM44.

2.2 We object to the Council's further reduction to the housing requirement at this late stage, following the submission of the Local Plan. Previous comments submitted to the Publication Draft Local Plan objected to the Council's choice to opt for the lowest possible housing requirement, contrary to advice in the SHMA update at the time.

2.3 The Council's proposed modifications attempt to justify the reduction in the housing requirement from 867 dwellings in the Publication Draft to 790 dwellings based on the updated Housing Needs Update evidence published by G L Hearn in January 2019. It is considered the proposed modifications to reduce the housing requirement are unsound as they fail the 'positively prepared', 'justified', and 'consistent with National Policy' soundness tests. We have significant concerns with the evidence update, which uses the 2016-based population projections, despite Government guidance requiring the continued use of the 2014-based projections, for reasons outlined below.

2.4 The ONS published 2016-based Sub-National Population Projections (SNPP) and Sub-National Household Projections (SNHP) have been used as the starting point by G L Hearn to generate a number of new potential housing need scenarios. We note and support the detailed HBF (July 2019) comments relating to the reasons behind the differences between the 2014-based and 2016-based SNPP and SNHP, and do not repeat them here.

2.5 The concerns with the 2016-based projections have been well documented, with the resultant reduction in the level of household growth across the Country causing concerns in how the Government will fulfil its aspiration to increase housing delivery to 300,000 dwellings per annum by the mid 2020's. The Government have been clear that for the purposes of calculating housing needs assessment under the new guidance in relation to the Standard Method, that



the 2016-based projections are **not** to be used. This is now reflected in revisions to PPG, which at Paragraph 005 ID2a-005-20190220 state:

“the 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes.”

2.6 PPG goes on to state at Paragraph 015 Id 2a-015-20190220 that:

“Any method which relies on using the 2016-based household projections will not be considered to be following the standard method... it is not considered that these projections provide an appropriate basis for use in the standard method.”

2.7 The revisions to PPG follow on from the Governments February 2019 response to the technical consultation on updates to NPPF and NPPG which stated:

“The changes to underlying assumptions in the population projections and methodological improvements to the household projections had led to significant variations in housing need at a local level, something that needs addressing in the short term... the Government continues to think that the 2016-based household projections should not be used as a reason to justify lower housing need. We understand respondents’ concerns about not using the latest evidence, but for reasons set out in the consultation document we consider the consultation proposals to be the most appropriate approach in the short-term. We are specifying in planning guidance that using the 2016-based household projections will not be considered to be an exceptional circumstance that justifies identifying minimum need levels lower than those identified by the standard method.”

2.8 We are aware that the Government guidance for the continued use of the 2014-based projections relates to the calculating using the standard method in the updated NPPF, which differs from the City of York Local Plan, which has been submitted and is being examined under the transitional arrangements and against the 2012 NPPF. The housing requirement in the York Local Plan has therefore been calculated using the Objectively Assessed Needs identified through a SHMA. That said, it would logically apply that the Government’s concern with the



2016-based projections would also apply to Authorities calculating housing need under the transitional arrangements and OAN calculations.

- 2.9 The City of York is the only authority in the Yorkshire region whereby housing need calculated using the standard method results in an increased housing need compared with the current local assessment. The first Standard Method published on 14th September 2017 resulted in an indicative annual requirement of 1,070 dwellings for the City of York which was more in line with the latest G L Hearn 2017 SHMA Update at the time of 953 dwellings per annum.
- 2.10 Calculating the Local Housing Need figure using the 2014-based household projections from the current year over a ten year period (2019 – 2029) and adjusting using the latest affordability ratio (published in March 2019), results in a requirement of **1,069** dwellings per annum. This remains the same as the original standard methodology figure of 1,070 dwellings per annum, and remains considerably higher than the Council's reduced figure of 790 dwellings per annum. It is clear from the latest Local Housing Need calculation that the direction of travel remains above 1,000 dwellings per annum, yet the Council are seeking to reduce the requirement.
- 2.11 The implications of fixing a housing requirement via the Local Plan that is lower than justified has significant implications for York, and will lead to the worsening of an already severe affordability situation. It is likely that the affordability ratio in York will continue to rise, particularly if there is pent up demand as a result of a restricted housing requirement. Based on the direction of travel, it is likely that the housing requirement will be increased in future reviews, therefore continuing to restrict the housing requirement now will make it increasingly difficult to deliver a potentially significant increase in housing requirement via future reviews.
- 2.12 We disagree with the Council's interpretation of the use of the 2016 based projections as stated in the Sustainability Appraisal Addendum (SAA). In justifying the reasons for selecting the 790 dpa figure and rejecting the alternatives, the SAA references the ONS SNPP 2016 based projections and references a 'marked discrepancy with the previous 2014 based figures' (SAA paragraph 5.3.40), which has had a significant bearing on the lower OAN in the GL Hearn Update of 790 dpa. There is however no reference to the Government's technical update or NPPG which proposes in the short term the continued use of the 2014 based data for calculating housing need via the standard method.
- 2.13 The SAA importantly states at paragraph 5.3.26 that:



“Given the significant positive effects identified for the 2017 SHMA recommended alternative figure [953 dpa] against the SA objectives for housing, employment and equality of access (with a similar performance for the remaining objectives to the proposed preferred housing figure of 790 dpa and Publication Draft figure of 867 dpa), **the 2017 SHMA Update figure is considered to perform marginally better in sustainability terms than the proposed figure.**” (our emphasis).

- 2.14 Clearly, the Council are willing to delay the progress of the Local Plan by consulting on Proposed Modifications to the submitted Publication Draft Local Plan which reduces the housing requirement. Arguably, it is considered that this delay allows the opportunity to re-visit the evidence in light of the updated NPPF and NPPG and look to amend the housing requirement and increase the requirement based on the latest calculation of Local Housing Need.
- 2.15 We are aware that Lichfields have updated their housing need modelling work as a result of the Council’s Proposed Modifications. Their July 2019 findings conclude that there are fundamental flaws in the Council’s updated housing need assessment of 790 dwellings per annum. The Lichfields calculation, which adjusts the demographic baseline allowing for long term trends to international migration levels; applies a 20% market signals adjustment and a 10% affordable housing uplift results in a figure of **1,215** dwellings per annum.
- 2.16 Lichfields identify a further 84 dwellings per annum as required to meet the Universities’ student growth needs, which results in a rounded OAHN of **1,300** dwellings per annum. This is considerably higher than the Council’s updated requirement of 790 dwellings per annum and 22% higher than the Standard Methodology figure of 1,069 dwellings per annum.
- 2.17 It is recommended that the student housing requirement in York is considered in isolation, and therefore removed from both the identified supply and the overall requirement and regarded as a separate policy requirement. Currently, the City are over-relying on student housing to meet their overall housing need.



Recommendation:

In order to make the Local Plan sound, it is recommended that the Housing Requirement in Policy SS1 is increased to a minimum of 1,070 in line with the Standard Method Local Housing Need calculation.

It is recommended that additional sites are identified in the Local Plan, including land immediately west of Strategic Site ST8.

Should the Council continue to progress the Local Plan under the transitional arrangements and seek a lower housing requirement it is recommended that upon Adoption, a review of the Local Plan is immediately triggered to ensure the Local Plan is updated in line with the Standard Method and updated Framework.



3.0 SHLAA Figure 6 Update– Detailed Housing Trajectory

- 3.1 We object to the undersupply of 512 dwellings being annualised over the Plan Period. The shortfall should be annualised over first 5 years of the Plan. This affects the Associated Figures and Tables in the Proposed Modifications document (PM20 a – d and PM21 a – d).

From: Gen Kenington [REDACTED]
Sent: 22 July 2019 16:10
To: localplan@york.gov.uk
Subject: City of York Local Plan Proposed Modifications Consultation Response - ST8 Monks Cross
Attachments: York Local Plan Proposed Modifications Response July 2019 - ST8 Monks Cross.pdf; Local_Plan_Proposed_Modifications_Consultation_Response_Form_2019 Redrow Monks Cross.pdf
Follow Up Flag: Follow up
Flag Status: Completed
Categories: Red Category

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir or Madam,

Please find attached a completed consultation form and formal response to the Local Plan Proposed Modifications.

The response has been made on behalf of Redrow Homes, GM Ward Trust, Mr K Hudson, Mrs C Bowes and Mrs E Crocker in relation to their continued land interests at Strategic Site ST8, Monks Cross.

Please could you acknowledge receipt of the attachments.

Kind regards

Gen Kenington

MTP MRTPI
Associate Director

Johnson Mowat

Planning & Development Consultants

Coronet House, Queen Street, Leeds, LS1 2TW

W: www.johnsonmowat.co.uk

Please consider the environment before printing this email. This email and any files transmitted with it are confidential and may contain privileged information intended solely for the use of the addressee. If you are not the intended recipient you are hereby notified that any dissemination of this communication is strictly prohibited. If you are not the intended recipient, please advise the sender immediately by return email, or contact our office on 0113 887 0120 and delete this message from your system. As this message has been transmitted over a public network Johnson Mowat cannot guarantee its accuracy or completeness. If you suspect that the message may have been intercepted or amended, please contact the sender.

Johnson Mowat, Coronet House, Queen Street, Leeds, West Yorkshire LS1 2TW
Registered in England Nos: OC407525

City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Mark
Last Name		Johnson
Organisation (where relevant)	Redrow Homes, G M Ward Trust, K Hudson, C Bowes and E Crocker	Johnson Mowat Planning Limited
Representing (if applicable)		
Address – line 1		Coronet House
Address – line 2		Queen Street
Address – line 3		Leeds
Address – line 4		
Address – line 5		
Postcode		LS1 2TW
E-mail Address		████████████████████
Telephone Number		██████████

Representations must be received by Monday 22 July 2019, up until midnight.

Representations received after this time will not be considered duly made.

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM4 and all subsequent PM's relating to the housing requirement reduction.

Document:

- G L Hearn Housing Needs update
- Sustainability Appraisal Report Addendum

Page Number:

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

See attached Statement

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

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Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To have the opportunity to engage in the debate, particularly relating to the housing requirement and housing supply, and answer / address any questions relating to strategic Site ST8 Monks Cross.

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Signature

Date

22nd July 2019



JohnsonMowat
Planning & Development Consultants



**CITY OF YORK LOCAL PLAN
PROPOSED MODIFICATIONS JUNE 2019**

LAND AT MONKS CROSS (Ref ST8)

**On behalf of Redrow Homes, GM Ward Trust, Mr K Hudson, Mrs C
Bowes and Mrs E Crocker**

July 2019



1.0 Introduction

- 1.1 This representation should be read alongside previous consultation responses submitted to the Publication Draft Local Plan in March 2018 on behalf of Redrow Homes, G M Ward Trust, K Hudson, C Bowes and E Crocker, in relation to their continued land interest at Monks Cross (Site Ref ST8).
- 1.2 An Outline Planning Application for the development of circa 970 dwellings including infrastructure, open space, primary school, associated community facilities, convenience store and Country Park was submitted on behalf of Redrow Homes (Yorkshire) Limited in January 2018 on the emerging Local Plan ST8 site. The application is pending consideration (18/00017/OUTM).



2.0 Housing Requirement

2.1 There are a number of Proposed Modifications which all relate to the Council's decision to reduce the housing requirement, which forms the basis of this consultation exercise. Our comments relating to the housing requirement are therefore relevant to the following Proposed Modifications:

PM3, PM4, PM5, PM20a – PM20d, PM21a – PM21d, PM22, PM44.

2.2 We object to the Council's further reduction to the housing requirement at this late stage, following the submission of the Local Plan. Previous comments submitted to the Publication Draft Local Plan objected to the Council's choice to opt for the lowest possible housing requirement, contrary to advice in the SHMA update at the time.

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through a SHMA. That said, it would logically apply that the Government's concern with the 2016-based projections would also apply to Authorities calculating housing need under the transitional arrangements and OAN calculations.

- 2.9 The City of York is the only authority in the Yorkshire region whereby housing need calculated using the standard method results in an increased housing need compared with the current local assessment. The first Standard Method published on 14th September 2017 resulted in an indicative annual requirement of 1,070 dwellings for the City of York which was more in line with the latest G L Hearn 2017 SHMA Update at the time of 953 dwellings per annum.
- 2.10 Calculating the Local Housing Need figure using the 2014-based household projections from the current year over a ten year period (2019 – 2029) and adjusting using the latest affordability ratio (published in March 2019), results in a requirement of **1,069** dwellings per annum. This remains the same as the original standard methodology figure of 1,070 dwellings per annum, and remains considerably higher than the Council's reduced figure of 790 dwellings per annum. It is clear from the latest Local Housing Need calculation that the direction of travel remains above 1,000 dwellings per annum, yet the Council are seeking to reduce the requirement.
- 2.11 The implications of fixing a housing requirement via the Local Plan that is lower than justified has significant implications for York, and will lead to the worsening of an already severe affordability situation. It is likely that the affordability ratio in York will continue to rise, particularly if there is pent up demand as a result of a restricted housing requirement. Based on the direction of travel, it is likely that the housing requirement will be increased in future reviews, therefore continuing to restrict the housing requirement now will make it increasingly difficult to deliver a potentially significant increase in housing requirement via future reviews.
- 2.12 We disagree with the Council's interpretation of the use of the 2016 based projections as stated in the Sustainability Appraisal Addendum (SAA). In justifying the reasons for selecting the 790 dpa figure and rejecting the alternatives, the SAA references the ONS SNPP 2016 based projections and references a 'marked discrepancy with the previous 2014 based figures' (SAA paragraph 5.3.40), which has had a significant bearing on the lower OAN in the GL Hearn Update of 790 dpa. There is however no reference to the Government's technical update or NPPG which proposes in the short term the continued use of the 2014 based data for calculating housing need via the standard method.



2.13 The SAA importantly states at paragraph 5.3.26 that:

“Given the significant positive effects identified for the 2017 SHMA recommended alternative figure [953 dpa] against the SA objectives for housing, employment and equality of access (with a similar performance for the remaining objectives to the proposed preferred housing figure of 790 dpa and Publication Draft figure of 867 dpa), **the 2017 SHMA Update figure is considered to perform marginally better in sustainability terms than the proposed figure.**” (our emphasis).

2.14 Clearly, the Council are willing to delay the progress of the Local Plan by consulting on Proposed Modifications to the submitted Publication Draft Local Plan which reduces the housing requirement. Arguably, it is considered that this delay allows the opportunity to re-visit the evidence in light of the updated NPPF and NPPG and look to amend the housing requirement and increase the requirement based on the latest calculation of Local Housing Need.

2.15 We are aware that Lichfields have updated their housing need modelling work as a result of the Council’s Proposed Modifications. Their July 2019 findings conclude that there are fundamental flaws in the Council’s updated housing need assessment of 790 dwellings per annum. The Lichfields calculation, which adjusts the demographic baseline allowing for long term trends to international migration levels; applies a 20% market signals adjustment and a 10% affordable housing uplift results in a figure of **1,215** dwellings per annum.

2.16 Lichfields identify a further 84 dwellings per annum as required to meet the Universities’ student growth needs, which results in a rounded OAHN of **1,300** dwellings per annum. This is considerably higher than the Council’s updated requirement of 790 dwellings per annum and 22% higher than the Standard Methodology figure of 1,069 dwellings per annum.

2.17 It is recommended that the student housing requirement in York is considered in isolation, and therefore removed from both the identified supply and the overall requirement and regarded as a separate policy requirement. Currently, the City are over-relying on student housing to meet their overall housing need.



Recommendation:

In order to make the Local Plan sound, it is recommended that the Housing Requirement in Policy SS1 is increased to a minimum of 1,070 in line with the Standard Method Local Housing Need calculation.

Should the Council continue to progress the Local Plan under the transitional arrangements and seek a lower housing requirement it is recommended that upon Adoption, a review of the Local Plan is immediately triggered to ensure the Local Plan is updated in line with the Standard Method and updated Framework.



3.0 PM6 – Policy SS10 Land North of Monks Cross

- 3.1 The modification removes reference to ST35 (Queen Elizabeth Barracks site) from the policy wording criteria X in relation to the consideration of cumulative impact on highways. We have no objection to this proposed modification.



4.0 SHLAA Figure 6 Update– Detailed Housing Trajectory

4.1 It is noted that Site ST8 – Monks Cross includes an anticipated delivery of 35 dwellings in 2019/20, increasing to 70 dwellings per annum between 2020/21 and 2022/23, and then 105 dwellings per annum from 2023/24 onwards. Given the delays in the Local Plan, and the reliance of the Local Plan adoption before an approval on ST8 it is highly unrealistic to expect delivery of 35 dwellings this year, and more likely that completions will start delivering on site from 2021 onwards.

4.2 We object to the undersupply of 512 dwellings being annualised over the Plan Period. The shortfall should be annualised over first 5 years of the Plan. This affects the Associated Figures and Tables in the Proposed Modifications document (PM20 a – d and PM21 a – d).

From: Gen Kenington [REDACTED]
Sent: 22 July 2019 16:12
To: localplan@york.gov.uk
Subject: City of York Local Plan Proposed Modifications Consultation Response - Taylor Wimpey, ST7 Stockton Lane, York
Attachments: Local_Plan_Proposed_Modifications_Consultation_Response_Form_2019 Taylor Wimpey ST7.pdf; York Local Plan Proposed Modifications Response July 2019 - ST7 Stockton Lane - Taylor Wimpey.pdf
Follow Up Flag: Follow up
Flag Status: Completed

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir or Madam,

Please find attached a completed consultation form and formal response to the Local Plan Proposed Modifications.

The response has been made on behalf of Taylor Wimpey in relation to their continued land interests at Strategic Site ST7, Stockton Lane, York.

Please could you acknowledge receipt of the attachments.

Kind regards

Gen Kenington

MTP MRTPI
Associate Director

Johnson Mowat

Planning & Development Consultants

Coronet House, Queen Street, Leeds, LS1 2TW

W: www.johnsonmowat.co.uk

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Johnson Mowat, Coronet House, Queen Street, Leeds, West Yorkshire LS1 2TW
Registered in England Nos: OC407525

City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Mark
Last Name		Johnson
Organisation (where relevant)	Taylor Wimpey	Johnson Mowat Planning Limited
Representing (if applicable)		
Address – line 1	c/o Johnson Mowat	Coronet House
Address – line 2		Queen Street
Address – line 3		Leeds
Address – line 4		
Address – line 5		
Postcode		LS1 2TW
E-mail Address		████████████████████
Telephone Number		██████████

Representations must be received by Monday 22 July 2019, up until midnight.

Representations received after this time will not be considered duly made.

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM4 and all subsequent PM's relating to the housing requirement reduction.

Document:

- G L Hearn Housing Needs update
- Sustainability Appraisal Report Addendum

Page Number:

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

See attached Statement

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

See attached Statement.

Increase the housing requirement in Policy SS1 to a minimum of 1,070 dwellings per annum in line with the Standard Method Local Housing Need calculation.

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To have the opportunity to engage in the debate particularly relating to the housing requirement and housing supply, and answer / address any questions relating to Strategic Site ST7 Stockton Lane, York.

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 2018 to inform the Local Plan process. We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't. City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

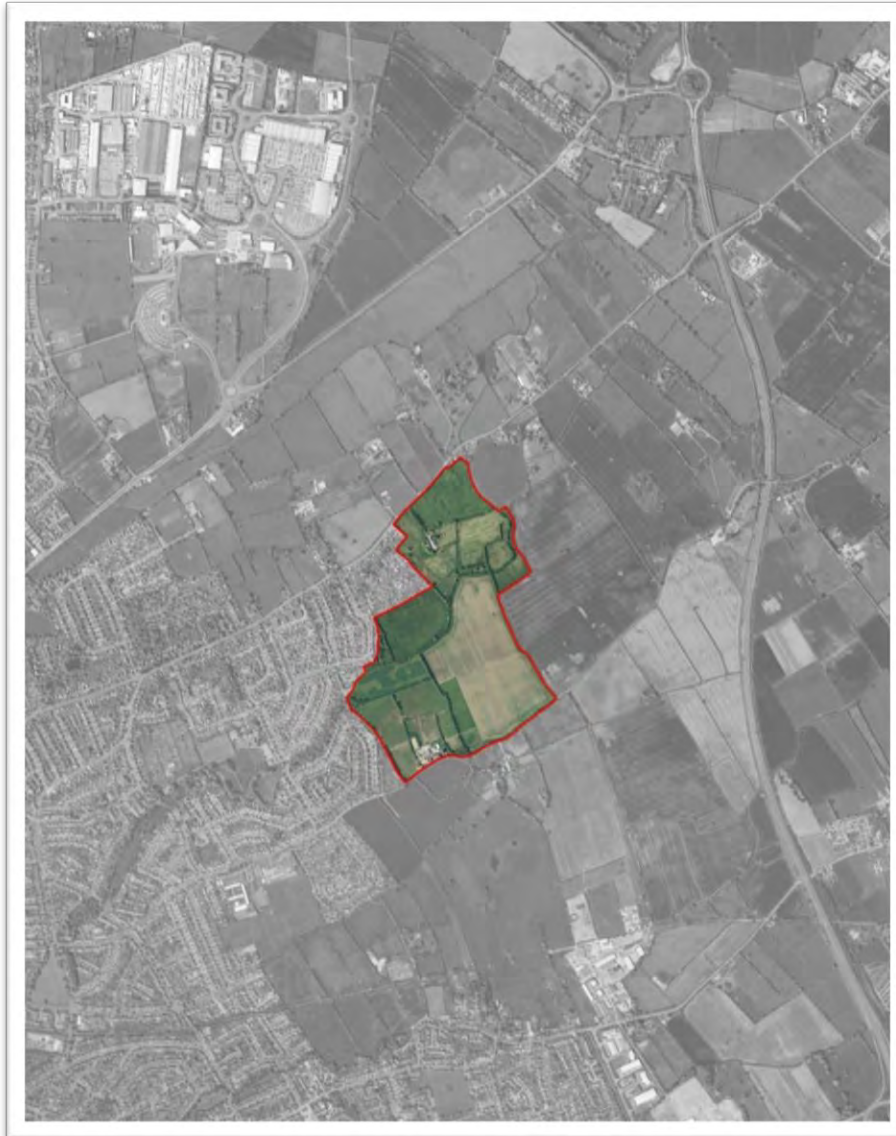
If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

Signature

Date



JohnsonMowat
Planning & Development Consultants



**CITY OF YORK LOCAL PLAN
PROPOSED MODIFICATIONS JUNE 2019**

Land South of Stockton Lane, York (SITE REF. ST7)

On behalf of Taylor Wimpey UK Ltd

July 2019



1.0 Introduction

- 1.1 This representation should be read alongside previous consultation responses submitted to the Publication Draft Local Plan in March 2018 on behalf of Taylor Wimpey in relation to their continued land interest at Stockton Lane, York (Site Ref ST7).
- 1.2 Whilst Taylor Wimpey maintain their support for the allocation of ST7 we maintain our objections to the proposed unnecessary separation of Site ST7 from the Main Urban Area, which we consider will make the development less rather than more sustainable.



2.0 Housing Requirement

2.1 There are a number of Proposed Modifications which all relate to the Council's decision to reduce the housing requirement, which forms the basis of this consultation exercise. Our comments relating to the housing requirement are therefore relevant to the following Proposed Modifications:

PM3, PM4, PM5, PM20a – PM20d, PM21a – PM21d, PM22, PM44.

2.2 We object to the Council's further reduction to the housing requirement at this late stage, following the submission of the Local Plan. Previous comments submitted to the Publication Draft Local Plan objected to the Council's choice to opt for the lowest possible housing requirement, contrary to advice in the SHMA update at the time.

2.3 The Council's proposed modifications attempt to justify the reduction in the housing requirement from 867 dwellings in the Publication Draft to 790 dwellings based on the updated Housing Needs Update evidence published by G L Hearn in January 2019. It is considered the proposed modifications to reduce the housing requirement are unsound as they fail the 'positively prepared', 'justified', and 'consistent with National Policy' soundness tests. We have significant concerns with the evidence update, which uses the 2016-based population projections, despite Government guidance requiring the continued use of the 2014-based projections, for reasons outlined below.

2.4 The ONS published 2016-based Sub-National Population Projections (SNPP) and Sub-National Household Projections (SNHP) have been used as the starting point by G L Hearn to generate a number of new potential housing need scenarios. We note and support the detailed HBF (July 2019) comments relating to the reasons behind the differences between the 2014-based and 2016-based SNPP and SNHP, and do not repeat them here.

2.5 The concerns with the 2016-based projections have been well documented, with the resultant reduction in the level of household growth across the Country causing concerns in how the Government will fulfil its aspiration to increase housing delivery to 300,000 dwellings per annum by the mid 2020's. The Government have been clear that for the purposes of calculating housing needs assessment under the new guidance in relation to the Standard Method, that the 2016-based projections are **not** to be used. This is now reflected in revisions to PPG, which at Paragraph 005 ID2a-005-20190220 state:



“the 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes.”

2.6 PPG goes on to state at Paragraph 015 Id 2a-015-20190220 that:

“Any method which relies on using the 2016-based household projections will not be considered to be following the standard method... it is not considered that these projections provide an appropriate basis for use in the standard method.”

2.7 The revisions to PPG follow on from the Governments February 2019 response to the technical consultation on updates to NPPF and NPPG which stated:

“The changes to underlying assumptions in the population projections and methodological improvements to the household projections had led to significant variations in housing need at a local level, something that needs addressing in the short term... the Government continues to think that the 2016-based household projections should not be used as a reason to justify lower housing need. We understand respondents’ concerns about not using the latest evidence, but for reasons set out in the consultation document we consider the consultation proposals to be the most appropriate approach in the short-term. We are specifying in planning guidance that using the 2016-based household projections will not be considered to be an exceptional circumstance that justifies identifying minimum need levels lower than those identified by the standard method.”

2.8 We are aware that the Government guidance for the continued use of the 2014-based projections relates to the calculating using the standard method in the updated NPPF, which differs from the City of York Local Plan, which has been submitted and is being examined under the transitional arrangements and against the 2012 NPPF. The housing requirement in the York Local Plan has therefore been calculated using the Objectively Assessed Needs identified through a SHMA. That said, it would logically apply that the Government’s concern with the 2016-based projections would also apply to Authorities calculating housing need under the transitional arrangements and OAN calculations.



- 2.9 The City of York is the only authority in the Yorkshire region whereby housing need calculated using the standard method results in an increased housing need compared with the current local assessment. The first Standard Method published on 14th September 2017 resulted in an indicative annual requirement of 1,070 dwellings for the City of York which was more in line with the latest G L Hearn 2017 SHMA Update at the time of 953 dwellings per annum.
- 2.10 Calculating the Local Housing Need figure using the 2014-based household projections from the current year over a ten year period (2019 – 2029) and adjusting using the latest affordability ratio (published in March 2019), results in a requirement of **1,069** dwellings per annum. This remains the same as the original standard methodology figure of 1,070 dwellings per annum, and remains considerably higher than the Council's reduced figure of 790 dwellings per annum. It is clear from the latest Local Housing Need calculation that the direction of travel remains above 1,000 dwellings per annum, yet the Council are seeking to reduce the requirement.
- 2.11 The implications of fixing a housing requirement via the Local Plan that is lower than justified has significant implications for York, and will lead to the worsening of an already severe affordability situation. It is likely that the affordability ratio in York will continue to rise, particularly if there is pent up demand as a result of a restricted housing requirement. Based on the direction of travel, it is likely that the housing requirement will be increased in future reviews, therefore continuing to restrict the housing requirement now will make it increasingly difficult to deliver a potentially significant increase in housing requirement via future reviews.
- 2.12 We disagree with the Council's interpretation of the use of the 2016 based projections as stated in the Sustainability Appraisal Addendum (SAA). In justifying the reasons for selecting the 790 dpa figure and rejecting the alternatives, the SAA references the ONS SNPP 2016 based projections and references a 'marked discrepancy with the previous 2014 based figures' (SAA paragraph 5.3.40), which has had a significant bearing on the lower OAN in the GL Hearn Update of 790 dpa. There is however no reference to the Government's technical update or NPPG which proposes in the short term the continued use of the 2014 based data for calculating housing need via the standard method.
- 2.13 The SAA importantly states at paragraph 5.3.26 that:

“Given the significant positive effects identified for the 2017 SHMA recommended alternative figure [953 dpa] against the SA objectives for housing, employment and equality of access (with a similar performance for the remaining objectives to the proposed preferred housing figure of 790 dpa and Publication Draft figure of 867 dpa),



the 2017 SHMA Update figure is considered to perform marginally better in sustainability terms than the proposed figure.” (our emphasis).

- 2.14 Clearly, the Council are willing to delay the progress of the Local Plan by consulting on Proposed Modifications to the submitted Publication Draft Local Plan which reduces the housing requirement. Arguably, it is considered that this delay allows the opportunity to re-visit the evidence in light of the updated NPPF and NPPG and look to amend the housing requirement and increase the requirement based on the latest calculation of Local Housing Need.
- 2.15 Taylor Wimpey are part of a consortium who have commissioned Lichfields to update their housing need modelling work as a result of the Council's Proposed Modifications. The Lichfields Representations to the Local Plan Proposed Modifications is included at Appendix 1. The Lichfields July 2019 findings conclude that there are fundamental flaws in the Council's updated housing need assessment of 790 dwellings per annum. The Lichfields calculation, which adjusts the demographic baseline allowing for long term trends to international migration levels; applies a 20% market signals adjustment and a 10% affordable housing uplift results in a figure of **1,215** dwellings per annum.
- 2.16 Lichfields identify a further 84 dwellings per annum as required to meet the Universities' student growth needs, which results in a rounded OAHN of **1,300** dwellings per annum. This is considerably higher than the Council's updated requirement of 790 dwellings per annum and 22% higher than the Standard Methodology figure of 1,069 dwellings per annum.
- 2.17 It is recommended that the student housing requirement in York is considered in isolation, and therefore removed from both the identified supply and the overall requirement and regarded as a separate policy requirement. Currently, the City are over-relying on student housing to meet their overall housing need.

Recommendation:

In order to make the Local Plan sound, it is recommended that the Housing Requirement in Policy SS1 is increased to a minimum of 1,070 in line with the Standard Method Local Housing Need calculation.

Should the Council continue to progress the Local Plan under the transitional arrangements and seek a lower housing requirement it is recommended that upon Adoption, a review of the Local



Plan is immediately triggered to ensure the Local Plan is updated in line with the Standard Method and updated Framework.



3.0 SHLAA Figure 6 Update– Detailed Housing Trajectory

- 3.1 Our comments to the Publication Draft Local Plan in relation to Site ST7 remain, in relation to the size of the strategic site and its separation from the urban edge.
- 3.2 It is noted that Site ST7 – Land east of Metcalfe Lane includes an anticipated delivery of 35 dwellings in 2020/21 and 2021/22, increasing to 70 dwellings per annum from 2022/23 onwards. Given the delays in the Local Plan; the reliance of the Local Plan adoption before any approval on ST7; and the fact that an application has yet to be submitted, it is highly unrealistic to expect delivery of dwellings next year.
- 3.3 We object to the undersupply of 512 dwellings being annualised over the Plan Period. The shortfall should be annualised over first 5 years of the Plan. This affects the Associated Figures and Tables in the Proposed Modifications document (PM20 a – d and PM21 a – d).



APPENDIX 1

City of York Local Plan

Proposed Modifications Version

Representations on Housing Matters

Taylor Wimpey; Wakeford Properties; Persimmon Homes; Bellway Homes

July 2019





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1.0 Introduction

- 1.1 This statement is prepared on behalf of four different and separate participants who have jointly instructed Lichfields to represent them on matters of housing need. The participants are Taylor Wimpey, Persimmon Homes, Wakeford Properties and Bellway Homes. Each has their own distinct interests in the City and have submitted separate responses on other matters, but present the following shared position on housing need.
- 1.2 The assessment of York’s housing need in this statement forms part of the above participant’s response to the York Local Plan [YLP] Proposed Modifications Version (June 2019) covering Local Housing Need, housing land supply and affordable housing. They are submitted to City of York Council [CYC] for consideration in the formulation of its new Local Plan for the City.
- 1.3 In particular, two main issues are analysed:
- 1 A review of CYC’s existing evidence on housing needs and establishing the scale of need and demand for market/affordable housing in the City; and,
 - 2 An appraisal of the housing trajectory and five-year land supply position which underpins CYC’s Plan.

City of York Council’s Local Plan Proposed Modifications (June 2019)

- 1.4 A review of the Objectively Assessed Housing Need [OAHN] was undertaken on behalf of CYC by GL Hearn in January 2019 (*The Housing Needs Update report*), which supersedes the previous SHMA Update (2017). This report advised that in light of the latest set of 2016-based Sub-National Household Projections [SNHP] in September 2018, York’s OAN has fallen from 867 dwellings per annum [dpa] to 790 dpa.
- 1.5 On the basis of this evidence, the Council considered that under the transitional arrangements of the 2012 NPPF and the requirements of the National Planning Practice Guidance [the Practice Guidance] in relation to the assessment of housing need, it was justified in making minor modifications to its submitted Plan as a result of the updated OAHN.
- 1.6 These modifications include an update to Figures 5.1 and 5.2 of the Plan – the housing trajectory and figure 6 of the Strategic Housing Land Availability Assessment (SHLAA) which provides the detailed housing trajectory. Policy SS1: *Delivering Sustainable Growth for York*, has been modified to state that the Council will “*deliver a minimum annual provision of 790 new dwellings over the plan period to 2032/33 and post plan period to 2037/38*”.
- 1.7 Furthermore, paragraph 3.3 of the accompanying explanation to Policy SS1 is now revised to state that:
- “Technical work has been carried out by GL Hearn in the Strategic Housing Market Assessment Update (2017). This work has updated the demographic baseline for York based on the July 2016 household projections to ~~867~~ 790 per annum. Following consideration of the outcomes of this work, the Council aims to meet an objectively assessed housing need of ~~867~~ 790 new dwellings per annum for the plan period to 2032/33, including any shortfall in housing provision against this need from the period 2012 to 2017, and for the post plan period to 2037/38.”*

- 1.8 Our review concludes that on the basis of the approach taken to reaching the 790 dpa housing requirement identified within the City of York Housing Needs Update (January 2019) (“the 2019 HNU”), and prior iterations of that study, that this housing requirement fails to meet the full OAHN, which is significantly higher than the Council has estimated.
- 1.9 Furthermore, we consider that the Plan would fail to make appropriate provision for sufficient housing to sustainably deliver, in a timely manner, housing in line with the City’s full OAHN, with further site allocations required within this Plan in order to ensure an overall strategy that is deliverable and sufficiently flexible to respond to change.

Report Structure

- 1.10 The report is structured into the following sections:
- **Section 2.0** –sets out the housing policy context at a national and local level;
 - **Section 3.0** – reviews the robustness of the Council’s evidence on housing need within the City, and whether the Council is seeking to meet its OAHN;
 - **Section 4.0** – identifies a new OAHN;
 - **Section 5.0** – considers the integration of student housing needs;
 - **Section 6.0** – reviews the Council’s approach to factoring in backlog;
 - **Section 7.0** - provides a summary and conclusion on the City of York’s housing need;
 - **Section 8.0** –reviews the Council’s housing trajectory and five-year housing land supply position [5YHLS] which underpin the Plan’s Proposed Modifications, in respect of realistic and reasonable lead-in times and build-out rates, including presenting a revised trajectory; and
 - **Section 9.0** –provides a summary and overall conclusion on the whether the evidence underpinning the Plan is sound, in respect of the need for both market and affordable homes and the housing trajectory, and provides recommendations in respect of these matters.

2.0 **Housing Need**

Introduction

- 2.1 This section sets out the requirements of the Framework and the Practice Guidance in objectively assessing housing needs. This is in the context that the Council's Local Plan was submitted during the transitional arrangements for the 2019 National Planning Policy Framework [NPPF]. That said, the standard method for calculating housing need set out in the NPPF (and set out in more detail in the revised 2019 Practice Guidance), provides relevant context for the direction of change the Government has moved towards, and the unwavering emphasis of seeking to substantially boost the supply of housing to attain an overall national target of 300,000 dwellings per year.
- 2.2 This will provide the benchmark against which the 2019 HNA will be reviewed, to ensure the necessary requirements are met. In addition, relevant High Court judgments have been referenced to set out the requirements of an OAHN calculation in a legal context.

National Planning Policy Framework

- 2.3 The 2012 NPPF outlines that local planning authorities [LPAs] should positively seek opportunities to meet the development needs of their area (paragraph 14). It adds that, in order to “*boost significantly*” the supply of housing, they should “*use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the framework...*” (paragraph 47)
- 2.4 The NPPF (paragraph 159) specifies the evidence required to objectively define housing needs within an area, setting out that LPAs should:
- "Prepare a Strategic Housing Market Assessment to assess their full housing needs... identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:*
- *Meets household and population projections, taking account of migration and demographic change;*
 - *Addresses the needs for all types of housing, including affordable housing...; and*
- Caters for housing demand and the scale of housing supply necessary to meet this demand."*

2019 NPPF

- 2.5 The Revised Framework was published in February 2018. It has an unequivocal emphasis on housing, with the introduction to the 2018 consultation proposals clarifying that the country needs radical, lasting reform that will allow more homes to be built, with the intention of reaching 300,000 net additional homes a year.
- 2.6 The 2019 NPPF states that to support the Government's objective of “*significantly boosting the supply of homes*”, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay [S59].

2.7 In particular:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”. [S60]

2.8 The revision also makes clear that when identifying the housing need, policies should also break the need down by size, type and tenure of homes required for different groups in the community (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes) [S61].

2.9 Paragraphs 67 - 76 also set out how Councils should identify and maintain a five-year supply of housing against their housing requirement.

2.10 In terms of the weight that can be attached to this key policy document, it is accepted that paragraph 214 to Annex 1 of the NPPF states that the policies in the previous Framework will apply for the purposes of examining plans, where those plans were submitted on or before the 24th January 2019.

2.11 However, the 2019 NPPF remains a useful indicator of the direction of travel, not least with the approach to be taken to defining housing need, which has already been the subject of an earlier consultation (*‘Planning for the right homes in the right places’*, September 2017), to which MHCLG published a summary of consultation responses and its view on the way forward in March 2018.

Planning Practice Guidance

2.12 The Planning Practice Guidance [PPG] contains a section providing guidance on housing and economic development needs assessments. It identifies that whilst there is no one methodological approach, an OAHN should fulfil the following criteria:

- be proportionate and not consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur (ID: 2a-003);
- be based on facts and unbiased evidence. Constraints should not be applied to the overall assessment of need (ID: 2a-004);
- utilise household projections published by the Department for Communities and Local Government as the starting point estimate of overall housing need (ID: 2a-015);
- consider sensitivity testing, specific to local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates (ID: 2a-017); and
- take account of employment trends (ID: 2a-018), appropriate market signals including market indicators of the balance between the demand for and supply of dwellings (ID: 2a-019) and affordable housing needs (ID: 2a-029).

2019 Planning Practice Guidance

2.13 Following on from the revisions to the Framework, on 13th September 2018 MHCLG

published its revised PPG on Housing and economic land availability assessment covering changes to the 5YHLS approach, whilst on 20th March 2019 MHCLG updated its Housing and economic needs assessment to factor in the calculation of Local Housing Need via the standard methodology.

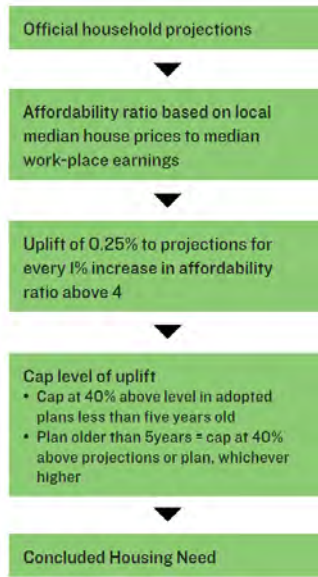
- 2.14 Regarding housing delivery, the PPG sets out how local authorities should identify and maintain a 5-year supply of specific deliverable sites, bringing the Guidance into line with recent Ministerial statements and High Court Judgements. In particular, it clarifies that along with older peoples' housing, all student accommodation can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market.
- 2.15 Furthermore, LPAs should deal with deficits or shortfalls against planned requirements within the first 5 years of the plan period (i.e. the 'Sedgefield' approach to backlog).
- 2.16 In terms of the Local Housing Need [LHN] assessment, this takes forward the approach set out in CLG's September 2017 consultation on "*Planning for the right homes in the Right Places*". The new approach to a standard method for calculating local housing need, including transitional arrangements, is set out and as before, consists of three components.
- 2.17 This uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply¹. This takes an average of the household projections over a 10-year period and adjusts them based on the affordability of the area. A cap may be applied which limits the increase, depending on the current status of relevant policies for housing.
- 2.18 The PPG states that:
"The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes."
- 2.19 If an authority uses a different method for calculating housing need the PPG sets out how this should be tested at examination:
"Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point."
"Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination."³
- 2.20 The various stages are set out in Figure 1.

¹ 2a-002-20190220 [CD/021]

² 2a-002-20190220

³ 2a-015-20190220[CD/021]

Figure 1 Methodology for determination of LHN



Source: Lichfields

2.21 Applying this revised approach to the standard methodology would result in a LHN figure of **1,069 dpa** for the City of York. This represents the minimum number of homes needed per year as set out in paragraph 60 of the revised Framework (February 2019).

2.22 This is calculated using the 2014-based household projections for 2019-2029, which equates to household growth of 820 per annum (8,198 over the 10-year period), plus a market signals uplift of 30.4%. This latter figure has been generated as follows, based on the most recent (April 2019) affordability ratio data for the City of York:

- Median local workplace-based affordability ratio (2019) = 8.86
- deduct 4 = 4.86
- divide by 4 = 1.215
- multiply by 0.25 = 0.304 (30.4%).

2.23 No cap is applied as the capped figure is greater than the minimum LHN figure.

Relevant Caselaw

2.24 There have been several key legal judgments which provide clarity on interpreting the NPPF and PPG in terms of how to address the issue of affordable housing need in the context of arriving at a concluded figure for OAHN:

- 1 'Satnam Millennium Limited and Warrington Borough Council [2015] EWHC 370' referred to as "Satnam";
- 2 'Kings Lynn and West Norfolk Borough Council v Secretary of State for Communities and Local Government [2015] EWHC 2464' referred to as "Kings Lynn";
- 3 'Barker Mill Estates Trustees v Test Valley BC & Secretary of State for Communities and Local Government [2016] EWHC 3028 (Admin)' referred to as "Barker Mill"; and

- 4 ‘Jelson Ltd. v Secretary of State for Communities and Local Government, Hinckley and Bosworth Borough Council [2018] EWCA Civ 24’ referred to as “Hinckley and Bosworth”.

Satnam

- 2.25 Satnam highlights the importance of considering affordable housing needs as part of – and not separate to – concluding on OAHN. The decision found that the adopted OAHN figure within the Warrington Local Plan was not in compliance with policy in respect of affordable housing because (as set out in paragraph 43) the assessed need for affordable housing was never expressed or included as part of OAHN. The judgment found that the “proper exercise” had not been undertaken, namely:

“(a) having identified the OAHN for affordable housing, that should then be considered in the context of its likely delivery as a proportion of mixed market/affordable housing development; an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes;

(b) the Local Plan should then meet the OAHN for affordable housing, subject only to the constraints referred to in NPPF, paragraphs 14 and 47.”

- 2.26 In summary, this judgment establishes that OAHN has to include an assessment of full affordable housing needs and is not a ‘policy-on’ judgement in determining the housing requirement.

Kings Lynn

- 2.27 Kings Lynn helps establish how full affordable housing needs should be addressed as part of an OAHN calculation. The judgment identifies that it is the function of a SHMA to address the needs for all types of housing including affordable, but not specifically to meet all these needs in full.

- 2.28 The relevant passage on this is to be found in paragraphs 35 to 36 of the judgment:

“At the second stage described by the second sub-bullet point in paragraph 159, the needs for types and tenures of housing should be addressed. That includes the assessment of the need for affordable housing as well as different forms of housing required to meet the needs of all parts of the community. Again, the PPG provides guidance as to how this stage of the assessment should be conducted, including in some detail how the gross unmet need for affordable housing should be calculated. The Framework makes clear these needs should be addressed in determining the FOAHN, but neither the Framework nor the PPG suggest that they have to be met in full when determining that FOAHN. This is no doubt because in practice very often the calculation of unmet affordable housing need will produce a figure which the planning authority has little or no prospect of delivering in practice. That is because the vast majority of delivery will occur as a proportion of open-market schemes and is therefore dependent for its delivery upon market housing being developed. It is no doubt for this reason that the PPG observes at paragraph ID 2a-208-20140306 as follows:

“The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered

by market housing led developments. An increase in total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.'

This consideration of an increase to help deliver the required number of affordable homes, rather than an instruction that the requirement be met in total, is consistent with the policy in paragraph 159 of the Framework requiring that the SHMA "addresses" these needs in determining the FOAHN. They should have an important influence increasing the derived FOAHN since they are significant factors in providing for housing needs within an area." (Lichfields' emphasis)

- 2.29 The judgment is clear that the correct method for considering the amount of housing required to meet full affordable housing needs is to consider the quantum of market housing needed to deliver full affordable housing needs (at a given percentage). However, as the judgment sets out, this can lead to an OAHN figure which is so large that an LPA would have "little or no prospect of delivering [it] in practice". Therefore, it is clear from Kings Lynn that although it may not be reasonable and therefore should not be expected that the OAHN will include affordable housing needs in full, an uplift or similar consideration of how affordable needs can be 'addressed' is necessary as part of the OAHN calculation. This reflects paragraph 159 of the NPPF.

Barker Mill

- 2.30 The Barker Mill High Court judgment considered uplifts to OAHN to address affordable housing need in the context of a challenge to a Local Plan. The judgment, in the context of a Local Plan process, placed consideration of an uplift for affordable housing into the second of a two-stage process, the first being calculation of OAHN and the second being a 'policy-on' adjustment (i.e. one that is made through the Local Plan process and thus not part of the OAHN). There is a tension between the findings in this judgment and Kings Lynn.

Hinckley and Bosworth

- 2.31 This judgment is relevant in the context of the findings of the above Barker Mill judgment. In short, in considering the refusal of planning permission for housing, the Inspector in this case, as a matter of planning judgment, accepted the need for affordable housing to make up a necessary component of OAHN for housing in the council's area, or in the context of the Barker Mill judgment, as part of the first stage calculation of OAHN.

"This case is not analogous to Hunston Properties Ltd. and Gallagher Estates Ltd., where the decision-maker had adopted a level of housing need constrained by policy considerations – so called "policy-on" factors, as they were referred to in Gallagher Estates Ltd.. As Mr Phillipot and Ms Osmund-Smith submitted, the figure of 450 dwellings per annum identified by the inspector as the upper end of her range was not, in fact, a "constrained" figure. In her view, as a matter of planning judgment, it sufficiently embraced the need for affordable housing as a necessary component of the "full, objectively assessed needs" for housing in the council's area. It was the result not of a policy-driven subtraction from the figure of 375 dwellings per annum at the lower end of her range – the figure based on "demographic-led household projections" – but of an appropriate addition to that figure to ensure that the need for affordable housing was not omitted or understated. As the inspector clearly appreciated, a simple addition of the figures of 375 dwellings per annum in the

column headed "Demographic-Led Household Projections to 2031" in Table 84 of the SHMA and 248 dwellings per annum in the column headed "Affordable Housing Need per Annum" would have been inappropriate. That would have been, to some degree, double-counting. Planning judgment was required in gauging a suitable uplift to take account of the need for affordable housing, without either understating or overstating that need. The inspector grasped that. She exercised her planning judgment accordingly, doing the best she could on the evidence before her." (para 36).

- 2.32 It is also worth noting in this regard that this judgment makes the following comment regarding the Planning Advisory Service (PAS) Technical Advice Note which is sometimes cited at Local Plan Examinations as a reason for excluding affordable housing as a policy-off in terms of OAHN:

"This is not an official document and the relevant paragraphs cited do appear not to be consistent with case law... It would, of course, have been better had the Inspector either not referred to the Advice at all or recognised that it was (at least arguably) inconsistent with case law."

Housing Need Local Policy Context

- 2.33 Before setting out a critique of CYC's housing OAHN evidence base, it is important to recognise that the Council has never had an adopted Local Plan for the City (under the 1971 Act, the 1990 Act or the 2004 Act) and progress on the current Local Plan has been, it is not unfair to say, glacial.
- 2.34 The development plan for York comprises two policies⁴ and the Key Diagram of the partially revoked Yorkshire and Humber Regional Strategy (2008) [YHRS]. There is no adopted Local Plan for York that forms part of the development plan. Instead, there is a long history of failed attempts to produce an adopted Local Plan.
- 2.35 The Council published the 'York Local Plan - Preferred Options' document for consultation in summer 2013, followed by a 'Further Sites' consultation for six weeks in summer 2014, which included potential new sites and changes to the boundaries of some of the sites originally identified. Following these consultations, a 'Publication Draft Local Plan and Proposals Map' was considered by the Local Plan Working Group [LPWG] and by Cabinet in September 2014⁵. With the intention of progressing a Framework compliant Local Plan, the Cabinet resolved to carry through the LPWG's recommendations and approve the Local Plan Publication Draft for public consultation, subject to amendments circulated at the Cabinet meeting and to instruct officers to report back following the consultation with a recommendation on whether it would be appropriate to submit the Publication Draft for public examination.
- 2.36 However, at the Full Council on 9th October 2014⁶ a resolution was made to halt the public consultation on the Local Plan Publication Draft in order to reassess objectively assessed housing requirements. The resolution also instructed officers to produce a report on the housing trajectory to be brought back to the next meeting of the LPWG in November 2014 along with the relevant background reports. The intention was for the

⁴ Both relating to Green Belt, requiring its inner boundaries to be defined in a plan and confirming that the general extent is about 6 miles out from the City centre

⁵ Cabinet Meeting Thursday 25 September 2014 - Minutes

⁶ Resolutions and proceedings of the Meeting of the City of York Council held in Guildhall, York on Thursday, 9th October 2014

report to allow the LPWG to agree an accurate analysis of the housing trajectory that is objective, evidence based and deliverable. The analysis was to be used to “*inform housing allocations and a new proposed Local Plan to be brought back to the next LPWG for discussion and recommendation to Cabinet in November.*”

2.37

The Council published the following ‘further work’ on the Local Plan relating to housing needs after the Full Council resolution to halt the Publication Draft Local Plan in 2014:

- 1 In December 2014, the LPWG considered a report on ‘*Housing Requirements in York*’ which was based on two background documents produced by Arup⁷. The report set out four different housing requirement figures that were considered sound against the evidence base and three options for progressing the work on housing requirements. The LPWG members agreed a housing requirement figure of 926dpa⁸;
- 2 In September 2015 the LPWG considered an update on the ‘*Objective Assessment of Housing Need*’ [OAHN] report produced by Arup⁹ and a report on ‘*Economic Growth*’¹⁰. The Arup report concluded that the housing ‘requirement’ should be in the range of 817 dwellings per annum [dpa] to 854dpa between 2012 and 2031. The LPWG’s recommendations were that the Executive Committee note the Arup OAHN report and endorse further work, including an evaluation of any spatial and delivery implications, on two scenarios for economic growth that would be reported back to the LPWG in due course;
- 3 In Autumn 2015 the Council commissioned GL Hearn jointly with Ryedale, Hambleton and the North York Moors National Park Authority to undertake a Strategic Housing Market assessment [SHMA]¹¹. This study aimed to provide a clear understanding of housing needs in the City of York area. The SHMA was published as part of a suite of documents for the LPWG meeting on 27th June 2016. It concluded that the OAHN for the City of York was in the order of 841dpa.
- 4 On the 25th May 2016 ONS published a new set of (2014-based) sub national population projections [SNPP]. These projections were published too late in the SHMA process to be incorporated into the main document. However, in June 2016 GL Hearn produced an Addendum¹² to the main SHMA report which briefly reviewed key aspects of the projections and concluded that the latest (higher) SNPP suggested a need for some 898dpa between 2012 and 2032. However due to concerns over the historic growth within the student population, the Addendum settled on a wider OAHN range of 706dpa - 898dpa, and therefore the Council considered that it did not need to move away from the previous 841dpa figure.
- 5 DCLG published updated 2014-based sub-national household projections [SNHP] in July 2016. GL Hearn was asked by City of York Council to update the SHMA to take account of these new figures and to assess the representations received through the Preferred Sites Consultation [PSC] relating to OAN. The GL Hearn SHMA Addendum Update (May 2017) subsequently updated the demographic starting point for York based on these latest household projections. The 2014-based SNHP increases the demographic starting point from 783 dpa (in the 2016 SHMA) to 867 dpa. In their Update, GL Hearn then applied a 10% uplift to the 867 dpa starting point to account for market signals and affordable housing need and identifies a

⁷ Assessment of the Evidence on Housing Requirements in York (Arup, May 2013) & Housing Requirements in York: Evidence on Housing Requirements in York: 2014 Update (Arup, September 2014)

⁸ Local Plan Working Group 17 December 2014 - Minutes

⁹ Evidence on Housing Requirements in York: 2015 Update – Arup (August 2015)

¹⁰ York Economic Forecasts – Oxford Economics (May 2015)

¹¹ GL Hearn (June 2016): City of York Council Strategic Housing Market Assessment

¹² GL Hearn (June 2016): City of York Council Strategic Housing Market Assessment - Addendum

resultant housing need of 953 dpa. However, a cover sheet to GL Hearn’s Update, entitled ‘Introduction and Context to objective Assessment of Housing Need’ was inserted at the front of this document by the Council. This states that 867 dpa is the relevant baseline demographic figure for the 15-year period of the plan (2032/33). The Council rejected the 953 dpa figure on the basis that GL Hearn’s conclusions stating:

“...Hearn’s conclusions were speculative and arbitrary, rely too heavily on recent short-term unrepresentative trends and attach little or no weight to the special character and setting of York and other environmental considerations.”

2.38 As a result of this approach, the February 2018 City of York Publication Draft stated in Policy SS1: Delivering Sustainable Growth for York, the intention to:

“Deliver a minimum annual provision of 867 new dwellings over the plan period to 2032/33 and post plan period to 2037/38.”

2.39 The supporting text to this policy makes no mention of the 953 dpa OAHN figure, but instead claims that 867 dpa is “an objectively assessed housing need” [S3.3].

2.40 To bring this up to date, and as set out above, the Council has now revised the OAHN down even further in light of GL Hearn’s January 2019 HNA, which (based on the latest 2016-based SNHP) recommends a housing need figure of **790 dpa**.

2.41 Lichfields has submitted representations on behalf of housebuilders to the various stages of the York Local Plan formulation as and when the OAHN has been updated over the past 3 years. Our most recent representation, made on behalf of a consortium of housebuilders in March 2018, concluded that the OAHN should be increased to 1,150 dpa based on the 2014-based SNHP, with accelerated headship rates, a market signals uplift of 20% and a further 10% uplift to address a critical shortfall of affordable housing.

2.42 The remainder of this section provides an overview of the findings of the latest 2019 HNU.

Overview of the City of York HNU

2.43 The stated purpose of GL Hearn’s Housing Needs Update [HNU] is to review the housing need in York taking into account of the latest demographic information. In particular, it reviews the impact of the 2016-based SNPP, equivalent 2016-based SNHP, and the 2017 Mid-Year Estimates. The analysis models housing need from 2012-37 to be consistent with the Local Plan, although because there is a known population for 2017 the data up to this point is fixed.

2.44 The HNU also reviews the latest evidence on market signals within the City. The report states that this is not a full trend-based analysis but rather a snapshot of the latest evidence to be read in conjunction with the full SHMA document. As such, the report does not revisit the affordable housing need for the City, nor does it update analysis on the mix of housing required or the needs for specific groups.

2.45 The report [Table 2] finds that over the 2016-39 period, the 2016-based SNPP projects an increase in population of around 17,622 people (8.5%) in York. This is significantly lower than the 2014-based SNPP (29,622), which represents a huge difference of 12,000 residents.

2.46 The reason for this is considered by GL Hearn to be a combination of 3 factors that are reflected in the 2016 National Population Projections – a substantial fall in (net)

international migration; a fall in fertility rates; and a reduction in the life expectancy of the so-called ‘golden cohort’ born between 1923 and 1938.

- 2.47 GL Hearn concludes that “*given the more recent trend of falling rates the 2016 based projections loos to reflect this to a greater extent than the 2014-based projections which show an immediate and significant improvement which is not founded on the most recent trends*” [paragraph 2.7].
- 2.48 The analysis models a range of demographic scenarios, including 2017 MYE population data and 10-year migration trends. The growth in population ranges from just 24,036 under the latest 2016-based SNPP between 2012 and 2037, to 36,348 using the 2014-based SNPP. The 10-year migration scenario sits within this range, at +26,078.
- 2.49 GL Hearn examines the household formation rates that underpin the latest round of 2016-based household projections. They highlight the fact that concerns have been raised regarding their robustness:

“The criticism mostly stems from the fact that the new projections do not have the ability to meet the Government’s housing target of 300,000 homes per annum once the standard methodology is applied to them.” [paragraph 2.18]
- 2.50 GL Hearn notes that by focussing on shorter term trends ONS have effectively ‘locked in’ deteriorations in affordability and subsequently household formation rates particularly within younger age groups in that time.
- 2.51 The analysis [§2.28] finds that by applying the headship rates within the 2014-based SNHP the level of housing need would be 629 dpa, incorporating a 3% allowance for vacancy/second homes – this is c.30% higher than the figure (484 dpa) derived in the HNU for the main demographic-based projection. The part return to previous household formation trends for younger age cohorts (linking to the 2014-based SNHP) increases this still further, to 679 dpa.

Table 1 Projected Household Growth 2012-32 - Range of demographic based scenarios

	Change in households	Dwellings (per annum)
2016-based SNHP HRRs	11,744	484
2014-based SNHP HRRs	15,256	629
Part Return to trend	16,492	679

Source: GL Hearn (January 2019): City of York Housing Need Update, Table 6

- 2.52 Moving on, GL Hearn models a series of economic growth forecasts, settling on 650 jobs per annum as this is considered to align with the ELR Update. In this regard, they conclude that the level of housing associated with the economic growth projections in the ELR Update (September 2017) which project growth of 650 jobs annually between 2014-31. Using the OBR economic activity rates and keeping unemployment rates, double jobbing and commuting ratios constant, this equates to a need for 590 dpa based on the 2016-based HRRs, rising to 735 dpa using the 2014-based HRRs and up to **790 dpa** using part-return to trend HRRs.

Market Signals

- 2.53 With regard to market signals, the HNU notes that
 - Lower quartile house prices in York exceed that of England by £30,000 despite having a similar overall median house price. “*Relatively higher values within a*

lower quartile housing range suggests that those with lower incomes (such as first-time buyers) feel greater housing pressure and are less likely to be able to afford a property” [paragraph 4.2].

- The gap of median house price growth between York and North Yorkshire has widened from 10 years ago. Since 2008 the rate of change for York has been 1.25, similar to the national growth of 1.3 [4.10].
- Median rental values in York are £745, £70 higher than the rest of England and £220 higher than Yorkshire and the Humber region [4.13]. LQ rental price growth has increased by 14% over the past 5 years, compared to 11% nationally [4.14];
- *“The data demonstrated that rental housing has overall become more unaffordable in the past 5 years, but increasingly so amongst lower-value properties. This could be linked to a lack of affordability in the purchase market forcing a greater level of competition for rental properties” [4.15];*
- York has a median affordability ratio of 8.62 and a 5-year rate of change equal to 1.88, compared to 5.90 for Yorkshire and the Humber (0.55 change) and 7.91 (1.14 change) for England [Table 12]. Affordability at a lower quartile [LQ] level is lower (at 7.26) and is below the national rate of 9.11, although it is still much higher than the regional rate of just 5.73;
- *“The affordability statistics and the market signals reveal that as a whole, York is becoming increasingly more unaffordable and that a market signals adjustment in the City is necessitated” [4.19].*
- An uplift of 15% is considered reasonable by GL Hearn. This is higher than the 10% previously recommended in the September 2017 SHMA Update. *“Such an uplift applied to the demographic starting point (484 dpa) would arrive at an OAN of 557 dpa...This is some way short of both the adjusted demographic growth and the economic growth. Therefore the OAN should remain as 790 dpa in order to achieve both improvements to household formation and meet economic growth. This equates to an increase of 63% from the start point.” [4.34-4.35]*

2.54 Regarding **affordable housing need**, this has not been reassessed in the HNU. It notes that the previous SHMA identified a net affordable housing need of 573 dpa:

“The affordable housing evidence suggests that a modest uplift to the demographic-based need figure to improve delivery of affordable housing in the City may be justified.” [4.21]

2.55 However, GL Hearn then reviews a number of High Court judgements and Local Plan Inspectors reports (including the Cornwall Local Plan Inspector’s preliminary findings) and concludes that *“the expectation is that it may be necessary, based on the affordable needs evidence to consider an adjustment to enhance the delivery of affordable housing, but that does not need to be done in a mechanical way’ whereby the affordable need on its own drives the OAN” [4.28].* No further uplift is made.

2.56 The HNU concludes that the 2016-based SNPP provide a more robust assessment of population growth for York than their predecessor, which is “ratified by more recent population estimates” [5.2]. Uplifting the 2016-based SNPP to meet an economic growth of 650 jobs per annum and adjusting household formation rates equates to a need for 790 dpa, which GL Hearn considers to be the OAHN on the grounds that this *“would be sufficient to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs”*. [5.11]

3.0

Critique of the SHMA Update

Introduction

- 3.1 The Companies represented by Lichfields have serious concerns and wish to raise strong objections to the way in which the Council has chosen to identify an OAHN of 790 dpa (reducing this down from the already unsatisfactory 867 dpa) and the subsequent identification of this need as the housing requirement in the Policy SS1 of the Modified LPP.
- 3.2 This section provides a critique of GL Hearn’s City of York Housing Needs Update [HNU].

Starting Point and Demographic-led Needs

Population Change

- 3.3 The Practice Guidance¹³ sets out that in assessing demographic-led housing needs, the latest CLG Household Projections form the overall starting point for the estimate of housing need, but these may require adjustments to reflect future changes and local demographic factors which are not captured within the projections, given projections are trend based. In addition, it states that account should also be taken of ONS’ latest Mid-Year Estimates [MYEs]¹⁴.
- 3.4 This previous guidance has of course been amended in the revised Practice Guidance, published in March 2019, which now formalises the standard methodology to calculate Local Housing Need. This is founded on the previous 2014-based SNHP rather than the more recent 2016-based equivalents as they “provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes”¹⁵.
- 3.5 GL Hearn accepts in paragraph 2.18 of its HNU that the 2016-based projections do not have the ability to meet the Government’s housing target of 300,000 homes per annum. In the Government’s Technical Consultation on updates to national planning policy and guidance (October 2018), the Government clarified that the 2016-based projections are not a justification for lower housing need, because:

“1 Basing the assessment of local housing need on 2016-based household projections, would either not support the Government’s objective of significantly boosting the supply of homes (if other variables were unchanged) or produce major distributional changes that would produce instability for local planning authorities in general (if other variables were changed to produce an aggregate consistent with other estimates)...

2 Although the Government generally recommends the use of the latest data in producing assessments of housing need, in this case there have been substantial changes in the method for producing the projections that have resulted in major changes in the distribution of households nationally, and the Government would like to see the new method settling down before making a decision on whether this data provides the best basis for planning” [paragraph 27]

¹³ Practice Guidance - ID 2a-015-20140306

¹⁴ Practice Guidance - ID 2a-017-20140306

¹⁵ Practice Guidance - ID: 2a-005-20190220

- 3.6 These recommendations were subsequently taken forward into the revised NPPF and Practice Guidance following the consultation:

“Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination.

Any method which relies on using the 2016-based household projections will not be considered to be following the standard method as set out in paragraph 60 of the NPPF. As explained above, it is not considered that these projections provide an appropriate basis for use in the standard method”¹⁶.

- 3.7 We acknowledge that the City of York Local Plan was submitted to the Secretary of State for Examination before 26th January 2019 and therefore should be examined under the transitional arrangements (i.e. the 2012 NPPF and 2014 Practice Guidance). For this reason, the LHN calculated by the standard method would not apply.

- 3.8 Furthermore, we accept that in accordance with the 2014 version of the Practice Guidance, GL Hearn is correct to at least model the 2016-based SNPP/SNHP; that does not necessarily mean it is right to use the much lower projections to directly inform the OAHN without making reasonable adjustments, particularly in light of the Government’s clearly stated objective to build more homes consistent with the 300,000 target by the mid-2020s, not to use potentially flawed projections to provide even fewer homes:

“Population changes are only one aspect of the driver for housing supply. Rising incomes, changing social preferences and factors such as real interest rates and credit availability contribute to demand for housing. In summary, the Government’s judgment is that these factors combine to indicate that there is no need to change its aspirations for increasing housing supply. This is consistent with the argument in the housing White Paper that the ambition of delivering more homes should be about both keeping pace with population growth and looking to address worsening affordability through tackling the previous undersupply of homes.”¹⁷

- 3.9 The 2016-based SNHP/SNPP should be sensitivity tested, based on alternative assumptions around underlying demographic projections, based on established sources of robust evidence:

“The household projections produced by the Department for Communities and Local Government are statistically robust and are based on nationally consistent assumptions. However, plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates. Account should also be taken of the most recent demographic evidence including the latest Office for National Statistics population estimates.

Any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence.

¹⁶ Practice Guidance - ID: 2a-015-20190220

¹⁷ MHCLG (October 2018): *Technical consultation on updates to national planning policy and guidance*, paragraph 12

Issues will vary across areas but might include:

- *migration levels that may be affected by changes in employment growth or a one off event such as a large employer moving in or out of an area or a large housing development such as an urban extension in the last 5 years*
- *demographic structure that may be affected by local circumstances or policies e.g. expansion in education or facilities for older people.*¹⁸

3.10 This is explored in more detail below.

The use of longer-term trends

3.11 The PPG is clear that household projections are the starting point for overall housing need and that these are nationally consistent and statistically robust¹⁹. It goes on to state that plan-makers may consider sensitivity testing based on local circumstances, but that this must be based on established sources of robust evidence²⁰. Some of circumstances it cites includes migration levels which are affected by changes in employment, such as a large employer moving to the area or urban extension, or where demographic structures are affected by policies related to specific groups, e.g. expansion in education facilities or facilities for older people.

3.12 The use of short-term trends means recent changes in trends are picked up more quickly, although if recent trends are not representative of the longer term 'norm' they may over or under estimate future need (hence ID 2a-017). Whilst longer term periods can allow unusual trends to be ironed out, they may fail to pick up recent changes and therefore may also over or under-estimate future need. Despite these advantages and disadvantages, it is set out within Government guidance that the official projections – i.e. short-term trends – should provide the starting point for housing needs assessment.

3.13 The question therefore is whether, in York, there are any “*specific local circumstances*” (e.g. movement of major employers, higher education expansion, etc, as cited in ID 2a-017) in recent years which mean that it is not appropriate to use the official 2016-based SNPP and that a longer-term trend is more appropriate. The HNU does not even attempt to speculate about any such events occurring in York, instead concluding that the projections “*provide a more robust assessment of population growth for York than their predecessor*” [paragraph 5.2], and that this has been ratified by more recent population estimates.

3.14 GL Hearn has referred to the Cornwall Local Plan Inquiry (paragraph 4.27) when discussing affordable housing needs. It is therefore relevant to note that the use of long-term trends was accepted at the Cornwall Local Plan by the Inspector in 2015. That Inspector preferred long term trends specifically over the 2008-12 period (i.e. the 2012-based projection base period) and noted that this was to “*even out the likely effect of the recent recession on migration*” (see SHMA para 3.41).

3.15 We can ascertain whether there have been any unusual or one-off circumstances in the City of York specifically which warrant the use of long-term trends over short term trends by looking at historic completions and migration data (an exercise only partially undertaken in the HNU).

¹⁸ Practice Guidance - ID: 2a-017-20140306

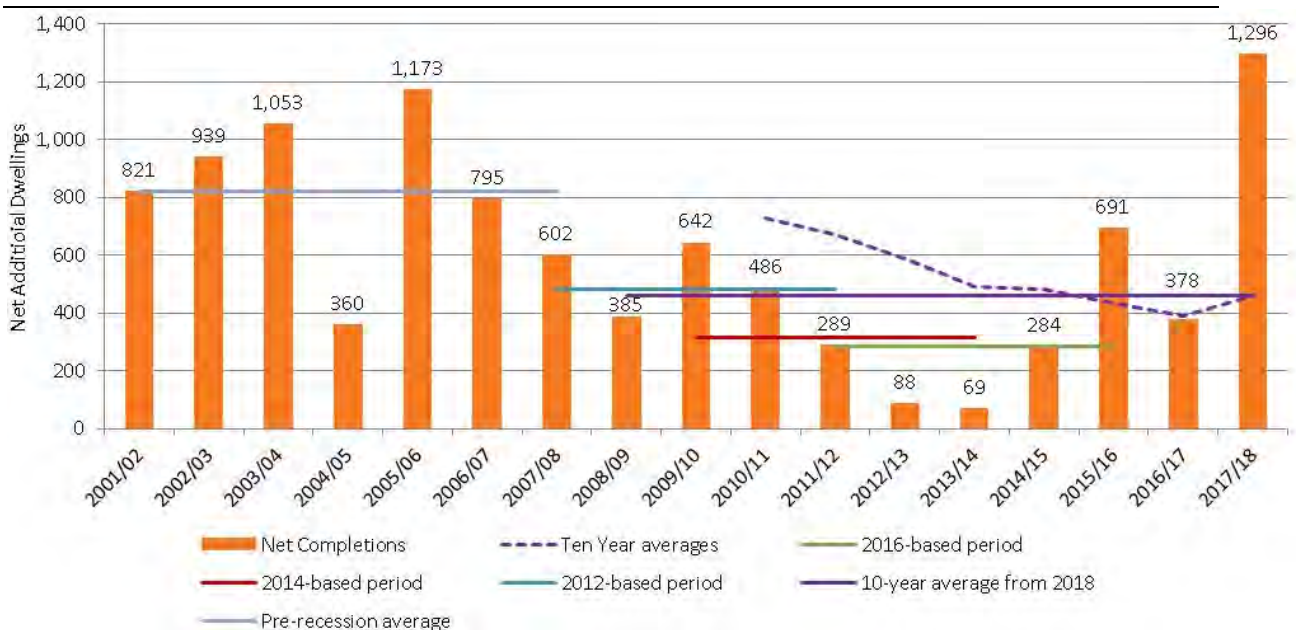
¹⁹ Practice Guidance - ID: 2a-015-20190220

²⁰ Practice Guidance - ID: 2a-017-20190220

Housing completions

- 3.16 Figure 2 show completions in the City of York back to 2001/02, along with the 10-year averages. It shows that in the 7 years up to the recession (2007/08), average completions were 820 per annum. Since then completions have been rapidly falling, with the average declining to just 461 dpa for the 10 years to 2017/18.
- 3.17 In the base period for the 2012-based projections, completions were slightly higher, at 481 dpa. The 2014-based projections are even lower, at 315 dpa. However, the most recent 2016-based projections draw upon a period where average completions were lower than any of the comparator time periods, of just 284 dpa, picking up the steady decline of housebuilding in York that fell to a pitiful 69 dwellings in 2013/14. The 2016-based SNPP does not draw upon data for the past two years, which have averaged 837 dpa, including an impressive 1,296 dwellings in 2017/18. This suggests that housebuilding is recovering to levels that were consistently seen in the boom years prior to the recession.
- 3.18 Based on housebuilding levels, in light of the very large differences seen in each period, it is clear that the 2016-based SNPP is based on a time period when the level of housebuilding might reasonably be said to be at an unusually low level, which could suggest that there is justification to make suitable adjustments.
- 3.19 Overall the trends suggest that since the recession, there has been a gradual, steady decrease in levels of housebuilding in York, although this has started to be corrected from 2015/16 onwards. The figures suggest that over the time period that the 2016-based SNPP relies upon, there have been years in which housebuilding has been unusually low (2012/13 and 2013/14 in particular), which suggests that at the very least an adjustment should be considered to the official projections inappropriate. It is notable that no similar analysis is presented in the HNU.

Figure 2 Historic completions in the City of York - 2001/02 to 2017/18



Source: MHCLG Table 122: Net Additional Dwellings by Local Authority District

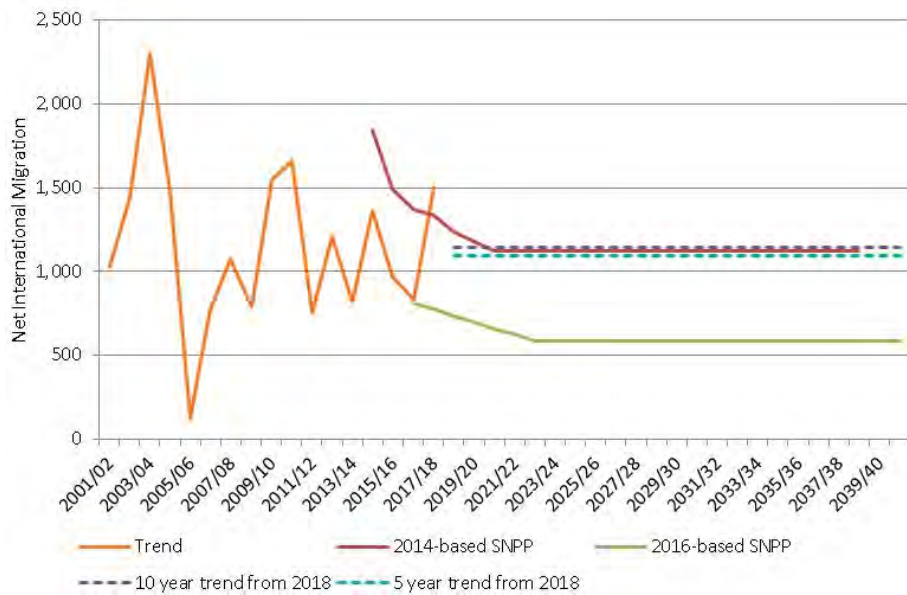
3.20 Whilst the link between housing completions and population growth is complex, it is worth noting that the latest 2018 Mid-Year population estimates suggest that the City of York’s grew by 1,730 residents, in the year in which 1,296 new dwellings were completed.

International Migration

3.21 Another way to consider whether the City of York has seen any ‘unusual’ or one-off events which mean longer term trends are more appropriate is to look at migration. Figure 3 shows historic levels of net international migration to the City of York. It is similar to GL Hearn’s Figure 4 in the HNU, but it includes more up-to-date data relating to the 2018 Mid-Year Population Estimates.

3.22 Overall the international migration figures suggest net migration rose after the recession, at a time when housebuilding was falling. Net migration peaked in 2003/04 and fell to just 127 in 2005/06. However, since that time, net migration has fluctuated between c.750 and 1,660 annually.

Figure 3 Historic Net International migration to the City of York, 2001/02 to 2017/18 and Future Projections



Source: ONS

3.23 In particular, it is clear that the 2016-based SNPP net international migration figures look anomalous compared to past trends. From 2022/23 onwards, this is adjusted down to 587 annually, a figure that is far lower than any net international migration figure for the past 17 years with the exception of 2005/06. In contrast, the 10-year trend equates to 1,143 annually (almost double the 2016-based SNPP), whilst the 5-year trend is almost as high, at 1,096. As can be seen in the Figure, the 2014-based SNPP net international migration figure sits neatly between these trends, at 1,125.

3.24 The HNU argues (in paragraph 2.11) that there is a close alignment between the 2016-based SNPP and the recorded MYE for 2016/17, which there is; however, for 2017/18 the 2016-based SNPP recorded a net international migration figure of just 774, when 1,505 were actually recorded in the 2018 MYE – almost double.

3.25 In terms of what may be causing this discrepancy, it is worth noting that the emerging Local Plan recognises that York has a large proportion of higher education students which

is set to following the expansion of the University of York and as other establishments continue to provide modern education facilities to accommodate growing student numbers [paragraph 1.48]. In particular, York St John University has experienced rapid student growth in recent years:

“The University currently has 6,500 students (FTEs) and employs 750 staff. The increase in student numbers of the last 10 years is circa 93% and it is anticipated that the total will increase to 8,000 by 2018.” [1.60]

- 3.26 It is possible that a significant proportion of these students have come from abroad, helping to boost the projections, and that this is forecast to continue for the foreseeable future.

Summary

- 3.27 ONS's 2016-based SNPP now assumes lower fertility rates, lesser improvements in life expectancy (i.e. higher death rates) and lower net international migration across the country, and York is no exception. The latter input does, however, appear excessive given past trends. Whilst we cannot place too much reliance on one years' worth of data, it is also salient to note that the 2018 MYE (and indeed the housing completions for 2018) suggest a marked upturn in growth.

- 3.28 It is considered that at the very least there should be a sensitivity testing for long term migration trends in the HNU for York based on ‘*specific local circumstances*’ (as per PPG ID 2a-017). In this respect, the HNU does not fulfil the requirements set out in ID 2a-017 regarding sensitivity testing of the official projections.

Market Signals

- 3.29 The Framework sets out the central land-use planning principles that should underpin both plan-making and decision-taking. It outlines twelve core principles of planning that should be taken account of, including the role of market signals in effectively informing planning decisions:

“Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.” [S17]

- 3.30 The Practice Guidance²¹ requires that the housing need figure as derived by the household projections be adjusted to take into account market signals. It indicates that comparisons should be made against the national average, the housing market area and other similar areas, in terms of both absolute levels and rates of change. Worsening trends in any market signal would justify an uplift on the demographic-led needs. In addition, the Practice Guidance²² highlights the need to look at longer term trends and the potentially volatility in some indicators.

- 3.31 The Practice Guidance also sets out that:

“...plan-makers should not attempt to estimate the precise impact of an increase...rather they should increase planning supply by an amount that, on reasonable assumptions...could be expected to improve affordability...”²³.

²¹ Practice Guidance - ID 2a-019-20140306

²² Practice Guidance - ID 2a-020-20140306

²³ *ibid*

- 3.32 This clearly distinguishes between the demographic-led need for housing (generated by population and household growth) and the market signals uplift which is primarily a supply response over and above the level of demographic need to help address negatively performing market signals, such as worsening affordability.
- 3.33 As set out in detail above, GL Hearn has undertaken an analysis of market signals in its Housing Needs Update (Section 4.0). In that report, the HNU notes that
- Lower quartile house prices in York exceed that of England by £30,000 despite having a similar overall median house price;
 - The gap of median house price growth between York and North Yorkshire has widened from 10 years ago. Since 2008 the rate of change for York has been 1.25, similar to the national growth of 1.3;
 - Median rental values in York are £745, £70 higher than the rest of England and £220 higher than Yorkshire and the Humber region [4.13]. LQ rental price growth has increased by 14% over the past 5 years, compared to 11% nationally;
 - York has a median affordability ratio of 8.62 and a 5-year rate of change equal to 1.88, compared to 5.90 for Yorkshire and the Humber (0.55 change) and 7.91 (1.14 change) for England [Table 12];
- 3.34 As a consequence of these poor (and worsening) housing market signals, GL Hearn concludes that:
- “The affordability statistics and the market signals reveal that as a whole, York is becoming increasingly more unaffordable and that a market signals adjustment in the City is necessitated”* [4.19].
- 3.35 On the basis of these signals, GL Hearn applied an uplift of 15%. This is higher than the 10% previously recommended in the September 2017 SHMA Update. *“Such an uplift applied to the demographic starting point (484 dpa) would arrive at an OAN of 557 dpa...This is some way short of both the adjusted demographic growth and the economic growth. Therefore, the OAN should remain as 790 dpa in order to achieve both improvements to household formation and meet economic growth. This equates to an increase of 63% from the start point.”* [4.34-4.35]
- 3.36 In our previous representations²⁴, Lichfields concluded that based on a detailed review of similar market signals, an uplift of 20% was suitable. Nothing that GL Hearn has presented causes us to change our opinion; quite the reverse in fact, given that on many of the indicators, the housing market appears to be even more constrained and under pressure than was the case even one year ago.
- 3.37 To take a clear example, which is not examined in GL Hearn’s assessment of market signals, the Practice Guidance is clear that historic rates of development should be benchmarked against the planned level of supply over a meaningful period. Table 2 sets the Council’s various housing targets/presumed OAHN against the actual net housing completions. With the exception of the last year, housing delivery in York has missed the target each year since 2006/07. Overall delivery targets for these years was missed by c.30% which equals 3,127 units below the target level. Over the plan period from 2012/13, GL Hearn noted in its previous May 2017 SHMA Addendum [§3.14] that under-delivery may have led to household formation (particularly of younger households) being constrained and states that this point is picked up in the report which uses a demographic projection-based analysis to establish the level of housing need moving forward.

²⁴Lichfields (March 2018): *Housing Issues Technical Report*

Table 2 Rate of net housing delivery in York against possible policy benchmarks, 2004/05-2017/18

Year	Net Housing Completions	Council's OAHN (790 dpa)	
		'Need'*	+/-
2004/05	360	640	-280
2005/06	1,173	640	+533
2006/07	795	640	+155
2007/08	602	640	-38
2008/09	385	850	-465
2009/10	642	850	-208
2010/11	486	850	-364
2011/12	289	850	-561
2012/13	88	790	-702
2013/14	69	790	-721
2014/15	284	790	-506
2015/16	691	790	-99
2016/17	378	790	-412
2017/18	1,331	790	+541
Total	7,573	10,700	-3,127

Source: MHCLG LT122

*RSS assumed average 640 dpa 2005/05-2007/08; 850 dpa 2008/09 -2011/12

*MHCLG: Housing Delivery Test Results 2018

- 3.38 The SHMA Update [§3.15] considers that this past under-delivery is not a discrete part of the analysis but is one of the various market signals which indicate a need to increase provision from that determined in a baseline demographic projection. It notes that that this market signal will require upward adjustment through consideration of migration and household formation rates rather than just a blanket increase based on the level of 'shortfall'.
- 3.39 It is clear from the Council's own evidence that the City has consistently under-delivered housing, with a failure to deliver anything more than 642 dwellings in any single year between 2007 and 2015. The policy benchmarks suggest that the level of past under-delivery is 3,127 dwellings over the past 12 years.
- 3.40 **Furthermore, the Council's already low housing delivery figures have been artificially boosted by the inclusion of student accommodation in the completions figures (see discussion below).**

What scale of uplift should be applied?

- 3.41 The PPG sets out a clear two-stepped process to addressing market signals within the calculation of OAHN:
- 1 Firstly, it is necessary to determine **whether** a market signals uplift is necessary. This is set out in PPG ID2a-019 within the first sub-paragraph as follows:

“Appropriate comparisons of indicators should be made... A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.”
 - 2 Secondly, when a market signals uplift is required, it is necessary to identify at **what scale** that should be set, with guidance given that it should be set at a level that could be expected to improve affordability. This is set out in PPG ID2a-019 within the second and third sub-paragraphs as follows:

“In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable... they should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability, and monitor the response of the market over the plan period.”

3.42 The principle of a market signals uplift in York (i.e. Stage 1) is not disputed by the Council’s housing consultants. However, the scale of the uplift is disputed, principally because there is no sound basis to conclude that the uplift can be reasonably expected to improve affordability, and the HNU provides no evidence that it will do so. In addition, as previously noted, because the HNU has applied its market signals uplift to a flawed demographic-led assessment of need, any figure flowing from this is in itself also flawed.

3.43 We examine the scale of a suitable uplift in Section 4.0.

Affordable Housing Needs

3.44 In line with the 2012 Framework²⁵, LPAs should:

“...use their evidence based to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing...”

“...prepare a SHMA which...addresses the need for all types of housing, including affordable.”

3.45 The Practice Guidance²⁶ sets out a staged approach to identifying affordable housing needs, and states that affordable housing need should be:

“...considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments...an increase in the total housing figures included in the plan should be considered where it could help deliver the required number of affordable homes.”

3.46 As set out in Section 2.0, two High Court Judgements go to the heart of addressing affordable housing within the identification of OAHN. ‘Satnam’ establishes that affordable housing needs are a component part of OAHN, indicating that the ‘proper exercise’ is to identify the full affordable housing needs and then ensure that this is considered in the context of its likely delivery as a proportion of mixed market/affordable housing development. ‘Kings Lynn’ builds on ‘Satnam’, identifying that affordable housing needs *“should have an important influence increasing the derived OAHN since they are significant factors in providing for housing needs within an area.”* [S36]. This is clear that affordable housing needs are a substantive and highly material driver of any conclusion on full OAHN.

3.47 Neither the HNU nor its predecessor, the September 2017 SHMA Assessment Update, states that it does not review affordable housing need, although the latter states that the situation is unlikely to have changed significantly from the 2016 SHMA. The 2016 SHMA identified a net affordable housing need of 573 homes per annum or 12,033 dwellings over the 2012-2033 period. This suggests a worsening situation when compared with the previous figure of 486 affordable homes per annum needed in the previous 2011 SHMA, produced by GVA.

3.48 Lichfields has not analysed in detail the figures forming the assessment of affordable

²⁵ Framework - Paragraphs 47 and 159

²⁶ Practice Guidance - ID: 2a-022-20140306 to 2a-029-20140306

- housing needs, due in part to limitations on access to the underlying data; instead, Lichfields has focused on how this need has informed the OAHN conclusion.
- 3.49 The SHMA Assessment Update [§3.3] suggests that large parts of this need are either existing households (who do not generate need for additional dwellings overall) or newly forming households (who are already included within the demographic modelling).
- 3.50 It further states [§§3.17-3.18] that:
- “The City of York Council currently have an affordable housing policy of up to 30%. The SHMA identified a net affordable housing need of 573 dwellings. Based on this level of need and the current policy the City would require to deliver 1,910 dwellings per annum. To put this in context the City has only delivered more than 1000 homes once since 2004-5. Using a lower policy target would result in an even higher need.”*
- “While there is clearly an affordable housing issue in the City many of the households in need are already in housing (just housing that is not suitable for some reason such as overcrowding) and therefore do not generate a need for additional dwellings”.*
- 3.51 The provision of the net affordable housing need identified is likely to be unrealistic given past dwelling completions in City of York. With regard to this matter the SHMA Assessment Update states [§3.28]:
- “Given the balance of judgement it would appear that a 10% adjustment could be justified in York on the basis of the previously established affordable housing need the updated market signals evidence.”*
- 3.52 In taking this approach, GL Hearn is effectively conflating the uplift resulting from affordable housing need with uplift resulting from market signals analysis. These are two separate steps in the Practice Guidance and should not be combined in this manner.
- 3.53 In contrast, the HNU reiterates the 573 dpa need, and accepts that *“a modest uplift to the demographic based need figure to improve delivery of affordable housing in the City may be justified.”* [paragraph 4.20].
- 3.54 However, the HNU then reviews a number of High Court judgements and other Inspector’s reports, notably that for the Cornwall Local Plan, and concludes that *“the expectation is that it may be necessary, based on the affordable needs evidence to consider an adjustment to enhance the delivery of affordable housing, but that this does not need to be done in a ‘mechanical way’ hereby the affordable need on its own drives the OAN”.* [paragraph 4.28]
- 3.55 The HNU does not proceed to test the scale of uplift that might be appropriate to help meet this very high level of affordable housing need, merely stating in the conclusions that the employment-led 790 dpa *“would be sufficient to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs”.*
- 3.56 Policy H10 of the emerging Local Plan sets out a wide range of affordable housing requirements on residential schemes for 2 or more dwellings, with 30% at the upper end for greenfield sites containing 15 or more dwellings. Applying this optimistic upper target to the 790 dpa CoYC OAHN would potentially deliver (at best) 237 affordable units annually. This represents just 41% of the 573 dpa target.
- 3.57 At a delivery rate of 30% of overall housing, the City of York would need to deliver **1,910**

dpa to address affordable housing needs in full.

3.58 Taking into account affordable need within the calculation of OAHN does not necessarily involve a mechanistic uplift, or an indication that such identified needs must be met in full. It has to be a scenario which, on a reasonable basis, could be expected to occur. This is set out in the Kings Lynn judgment which concluded:

“...This is no doubt because in practice very often the calculation of unmet affordable housing need will produce a figure which the planning authority has little or no prospect of delivering in practice. That is because the vast majority of delivery will occur as a proportion of open-market schemes and is therefore dependent for its delivery upon market housing being developed.” [§35]

This is also consistent with the Practice Guidance²⁷ which sets out the assessment of need *“does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur.”*

3.59 However, in line with the High Court Judgments, this still needs to be an uplift of consequence, insofar as it can reasonably be expected to occur. This will inevitably need to involve judgement, based on relevant evidence, as to the extent to which any scale of uplift could be reasonably expected to occur.

3.60 For example, it is interesting to note that in the Cornwall Local Plan example that GL Hearn quotes from, the Inspector ultimately **concluded that an uplift to the OAHN was justified, and this should be equal to an additional 1,500 dwellings over the course of the Plan period**²⁸.

3.61 The HNU ultimately does not use the identified acute affordable housing needs in a way in which it has *“an important influence in increasing the derived F[ull] OAN”* as per the Kings Lynn judgment.

3.62 The Local Plan Expert Group [LPEG], in its Report to the Secretary of State for Communities and Local Government in March 2016, recommended various changes to the Practice Guidance with the remit of considering how local plan-making could be made more efficient and effective. Although very limited, if any, weight can be given to the LPEG approach given that it is not policy or endorsed by Government, it is at least helpful in seeking to understand what an appropriate response might be to define the influence of market signals and affordable housing needs. LPEG recommended changes to the preparation of SHMAs and determination of OAHN.

3.63 With regard to affordable housing need in the preparation of SHMAs and determination of OAHN it proposed that where the total number of homes that would be necessary to meet affordable housing need is greater than the adjusted demographic-led OAHN, then this figure should be uplifted by a further 10%. The 10% uplift was intended to provide a streamline approach that removes judgement and debate from the process of setting OAHN (as opposed to what might be the most accurate under current Practice Guidance).

3.64 Given the significant affordable housing need identified in City of York, Lichfields considers that this **10% uplift would be appropriate** in this instance and should be applied to the OAHN.

²⁷ Practice Guidance - ID:2a-003-20140306

²⁸ Planning Inspectorate (23rd September 2016): Inspector’s Report on the Examination into the Cornwall Local Plan Strategic Policies, paragraph 52

4.0 **OAHN – Demographic and Affordable Needs**

Introduction

4.1 In practice, applying the 2012 NPPF requires a number of key steps to be followed in order to arrive at a robustly evidenced housing target:

- The starting point for Local Plans is to meet the full objectively assessed development needs of an area, as far as consistent with the policies set out in the Framework as a whole [§6, §47 & §156].
- An objective assessment of housing need must be a level of housing delivery which meets the needs associated with population and household growth, addresses the need for all types of housing including affordable and caters for housing demand [§159].
- Every effort should be made to meet objectively assessed needs for housing and other development, and there should be positive response to wider opportunities for growth. Market signals, including affordability should be taken into account when setting a clear strategy for allocating suitable and sufficient land for development [§17].
- In choosing a housing requirement which would not meet objectively assessed development needs, it must be evidenced that the adverse impacts of meeting needs would significantly and demonstrably outweigh the benefits, when assessed against the policies within the Framework as a whole; unless specific policies indicate development should be restricted [§14].
- Where an authority is unable to meet its objectively assessed development needs or it is not the most appropriate strategy to do so, e.g. due lack of physical capacity or harm arising through other policies, it must be demonstrated under the statutory duty-to-cooperate that the unmet need is to be met in another local authority area in order to fully meet development requirements across housing market areas [§179 & §182 bullet point 1].

4.2 It is against these requirements of the Framework which the City of York's housing need must be identified.

Demographic Modelling

4.3 The Government's 2014 Practice Guidance states that "*household projections published by CLG should provide the starting point estimate of overall housing need.*" It also states that the household projection may require adjustment to reflect factors affecting local demography and household formation rates which are not necessarily captured in past trends²⁹.

4.4 To comply with the Practice Guidance, Lichfields has modelled a range of new scenarios using the PopGroup demographic modelling tool. This analysis has used headship rates from the 2014-based SNHP, 2016 SNHP and also (in a similar vein to GL Hearn in its HNU) an accelerated household formation rate to reflect a partial return to past trends. We have firstly derived the baseline demographic need, which acts as the 'starting point' when determining the housing OAN. Thereafter, various assumptions, adjustments and

²⁹ ID 2a-015-20140306

sensitivities have been applied to take account of new demographic data, local factors and economic aspirations.

- 4.5 Using the data inputs and assumptions above, the following demographic scenarios have been assessed. The scenarios are modelled over the period 2017-2033 to align with the Local Plan period (hence there is a moderate discrepancy with GL Hearn's HNU, which models over the period 2012-2037). The scenarios modelled are as follows:
- a **Scenario A: 2014-based SNPP** – using on the 2014-based SNPP, incorporating headship rates from the 2014-based SNHP, plus an allowance for vacant/second homes (1.7%);
 - Scenario Ai: 2014-based SNPP / 2018 MYE / PCU** - Applying the same assumptions as for Scenario Ai; however, it adjusts the 2015, 2016, 2017 and 2018 population figures to reflect the latest ONS Mid-Year Population Estimates. This has the effect of increasing the 2018 population figure from 212,068 to 209,893;
 - Scenario Aii: Standard Methodology** figure of 1,069 dpa is modelled.
 - b **Scenario B: 2016-based SNPP** – using the 2016-based SNPP, incorporating headship rates from the 2016-based SNHP, plus an allowance for vacant/second homes (1.7%);
 - Scenario Bi: 2016-based SNPP PCU** - Applying the same assumptions as for Scenario B; however, starting post-2017, headship rates amongst 15-34 year olds are projected to make up 50% of the difference of long term trends (as per Scenario Ai) by 2033;
 - Scenario Bii: 2016-based SNPP / 2018 MYE / PCU** - Applying the same assumptions as for Scenario Ai; it adjusts the 2015, 2016, 2017 and 2018 population figures to reflect the latest ONS Mid-Year Population Estimates. This has the effect of increasing the 2018 population figure from 209,432 to 209,893;
 - c **Scenario C: Long Term Migration Trends MYE** – based on past migration trends as observed over the last 10 years (to 2017) in the City of York, re-based to 2018 MYE population;
 - Scenario Ci: Long Term Migration Trends MYE PCU** – as above, but applying accelerated headship rates to the 15-34 age cohorts as per Scenario Ai.

Economic Scenarios

- d **Scenario D: ELR Scenario 2 Jobs Growth** – based on forecasts of annual job growth (397 jobs 2017-2018, 650 jobs p.a. between 2018 and 2033,) for the City of York to align with the ELR, applied to the 2016-based SNPP (including 2018 MYE);
 - Scenario Di: ELR Scenario 2 Jobs Growth PCU** – as above, but applying accelerated headship rates to the 15-34 age cohorts as per Scenario Ai;
 - e **Scenario E: Past Trend Job Growth** – Taking into account the Compound Average Growth Rate [CAGR] of 0.83% that was achieved between 2000-2017 in the City of York (as recorded by NOMIS Job density figures), this scenario assumes this will continue over the plan period (including 2018 MYE);
 - Scenario Ei: Past Trend Job Growth PCU** – as above, but applying accelerated headship rates to the 15-34 age cohorts as per Scenario Ai.
- 4.6 The findings of the demographic scenarios are set out in Table 3.

Table 3 Key Outputs – Demographic Scenarios for the City of York, 2017-2033

Scenario	Change in Population	Change in Households	Dwellings 2017-2033	
			Total Change	DPA
Scenario A: 2014-based SNPP	21,900	13,008	13,231	827
Scenario Ai: 2014-based SNPP / 2018 MYE / PCU	24,027	14,318	14,564	910
Scenario Aii: Standard Methodology	33,979	16,815	17,104	1,069
Scenario B: 2016-based SNPP	13,492	7,192	7,315	458
Scenario Bi: 2016-based SNPP PCU	13,492	10,685	10,868	679
Scenario Bii: 2016-based SNPP / 2018 MYE / PCU	16,038	11,107	11,297	706
Scenario C: Long Term Migration Trends MYE	23,926	10,851	11,037	690
Scenario Ci: Long Term Migration Trends MYE PCU	23,926	14,481	14,730	921

Source: Lichfields using PopGroup

- 4.7 The findings of the demographic scenarios are broadly in line with those reported in the HNU, with differences generally attributable to the different timeframes used (2017-2033 vs. 2012-2037) and our incorporation of the latest 2018 MYE in some of the Scenarios. The projections clearly demonstrate the extent to which the 2014-based SNPP are significantly higher than the more up to date 2016-based SNPP. Allowing for these differences, the equivalent scenarios in the HNU’s Table 6 include Lichfield’s Scenario B, whereby our figure of 458 dpa equates to GL Hearn’s figure of 484 dpa; and our Scenario Bi, whereby our figure of 679 dpa is identical to GL Hearn’s 679 dpa.
- 4.8 Lichfields’ view is that the demographic starting point should comprise Scenario Bii, which updates the 2016-based SNPP with the most up-to-date demographic data (the 2018 MYE) and also makes a suitable provision for accelerating household formation rates in line with long term trends. **This equates to 706 dpa.**
- 4.9 However, as set out in detail in Section 3.0, Lichfields has serious concerns regarding the accuracy of the long-term international migration rates that underpin the 2016-based SNPP and therefore consider that a case can be made to examine the long-term international migration trends. By so doing, Scenario Ci (incorporating the 2018 MYE and PCU) generates a figure of **921 dpa**. Lichfields considers that this should form the demographic-led OAHN before other uplifts are applied.
- 4.10 Table 4 presents the employment-led scenarios. Scenario Di (**842 dpa**) represents the closest match to GL Hearn’s 790 dpa OAHN figure, which aligns with the Local Plan’s job target of 650 annually. The 52 dpa difference is likely to be due to subtle differences in our underlying assumptions concerning vacancy rates, timeframes, assumptions concerning economic activity rates, commuting ratios, unemployment levels and the incorporation of a higher MYE population starting point in 2018.
- 4.11 Lichfields’ view is that Scenario Ei is also valid, as the PPG states that when assessing housing need, “Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate”³⁰.
- 4.12 Given the very high levels of past job growth in the City, this would generate a need for 829 dpa, rising to **1,062 dpa** when accelerated household formation rates are applied.

³⁰ PPG 2a-019-20140306

Table 4 Key Outputs – Employment-led Scenarios for the City of York, 2017-2033

Scenario	Change in Population	Change in Jobs	Change in Households	Dwellings 2017-2033	
				Total Change	DPA
Scenario D: ELR Scenario 2 Jobs Growth	21,727	10,147	9,801	9,969	623
Scenario Di: ELR Scenario 2 Jobs Growth PCU	21,727	10,147	13,242	13,470	842
Scenario E: Past Trend Job Growth	30,831	16,032	13,041	13,266	829
Scenario Ei: Past Trend Job Growth PCU	30,831	16,032	16,711	16,998	1,062

Source: Lichfields using PopGroup

4.13 To summarise, our view is that the demographic-led OAHN (before further uplifts are applied) for the City of York would equate to the long-term migration Scenario Ci, at **921 dpa**, notwithstanding the considerable uncertainty surrounding Brexit. The 2016-based SNPP appears increasingly out of step with the latest 2018 MYE (which were unavailable to us in our previous representations), and it is considered that in this particular instance it is a reasonable sensitivity to apply.

4.14 As for the employment led scenarios, the level of job growth projected by the ELR Scenario 2 scenarios can be accommodated within the 921 dpa demographic need, although we consider that a case could be made to increase the figure still further, to **1,062 dpa**, to match job growth based on past trends. Furthermore, this latter figure is very similar to the NPPF 2019 standard method LHN figure of 1,069 dpa.

Do Market Signals indicate a need for an upward adjustment to purely demographic-led needs?

4.15 The market indicators assessed in Section 5.0 shows that there are significant imbalances between the demand for and supply of housing in the City of York. This analysis indicates pressure on the housing market, which will not be addressed by providing only for the level of growth produced by the continuation of demographic trends. A response is clearly required through an adjustment to the demographic-based scenarios, in line with the recommendations set out in the Practice Guidance.

Determining a scale of uplift

4.16 By way of setting the initial context, the 2019 HNU recommends a 15% uplift to the demographic starting point of 484 dpa, which results in an OAHN of 557 dpa. However, GL Hearn notes that this is some way short of the economic led need of 790 dpa, which is the housing requirement now identified in the Proposed Modifications to the City of York Local Plan.

4.17 It is noted that although the Local Plan will be examined under the transitional arrangements for the NPPF, the standard method identifies that York would have an **affordability uplift equal to 30% to the 2014-based SNHP**. This is because the Ratio of median house price to median gross annual workplace-based earnings in York was 8.86 in 2018. This is significantly higher than the equivalent affordability ratio for England and Wales, at 7.83 for 2018.

1. Review of National position

4.18 Under the current planning system, addressing affordability across the country will be a key function of implementing a large number of Local Plans either adopted or currently

being prepared. Each area will have a role in contributing to Government's aims as expressed in national planning policy. At the national level, a number of studies have analysed the scale of housing delivery and dwelling stock growth that would be necessary to address affordability problems:

- 1 The Barker Review of Housing Supply (2004)³¹ concluded that to reduce the long-term house price trend to 1.1% per annum (the average across the EU) would require national delivery totalling 245,000 private dwellings per annum to 2026, alongside an increased provision of social sector housing (23,000 p.a.). The Barker Review concluded that such a level would be necessary for *"improving the housing market"* and ensure that *"affordability is increasingly improved over time"* (paras 1.39 and 1.40). Nationally, that scale of growth would represent dwelling stock growth of **c.1.13%** per annum³².
- 2 The National Housing and Planning Advice Unit's (NHPAU) *'Developing a target range for the supply of new homes across England'* (October 2007)³³ concluded that (para 4.68) the *"NHPAU believes that there is a realistic possibility of stabilising the affordability of market housing over the long-term if a supply target for 270,000 net additions to stock, in the right place and of the right type can be adopted through the planning system for delivery before or by 2016."* This would represent a **1.14%** per annum scale of stock growth.
- 3 In July 2016, the House of Lords Select Committee on Economic Affairs published their report *'Building More Homes'*³⁴ which was the output of the House of Lords' inquiry into the housing market. It drew upon evidence provided to the inquiry by HM Treasury (HMT) indicating that *"modelling suggests that in order to keep the house prices to earnings ratio constant, somewhere between 250,000 and 300,000 homes per year need to be built"* in arriving at its ultimate conclusion that, *"to address the housing crisis at least 300,000 new homes are needed annually for the foreseeable future."* (our emphasis). This would represent a **1.26%** per annum scale of stock growth.
- 4 The Redfern Review,³⁵ a 2016 independent review of the causes of falling home ownership and associated housing market challenges, was informed by a housing market model built by Oxford Economics³⁶ which looked at the impacts of different supply assumptions on prices and home ownership. It identified that *"To put downward pressure on prices new supply would need to outstrip underlying household formation"* modelling a boost in housing supply of 100,000 above their baseline forecast of 210,000 dwellings per annum, concluding that 310,000 dpa *"helps to keep prices in check"* up to 2026. This would represent a **1.31%** per annum growth in dwelling stock.

4.19 What each of the above studies have demonstrated is that increasing dwelling stock growth would be necessary to address and improve affordability at the national level. Across the analysis it suggests that, at the national level, stock growth of between 1.1%

³¹ 'Review of Housing Supply, Delivering Stability: Securing our Future Housing Needs' (March 2004), Kate Barker - http://news.bbc.co.uk/1/hi/shared/bsp/hi/pdfs/17_03_04_barker_review.pdf

³² 23,733,000 dwelling stock in England in 2016 (CLG Live Table 100)

³³ 'Developing a target range for the supply of new homes across England' (October 2007), NHPAU - <http://webarchive.nationalarchives.gov.uk/20120919132719/http://www.communities.gov.uk/documents/housing/pdf/523984.pdf>

³⁴ 'Building more homes' 1st Report of Session 2016–17 (15 July 2016) House of Lords Select Committee on Economic Affairs (HL Paper 20) - <http://www.publications.parliament.uk/pa/ld201617/ldselect/ldeconaf/20/20.pdf>

³⁵ 'The Redfern Review into the decline of home ownership' (16 November 2016) - http://www.redfernreview.org/wp-content/uploads/2016/01/TW082_RR_online_PDF.pdf

³⁶ 'Forecasting UK house prices and home ownership' (November 2016) Oxford Economics - <http://www.redfernreview.org/wp-content/uploads/2016/11/20161114-Redfern-Review-modelling-paper.pdf>

and 1.3% per annum could achieve the beneficial impacts on affordability needed (recognising that in local areas this will clearly vary, depending on the local household growth rates). The figures would all represent significant increases above background projected household growth (c.210,000 households p.a. in the CLG 2014-based projections over the period to 2039 is the equivalent to c.215,000 dwellings p.a.) of between 21% and 44%. This gives an indication of the scale of dwelling delivery potentially required to address market signals at the national level.

- 4.20 The above reports show a clear consensus that around 250,000-300,000 homes per year are needed nationally. The Government’s standardised methodology equates to a national total of 266,0000 homes per year (the figure is 300,000 without the 40% ‘cap’), although the methodology includes a caveat allowing authorities to plan for more than the methodology shows, for example if there are economic reasons³⁷.
- 4.21 In the Autumn 2017 Budget, the Chancellor Phillip Hammond MP set out Government aspirations for housebuilding to reach 300,000 per year³⁸. It is clear that at a national level the consensus is that at least 250,000-300,000 homes per year are needed, and this would represent annual growth in the range of 1.1% to 1.3%.
- 4.22 Given that some areas (i.e. with weaker affordability pressures/footnote 6 environmental constraints) would be expected to do less than their ‘share’ of the nationally needed 1.1% to 1.3%, equally areas which are less affordable would be expected to do more than their ‘share’, i.e. more than 1.3%.
- 4.23 York is an area where affordability is worse than nationally (for example, the median quartile resident-based affordability ratio is 8.9, compared to 7.8 for England & Wales, whilst the figure is even more stark for Lower Quartile affordability, with York’s figure, at 9.4, dwarfing the national rate of 7.2). The City of York needs to do more than the national average to address affordability. Table 5 shows the equivalent dwellings per annum under various annual growth rates for York.

Table 5 Growth rate and equivalent dwellings per annum from 2017 to 2033

Growth rate	Dwellings per annum	Growth rate	Dwellings per annum
1.0%	952	1.6%	1,595
1.1%	1,055	1.7%	1,708
1.2%	1,160	1.8%	1,823
1.3%	1,267	1.9%	1,939
1.4%	1,375	2.0%	2,057
1.5%	1,484	2.1%	2,177

Source: Lichfields based on MHCLG Table 125 Dwelling Stock data – 88,280 dwellings in York as at 2017

- 4.24 For additional context, and to consider what scale of growth might “*reasonably be expected to occur*”, the Table below reviews stock growth rates in adopted post-NPPF plans. Even the area with the highest growth rate (Cherwell, at 1.82%) will see this increase further soon, when it reviews its Local Plan to include unmet need from Oxford.

³⁷ See ‘Planning for the Right Homes in the Right Places’ consultation

³⁸ See Autumn Budget at

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/661583/autumn_budget_2017_print.pdf

Table 6 Adopted Housing Targets in post-NPPF Plans

	Adopted Annual Housing Target	Stock 2016	Annual Growth Rate
Cherwell*	1,140(+)	62,402	1.82%
Taunton Deane	850	52,840	1.61%
Milton Keynes	1,750	108,981	1.61%
Swindon	1,625**	94,374	1.72%
East Cambridgeshire	575	36,971	1.56%

Source: Housing targets - respective Local Plans. Stock - DCLG Council Tax Base data. *Figure for Cherwell will increase following Local Plan Review to take account of additional need from Oxford. **Total housing target 2011-2026 22,000 dwellings (1,467 dpa), however Policy SD2 of Local Plan states average annual housing delivery from 2016-2026 will be higher at 1,625 dpa.

2. Affordability Modelling based on University of Reading/OBR assumptions

4.25 The Office for Budget Responsibility [OBR] produced Working Paper No.6 Forecasting House Prices in July 2014. The report identifies the following with regards to future average earnings growth and median house price growth (the components of an affordability ratio) in paragraph 3.12:

“Using some long-run assumptions for real income growth (2.2 per cent a year, including growth in the number of households of 1 per cent a year) and housing supply (keeping pace with the number of households), and assuming the housing discount rate and wage share variable are stationary, the model predicts around 3.3 per cent real house price growth a year in steady state. In addition, assuming consumer price inflation in line with the Bank of England’s 2% target implies 5.3 per cent a year nominal house price growth in steady state.”

4.26 The University of Reading's affordability model found a high price elasticity (-2.0) in relation to increases in stock at regional level in England, implying in-effect that for every 1% increase in supply (with housing supply keeping pace with the household projections), relative prices would be expected to fall by 2%. These assumptions have been combined with the wage/house price growth forecasts in the March 2017 OBR Outlook to model affordability outcomes.

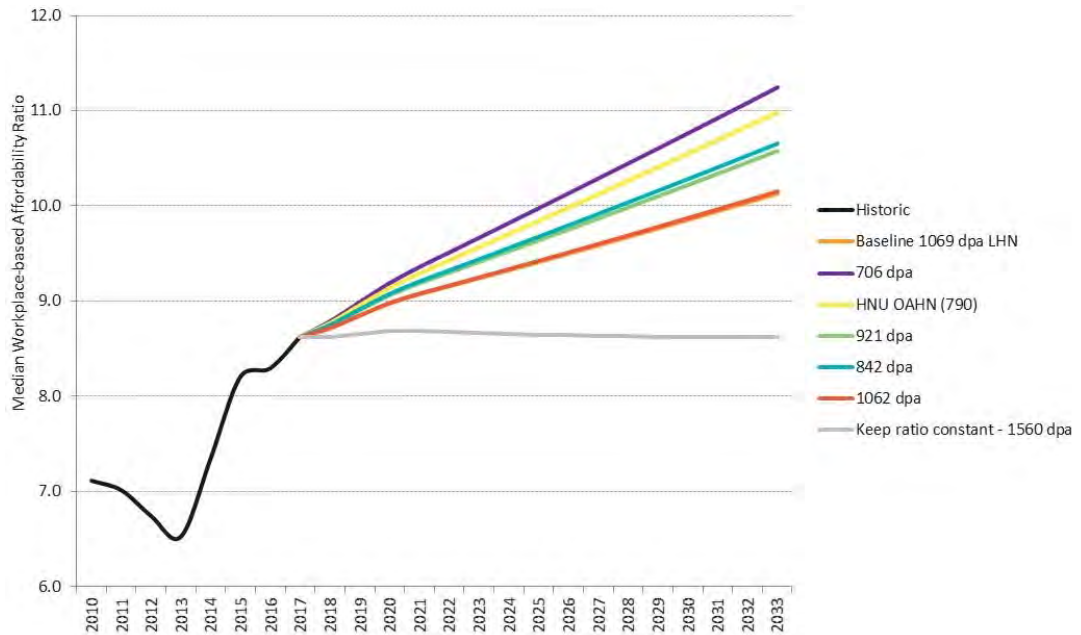
4.27 There are a number of examples elsewhere of where this affordability modelling has informed the scale of market signals uplift applied. In Mid Sussex, the Inspector’s interim conclusions on the housing requirement (published February 2017) concluded that:

- The Council’s 24 dpa uplift for market signals was not sufficient, and although it was similar to approaches elsewhere however there have been changes in circumstances and a new approach is needed (p.2/3);
- House prices and affordability have worsened markedly in recent years, and there is a ‘serious and growing affordability problem’ for those on lower incomes (p.3);
- The approach of comparing a District to its neighbours in terms of market signals is flawed, because if each authority replicated this approach the cycle of worsening affordability would be perpetuated (p.3)
- A significant uplift is needed to improve affordability, and the approach based on OBR/University of Reading has the ‘greatest value’ (p.5);
- An uplift of 20% is well-founded and realistic (p.6).

- 4.28 On 1st February 2018, the Inspector’s Report on the Waverley Local Plan (part 1) Examination was published. In respect of market signals, the Inspector noted that:
- Affordability is particularly poor in Waverley, it is amongst the least affordable area outside London and affordability is worsening (IR 20);
 - The plans requirement, which incorporate a 5% upward adjustment to household formation rates to account for market signals is ‘not capable of addressing the Borough’s serious and worsening problem of housing affordability (IR 21);
 - The OBR/University of Reading approach put forward by representors (which yielded a 28.8% uplift) represents a ‘credible approach’ to modelling supply and affordability. Overall an uplift on the starting point of 25% should be applied (IR 22).

4.29 Applying this approach to York (for illustrative purposes, median workplace-based earnings are shown) suggests that 1,560 dpa would be needed to keep affordability at its 2018 level, as shown in Figure 4. This is set in the context that affordability has evidently worsened very significantly in the last 4 years alone. At the current HNU OAHN of 790 dpa, affordability would continue to worsen to around 11.0 by the end of the plan period.

Figure 4 Historic and forecast change in Median workplace-based affordability ratio



Source: ONS, Lichfields based on OBR/University of Reading/ONS

4.30 Table 7 shows the impacts on median workplace-based affordability in the short and long term. It demonstrates a significant worsening at the HNU’s current OAHN, and a clear improvement which directly relates to the scale of housing growth. A level of around 1,560 dpa would be sufficient to maintain affordability in the longer term.

Table 7 Impact of scales of housing growth on affordability

Dwellings per annum	Median, workplace-based		
	2017 ratio	Ratio in 2025	Ratio in 2033
(HNU OAHN) 790 dpa	8.62	9.8	11.0
Scenario Bii: 2016-based SNPP PCU/MYE (706 dpa)		10.0	11.2
Scenario Ci: Long Term Migration PCU (921 dpa)		9.6	10.6
Scenario Di: ELR Scenario 2 (842 dpa)		9.7	10.7
Scenario Ei: Past Trends Job growth (1,062 dpa)		9.4	10.1
Level required to keep current (2017) affordability ratio constant (1,560 dpa)		8.6	8.6

Source: Lichfields based on OBR/University of Reading/ONS

- 4.31 This exercise provides two useful conclusions in assessing what scale of uplift might be needed in York:
- 1 The HNU’s OAHN would clearly be insufficient to bring about any improvement whatsoever in affordability, and affordability would likely worsen significantly in the short and long term; and
 - 2 Up to 1,560 dpa would be needed just to maintain affordability at its 2017 (which is the highest level seen in York), and arguably this should be treated as a minimum given affordability has worsened significantly in the last few years alone.

3. Apportionment of national needs

- 4.32 The City of York is relatively worse in respect of affordability than the national equivalent. All other things being equal, to improve affordability across the country, the City of York and its HMA peers would need to make a proportionately greater uplift than those where affordability issues are less acute. This exercise has been undertaken on the basis that Government now has a clear aim to bring housebuilding to a level of 300,000 per year by the mid-2020s, as set out in the Autumn 2017 budget³⁸ (a level which is consistent with much of the literature review considered earlier in this section). This national total equates to an uplift of 85,000 on the 2016-based household projections (which suggest a need for c. 215,000 homes per annum).

- 4.33 It is possible to consider how this required uplift should be shared between 320+ Local Planning Authorities across the country in order to seek to hold the affordability ratio (at least at a national level) constant. Three alternative scenarios for market signals uplifts across the country have been modelled, as follows:

- 1 Each district with an affordability ratio above the national ratio makes a market signals uplift in proportion to its difference with the national figure;
- 2 Each district with an affordability ratio above the national ratio makes a market signals uplift in proportion to its difference with the national figure (weighted 50%) and its projected household growth (weighted 50%); and
- 3 Every district (whether above or below the national ratio) makes a market signals uplift in proportion to its difference with the lowest affordability ratio, in Copeland at 2.6, (weighted 50%) and its projected household growth (weighted 50%).

- 4.34 The results for the City of York under these methods is shown in Table 8. The uplift has been based on a demographic baseline of 18,000 dpa, based on the projections plus a

vacancy rate. To meet a national figure of 300,000 per annum the scale of uplift would need to be 20% at least, although taking into account the City of York’s relative size this could be as high as 30%.

Table 8 Outcomes for the City of York- Apportionment of National Needs

	National total of 300,000		
	Share of 85,000 uplift	Dwellings	Uplift (to 921 dpa)
Method 1	0.22%	189	20%
Method 2	0.21%	182	20%
Method 3	0.33%	278	30%

Source: Lichfields based on ONS/DCLG

4.35 The analysis clearly shows that an uplift well in excess of the 15% put forward in the HNU would be needed to reasonable expect an improvement in affordability in the City of York, and for the City to be contributing to the need nationally for new homes, taking into account affordability and its size. It is notable that using a 300,000 per annum total, the uplift for York identified in the Government’s standardised methodology – at 30.4% - falls at the very upper end of the range (20%-30%) identified through this exercise.

Summary

4.36 In light of the above analysis, there is a case to be made that at the very least, the market signals uplift for the City of York should be a minimum of 20%. Taking a demographic-led baseline of 921 dpa based on the latest projections, this would equate to 1,105 dpa. OBR modelling suggests that an uplift even greater than this may be needed to improve affordability, however in light of stock growth elsewhere and the outcomes of method (3), a minimum of **20%** is considered appropriate.

4.37 This clearly underlines the failure of the HNU to adequately meet the PPG requirement to set its uplift at a level that is related to the problems of affordability or that could be expected to improve affordability; indeed, the HNU fails to approach this question at all.

4.38 **When applied to Scenario Ci (921 dpa), this results in a need for 1,105 dpa.**

Are Economic Growth Needs Being Addressed?

4.39 The Practice Guidance requires plan-makers to assess likely employment growth based on past trends and/or economic forecasts. Where the labour force supply is projected to be less than the forecast job growth, the Practice Guidance states that this could result in unsustainable commuting patterns which could potentially reduce the resilience of local businesses.

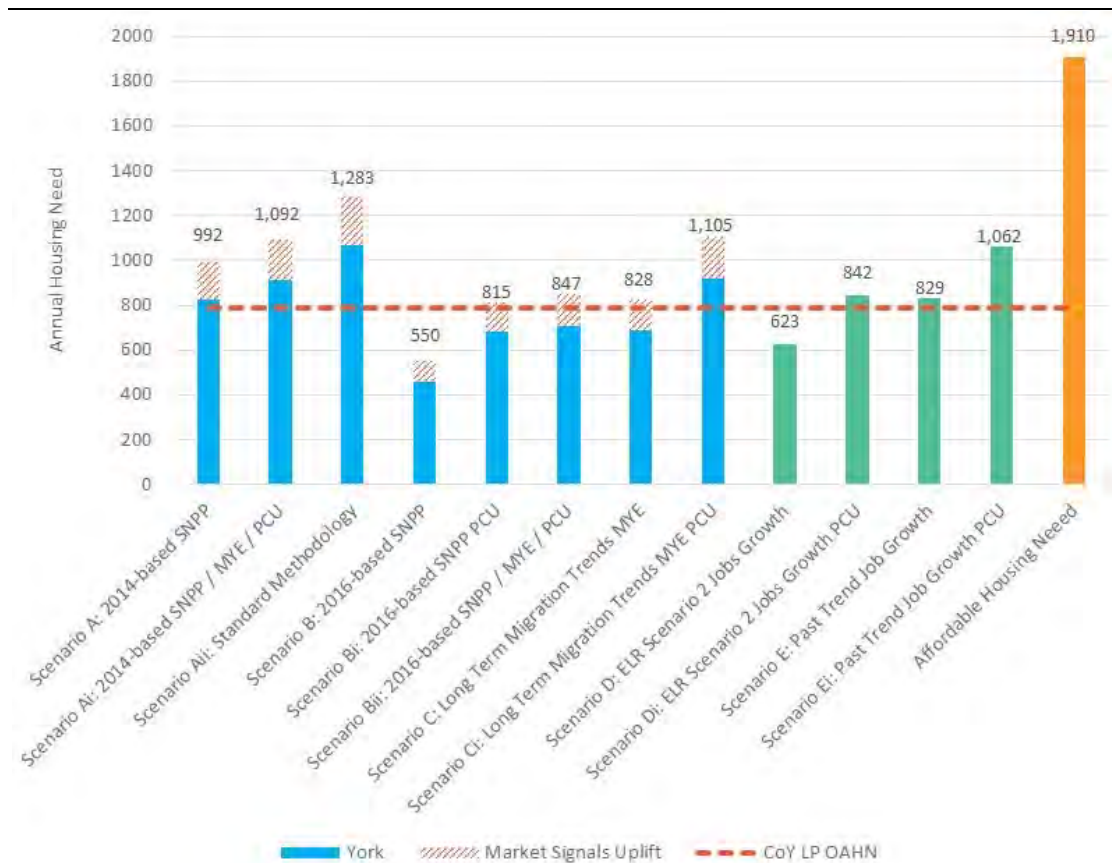
4.40 A number of scenarios have been modelled to demonstrate the impact of a range of likely growth scenarios based on existing trends, forecasts and economic strategies. These scenarios also show the scale of change that would be required if demographic trends were to be reversed.

4.41 The economic forecasts for York indicate that, factoring in accelerated household formation rates, the employment-led figures range from 861 dpa based on the ELR Scenario 2’s 650 annual job growth (842 dpa) to 1,062 dpa based on past trends. These are all lower than the level of housing need associated with the uplifted demographic scenario as set out above.

4.42 The implication of this analysis is to demonstrate that the demographic-based projections would support a reasonable level of employment growth, and that no upward adjustment is required to the demographic-based housing need figures to ensure that the needs of the local economy can be met. Conversely, it is important to recognise that the past trends job growth scenario (Ei) generates a level of housing need that is only marginally lower than the demographically-led starting point (Scenario Ci after an adjustment is made for market signals) of 1,105 dpa. Therefore, the OAHN cannot be any less than this as it would not meet the most appropriate employment-led scenario.

4.43 Figure 5 sets out the annual dwelling need under each scenario as identified by Lichfields' modelling work.

Figure 5 Model Outputs for the City of York: Dwellings per Annum 2017-2033



Source: Lichfields Analysis
 Note: The orange boxes on the blue bars relate to the recommended uplift to address worsening market signals

Is there a need to increase housing supply to aid the delivery of affordable housing?

4.44 The Practice Guidance makes clear that the consideration of an uplift in response to market signals and any adjustment to take account of affordable housing need should be undertaken as two discrete stages. The Practice Guidance³⁹ identifies six relevant market signals that are to be considered. Not one of these relates to affordable housing need, i.e. the specific need of those households who lack access to suitable housing (both now and

³⁹ ID 2a-019-20140306

in the future). The assessment of market signals therefore does not include a consideration of affordable housing need. However, affordable housing needs must still be taken into account when determining OAHN.

4.45 Following the discussion on market signals, the Practice Guidance provides an overview of how affordable housing needs are to be assessed. The section closes by stating that:

“An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes”⁴⁰.

4.46 In this regard, and as noted above, the SHMA Update (September 2017) has identified an affordable housing need of 573 dpa. Assuming an optimistic 30% delivery requirement, this would result in need for 1,910 dpa.

4.47 GL Hearn has not allowed for any adjustment to the identified housing need to reflect this level of affordable housing need. We consider that this is a serious misjudgement.

4.48 Lichfields does not consider that it is adequate just to suggest that an uplift for market signals would be sufficient to address affordable housing need. Such an approach is contrary to the Satnam Millennium, Oadby and Wigston and Kings Lynn judgments, all of which require an additional uplift (i.e. as distinct to the market signal adjustment). It also fails to reflect the requirements of the Framework [§47] and the Practice Guidance which clearly show the uplift for market signals to be separate to the adjustment for affordable housing.

4.49 In order to meet the identified level of affordable housing need in full, the bottom end of the range would need to be higher (although it is recognised that at 1,105 dpa, over half of the City’s affordable housing need would be met). The approach of Dove J at Kings Lynn informed the recommendation of LPEG to apply a specific level of uplift in response to identified housing need. Whilst the implication of the Kings Lynn HCJ is that Local Plans are not required to meet their affordable housing needs in full, in this instance, **an uplift of the OAHN by a further 10%, from 1,105 dpa to 1,215 dpa would, in theory, go a meaningful way to ensuring that this can be achieved (based on a 30% delivery rate).**

⁴⁰ ID 2a-029-20140306

5.0 Integration of Student Housing Needs

5.1 It is important to note that the household projections upon which York’s OAHN is based relate to C3 uses only, and not C2. Specifically, and of particular relevance to the City of York, CLG’s household projections do not include an allowance for students who might be expected to reside in Halls of Residence (termed, along with people living in nursing homes, military barracks and prisons, as the ‘Communal establishment population’).

5.2 As summarised by CLG in its *2014-based household projections Methodological Report* (July 2016), the household projections are based on the projected household population rather than the total population. The difference between the two is the population in communal establishments, also termed the ‘institutional’ population. This population comprises all people not living in private households and specifically excludes students living in halls of residence:

“The institutional population is subtracted from the total resident population projections by age, sex and marital status to leave the private household population, split by sex, age and marital status in the years required for household projections.” [page 12]

5.3 This is important for the City of York, because it means that if the household projections are used as the basis for calculating the OAHN (which GL Hearn’s methodology does), it specifically excludes a substantial proportion of specialised student accommodation needs.

5.4 In this regard, it is worth noting that in March 2017 GL Hearn published an addendum to the West Surrey SHMA for Guildford Borough Council⁴¹. In that document, GL Hearn recommended an adjustment of an extra 23 dpa be added to the OAHN of 539 dpa based on an analysis of future student numbers and accommodation need in the Borough.

5.5 According to the GL Hearn’s Guildford analysis, there are three things necessary to consider when determining whether there is a need to adjust the objectively assessed housing need to take account of student growth:

- How the student population at University of Surrey is expected to change over the plan period;
- What growth in typical student age groups is expected within the population projections, on the basis that the CLG Household Projections model is not assuming growth in numbers in institutions;
- The number/ proportion of students which can be expected to require housing within Guildford, and of these what proportion might be expected to be accommodated in halls of residence rather than the wider housing stock.

5.6 This was accepted in the Inspector’s Report dated 27th March 2019, resulting in a new OAHN of 562 dpa. The Inspector concluded that:

“From the figure of 539 dpa resulting from the assessment of jobs-led economic growth, the Council have made a further adjustment of 23 dpa for the growth of the student population based on analysis carried out in the SHMA addendum. Taking the University of Surrey’s known aspirations for growth, it is estimated that the number of full-time Guildford-based students at the University will increase by 3,800 between 2015-34, resulting in additional migration to Guildford. Assuming that 45% would be accommodated in the wider housing market, and on the basis of

⁴¹ GL Hearn (2017): West Surrey Strategic Housing market assessment: Guildford Addendum Report 2017

an average 4 students per household, the SHMA Addendum calculates that this would equate to growth of 23 additional dwellings per annum. It has been argued that the 18 to 23 age group in the most recent population projections and mid-year estimates includes students; but this cannot be assumed to be the case, and by its nature Guildford is likely to be attractive to young people whether or not they are students. It is a sound step to add this allowance for students when considering the overall housing requirement, to ensure that there is not a significant incursion of students into the housing market which would diminish the supply available to others needing housing in the area.”

- 5.7 Given that York has a disproportionately high student population following the ongoing success of the University of York, York St John University, Askham Bryan College of Agriculture and Horticulture and the landmark campus development of York College, it is surprising that GL Hearn did not follow a similar exercise to the one they undertook for Guildford Borough Council.
- 5.8 Using data and assumptions gathered from the University of York, York St John’s University and the City of York Council’s own analysis (*Housing Requirements in York*, produced on its behalf by Arup in 2015) we can make a broad assessment of the housing needs of students in the City of York.
- 5.9 Table 9 presents the past four years of student headcount data for the University of York and York St John University. Over this period the total student headcount grew by 7.2% overall. However, whilst the University of York [UoY] grew its student population by 15.4%, York St John’s University [YSJ] lost 4.7% of its students.
- 5.10 Both universities experienced an expansion in full-time students but a contraction of part-time students. The University of York gained 2,300 full-time students (15.4%) but lost 315 part-time students (-16.4%), whilst York St John’s University gained 235 full-time students (4.3%) but lost more than half of its part-time students.

Table 9 Recent trends in University student headcounts in York 2014/15-2017/18

	2014/15	2015/16	2016/17	2017/18	% Change
The University of York	16,835	17,150	17,895	18,820	11.8%
Full-time	14,920	15,210	16,280	17,220	15.4%
Part-time	1,915	1,940	1,615	1,600	-16.4%
York St John University	6,555	5,975	5,940	6,250	-4.7%
Full-time	5,495	5,180	5,355	5,730	4.3%
Part-time	1,060	795	585	520	-50.9%
Total Full Time	20,415	20,390	21,635	22,950	12.42%
Total Part Time	2,975	2,735	2,200	2,120	-28.74%
Total Students	23,390	23,125	23,835	25,070	7.18%

Source: HESA HE student enrolments by HE provider 2014/15 to 2017/18

- 5.11 For the purposes of this analysis, only full-time students are considered to be part of the additional student population in York living in C2 housing, as part-time students are more likely to be residents already living in York or commuting into the City.
- 5.12 The City of York Council’s 2015 *Housing Requirements Study* assumed (in Appendix B)⁴² that, following consultation with both Universities, 5% of all UoY students live at home or

⁴² Arup (2015): Evidence on Housing Requirements in York: 2015 update, Appendix B

commute into York, whilst 20% of all YSJ students do the same. The 20% figure for YSJ has recently been reiterated in the University’s 2026 strategy, where it is stated that the University aspires to grow to 10,000 students by 2026, with 8,000 of those being “on campus”⁴³. This would be an increase of **3,750** students on the current figure of 6,250.

- 5.13 Applying these assumptions to the 2017/18 total full-time student figure of 22,950 generates a student baseline figure of **20,943** students requiring accommodation within the City (i.e. 95% of UoY’s 17,220 FT students, plus 80% of YSJU’s 5,730 FT students).

Expected Growth in Student Numbers

- 5.14 In a representation submitted to the draft York Local Plan examination in March 2018⁴⁴, the University of York’s planning agents (O’Neill Associates) set out potential growth scenarios for the university up to 2038. Of the six growth scenarios, Scenario 3, which assumed 1.25% student growth p.a. to 2038, and Scenario 4, which assumed 1.5% growth p.a. to 2038 were considered by O’Neill Associates to be “*the minimum prudent scenarios for planning purposes at this stage of the Local Plan*”. Scenario 5, which assumed 2% growth p.a., was also considered to be “*a realistic possibility given it is at a rate equal to half the growth the University has achieved over the last 10 years.*”
- 5.15 The growth scenarios modelled by O’Neill Associates were based on full-time-equivalent [FTE] students and was modelled forward from 2016/17 data. The University of York has since released FTE student data for 2017/18 and 2018/19. Given that growth in FTE students in the past two years has been 4.1% and 3.2% respectively, we have assumed the higher Scenario 5 growth rate of **2% p.a.** over the full Plan period to 2033 is justified for use in this analysis. This equates to a growth of **6,069** on the 2016/17 FT student figure of 16,280.
- 5.16 As set out above, the YSJU 2026 Strategy document (2019) sets out that University’s ambition to grow to 10,000 students by 2026, a growth of 3,750 students from 6,250 in 2017/18 over an eight-year period. Using the average proportion of full-time students at the University from the past four years of HESA data (totalling 88% of all students), this suggests it would be reasonable to work on the basis that 8,800 full-time students will be attending YSJU by 2026, an increase of **3,070 full-time students over eight years**, or 384 students per year until 2025/26.
- 5.17 After 2025/26 we have no data regarding YSJU’s growth plans, so for the purposes of this analysis we have fixed the full-time student number at 8,800 for the remainder of the plan period to 2033 (i.e. zero growth post 2026).
- 5.18 Based on the above assumptions, the expected growth in full-time students over the 16-year Local Plan period 2016/17 – 2032/33 equates to **6,069** for the UoY and **3,445** for York St John (this latter figure includes one years’ growth already documented in Table 9 above, of 375 students between 2016/17 and 2017/18). This totals **9,514** additional FT students based at the two Universities over the 16-year plan period 2016/17 – 2032/33.
- 5.19 Applying the previous assumptions relating to students living at home or commuting to this generates an additional **8,522** full-time students living in York (i.e. 95% of UoY’s 6,069 FT students and 80% of YSJ’s 3,445 FT students).

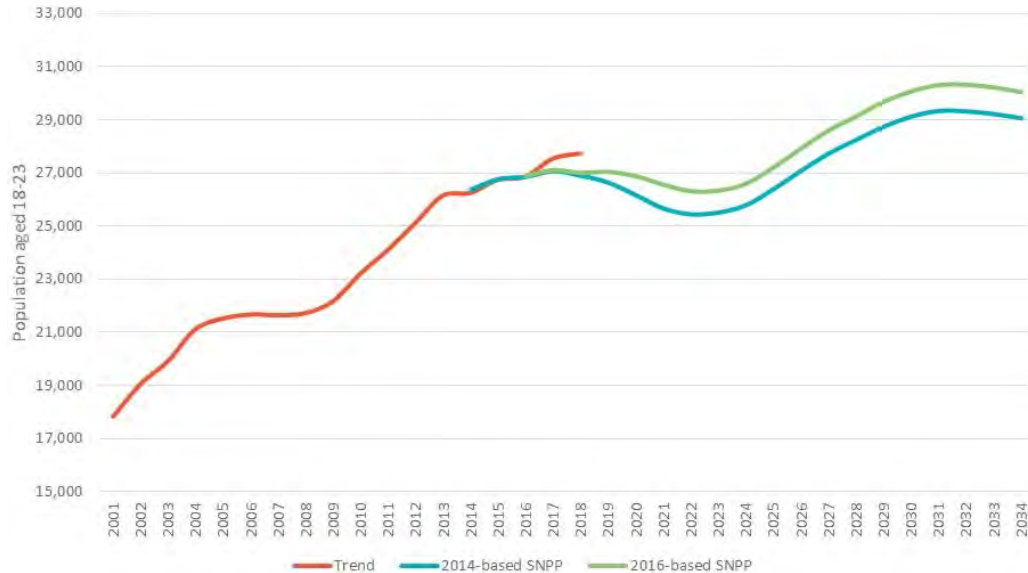
⁴³ York St John University (2019): *2026 Strategy: Make the Possible Happen*, page 26

⁴⁴ O’Neill’s Associates Submission to York Local Plan (2018): *University of York – Growth Rationale for Campus east Extension to the South of the Lake*, page 5

Student Growth within the Demographic Projections

- 5.20 It is reasonable to assume that the 18-23 age cohort will represent the core student age group, particularly for under graduates. This was also the approach GL Hearn followed in its Guildford SHMA Update. Figure 6 illustrates that using either the 2014-based SNPP or the 2016-based SNPP, there is limited growth within this age cohort, particularly over the short to medium term, with growth principally occurring from 2025 onwards. Indeed, from 2017 to 2022, the number of residents in this age group is expected to fall by 1,631 in the 2014-based SNPP, and by 798 residents in the 2016-based SNPP.
- 5.21 Over the 16-year plan period 2016/17 to 2032/33, the projected growth of this age cohort is 3,118 residents (+12%) according to the 2016-based SNPP, or 2,149 (8%) using the 2014-based equivalents. In contrast, the number of full-time students attending the two Universities in York is expected to rise by 9,514 over the same time period, of whom 8,522 are expected to live in the City, an increase of **36% on the 2016/17 figure of 32,357** attending the two York Universities. This represents a rate of growth significantly higher than that of the age cohort in the projections.

Figure 6 Past and Projected Population Growth in York for residents aged 18-23



Source: ONS Mid-Year Population Estimates 2019/2014-based SNPP/2016-based SNPP

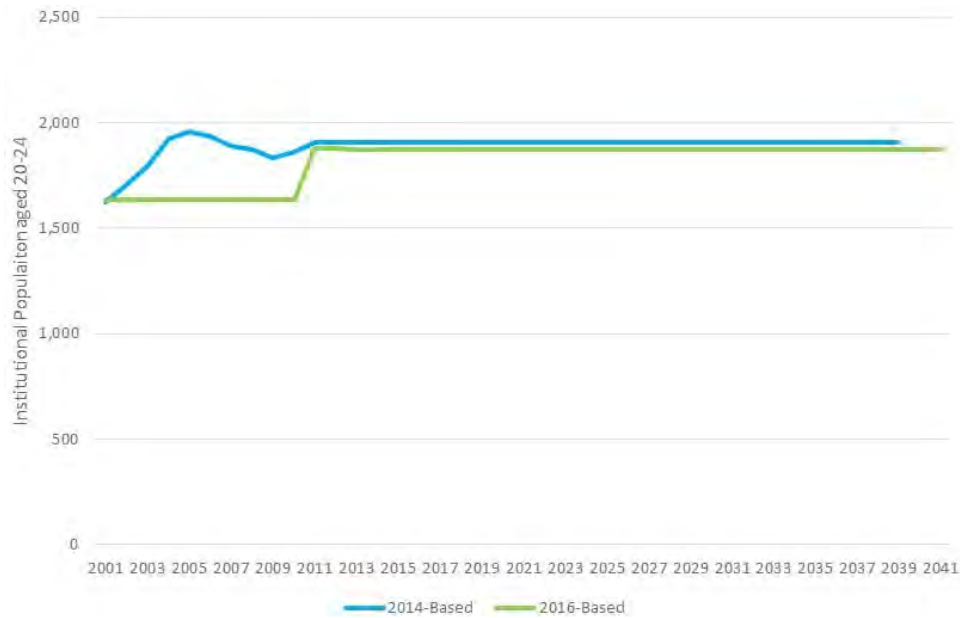
- 5.22 The Figure above includes growth in new student residents and also existing residents who are not in Higher Education. In an attempt to separate out the anticipated growth in students alone in the projections, Figure 7 presents the growth of residents aged 20-24⁴⁵ living in communal establishments in the City of York up to 2039/41. Communal establishments include institutional accommodation such as residential care homes, army barracks, correctional facilities and (of particular relevancy for younger age groups) purpose-built student accommodation (i.e. halls of residence). It is therefore highly likely that most of the population aged 20-24 living in communal establishments can be considered to be students living in purpose-built C2 student accommodation. The data indicates that post 2017, the number of residents aged 20-24 living in communal establishments is anticipated to stay constant, at 1,909 residents in the 2014-based SNPP,

⁴⁵ The ONS / CLG data is grouped together in 5-year age cohorts including 20-24 and not 18-23 year olds; however, it is reasonable to assume that the trends exhibited for this slightly older age group represents a reasonable proxy for student growth

and 1,879 in the 2016-based SNPP. There is therefore no change in the size of this cohort built into either set of projections over the plan period, and so growth in the numbers of students living in purpose-built accommodation clearly play no part in the ONS's anticipated population growth for York residents shown in Figure 6.

- 5.23 From this, it could also be reasonably inferred that the ONS projections have not factored in the strong growth in student numbers at the 2 Universities into their projections, whether they are likely to be living in C2 student accommodation or renting in the private market. Furthermore, the projections suggest a lack of growth in the short-term, whilst growth effects later in the plan period are likely to be largely accounted for by a cohort effect rather than an increase in student migration.

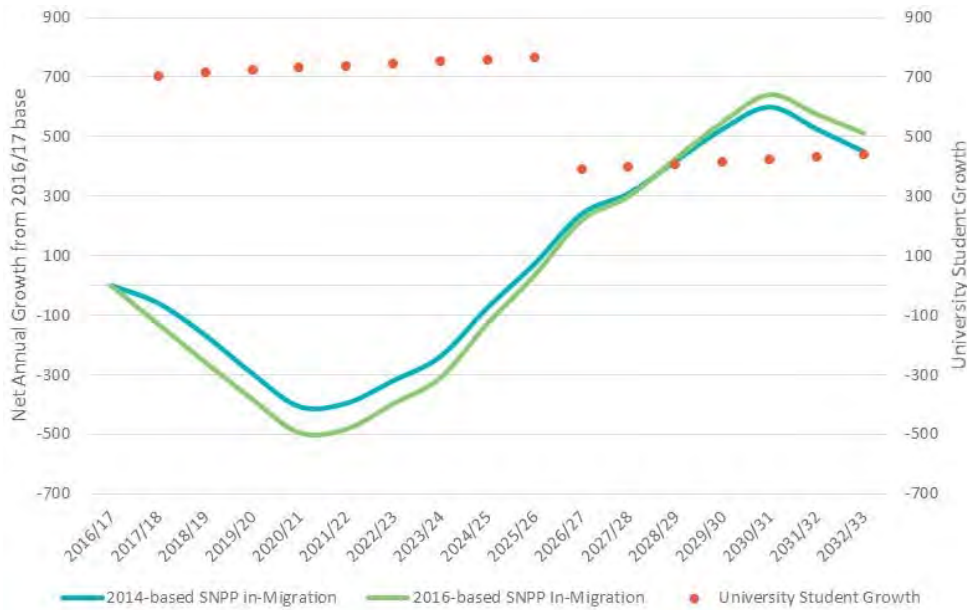
Figure 7 Communal establishment population in York, aged 18-23, 2001-2035



Source: CLG 2014-based SNHP/ ONS 2016-based SNHP

- 5.24 The levels of in-migration of 18-23 year olds into York shown in Figure 8 further support this conclusion. Both projections show a clear decline up to 2025/16 compared to 2017 levels, followed by gradual growth to 2031, whereupon the numbers of domestic in-migrants to the City of York start to decline once more. This is in stark contrast to the expected net increase in Full Time student numbers in the two main Universities, where the main growth is in the first few years of the Plan period, suggesting that they are not adequately reflected in the projections.

Figure 8 Internal and cross-border migration for ages 18-23 migration into York 2017-2041 vs. Anticipated Growth in University Students



Source: ONS 2014-based SNPP/2016-based SNPP / Lichfields Analysis

5.25 Based on this analysis it is reasonable to assume that the rise in the student population would result in additional housing need over and above the need as determined by the 2016-based SNPP in isolation.

Additional Student Accommodation Needs

5.26 In GL Hearn’s 2017 Guildford analysis, 45% of new students were expected to be living in the private rental sector [PRS], based upon the University of West Surrey’s aspiration to house 50%-60% of its students within student accommodation.

5.27 Appendix B in The City of York Council’s 2015 *Housing Requirements Study*⁴⁶ includes an analysis of the proportion of both universities’ students that are living in the PRS between 2010/11 and 2017/18. Over this period the average proportion of students living in the PRS was 56.6% of the total. This figure includes the assumptions relating to students living at home or commuting, and so must be applied to the total additional number of FT students, not just those living in York.

5.28 Applying this assumption to the combined university full-time student growth figure of 9,514 generates an estimated **5,385** additional full-time students likely to be living in the wider housing stock in York over the 16-year plan period, or **337** additional students per year.

5.29 On the basis of an average of 4 students per household (an assumption that was also used by GL Hearn in 2017⁴⁷), this equates to around **1,346** dwellings over the 15-year plan period; an average of **84 dpa** over the plan period 2016/17 - 2032/33.

⁴⁶ Arup (2015): Evidence on Housing Requirements in York: 2015 update, Appendix B

⁴⁷ GL Hearn (2017): West Surrey Strategic Housing market assessment: Guildford Addendum Report 2017

Table 10 Additional student population requiring PRS dwellings in York 2016/17-2032/33

Measure	Total
Additional FT students	9,514
Additional FT students living in York	8,522
Additional FT students living in PRS in York	5,385
Additional dwellings needed	1,346
Additional dwellings needed p.a.	84

Source: Lichfields analysis

Conclusion

5.30

Based on this analysis, it cannot be assumed that the growth in the 18-23 age cohort in the latest population projections includes growth in student numbers, and therefore that there is adequate provision for new student housing within the OAHN. Following this, **it is our recommendation that an additional 84 dpa be factored into the City of York’s OAHN.**

6.0 Factoring in the Backlog

- 6.1 The Explanation to Policy SS1 of the Proposed Modifications to the City of York Local Plan states that “*Following consideration of the outcomes of this work, the Council aims to meet an objectively assessed housing need of 790 new dwellings per annum for the plan period to 2032/33, including any shortfall in housing provision against this need from the period 2012 to 2017, and for the post plan period to 2037/38.*” [paragraph 3.3]
- 6.2 According to PM21a of that document, *the Update to Table 52: Housing Trajectory to 2033 to reflect the revised OAN of 790 dpa*, this shortfall to housing provision equates to 32 dwellings annually between 2017/18 to 2032/33, or 512 dwellings in total over the 16-year Plan period.
- 6.3 Based on the Council’s *Full Year Housing Monitoring Update for Monitoring Year 2018/19* Table 6, this appears to be based on a net dwelling gain of 3,432 dwellings between 2012/13 and 2016/17, against a requirement of 3,950 (790 x 5); therefore a 518 shortfall, or 32 annually.
- 6.4 The Companies have serious concerns regarding the accuracy of this calculation. It appears that the CoYC have included a very substantial amount of C2 student accommodation in these figures, thus reducing the amount of shortfall they include in the annual housing target.
- 6.5 The Housing Monitoring reports produced by the Council seek to legitimise this approach by referring to the PPG, which states that:
- “All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market...*
- To establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of students living in student only households, using the published census data. This should be applied to both communal establishments and to multi bedroom self-contained student flats. Studio flats in mixed developments designed for students, graduates or young professionals should be counted as individual completions. A studio flat is a one-room apartment with kitchen facilities and a separate bathroom that full functions as an independent dwelling”.*⁴⁸
- 6.6 Setting to one side the fact that the household projections which GL Hearn has used to underpin its demographic modelling do not take full account of the needs of students, we are concerned that the Council’s approach is over-emphasising the contribution this source of accommodation is making to housing delivery.
- 6.7 For example, MHCLG publishes Table LT122 annually for every district in the country, which provides a robust and consistent indication of net additional dwellings. This is based on Housing Flows Reconciliation data that have been submitted by CoYC to MHCL annually.

⁴⁸ ID-3-042-20180913

Table 11 Rate of net housing delivery in York, 2012/13-2016/17

Year	MHCLG Net Housing Completions (LT122)	Housing Delivery Test	Council's Local Plan Estimate	
			Net Dwelling Gain	+/-
2012/13	88	n/a	482	+394
2013/14	69	n/a	345	+276
2014/15	284	n/a	507	+223
2015/16	691	691	1,121	+430
2016/17	378	378	977	+599
Total	1,510	-	3,432	+1,922

Sources: MHCLG LT122, Housing Delivery Test Results 2019, CoYC Full Year Housing Monitoring Update for Monitoring Year 2018/19 Table 6

*Difference from HDT figure

- 6.8 To take an example for the year 2015/16, the Council has included an additional 579 units relating to two 'Off campus privately managed student accommodation sites'. The CoYC's Housing Monitoring Update for that year indicates that this includes 579 units on 2 developments, the Yorkshire Evening Press 76-86 Walmgate, for 361 units; and the Former Citroen Garage, 32 Lawrence Street.
- 6.9 Reference to the latter development (planning application reference 13/01916/FULM) indicates that not all of these units are self-contained under the MHCLG's definition:
- "The new managed student accommodation will create 58 student flats (5 and 6 person flats with communal kitchen/living/dining facilities) and 303 self-contained 'studio' flats along with a management suite (office, common rooms etc.), laundry and other ancillary facilities."*⁴⁹
- 6.10 Therefore, as a best case, this site should be contributing a maximum of 315 units (58/5 + 303), not 361 units – a difference of 46 units.
- 6.11 Similarly, the other student development included for 2015/16 on the former Citroen Garage (15/012440/FULM), also includes shared and self-contained flats:
- "The rooms therefore take a variety of forms self-contained or with shared facilities according to circumstances, to respect the heritage constraints and make the most of the accommodation."*⁵⁰
- 6.12 There are also other inconsistencies with the MHCLG's data; so, for example in the CoYC's 2016/17 Housing Land Monitoring Report Update, Table 3 indicates that 977 housing completions were delivered net, compared to just 378 recorded by MHCLG – a **difference of 599 units**. Yet only a proportion of this difference can be explained by the C2 student accommodation, as only 152 units are attributed to this source in Table 3, compared to 571 units from residential use class C3 approvals, plus 252 from relaxed Permitted Development Rights. It is unclear why the MHCLG's figures are so different to the Council's, given that they are both supposed to have been provided by CoYC Officers.
- 6.13 To be robust, it is considered that the MHCLG's figures should be used. As summarised in Table 12, if the Council's OAHN of 790 dpa is applied, the City of York has under-delivered a total of 2,440 dwellings over the past 5 years. Annualised over the 16 years of the Local Plan, this would require an additional 153 dpa. If Lichfields' higher OAHN of 1,215 dpa is applied, this would generate a huge shortfall of 4,565 dwellings, or 285 dpa over the remaining 16 years of the Local Plan.

⁴⁹ Design and Access Statement for Walmgate Student Castle Development, ref: 13/01916/FULM, paragraph 8.02

⁵⁰ Design and Access Statement for St Lawrence WMC, ref: 15/02440/FULM, paragraph 6.2.2

Table 12 Rate of net housing delivery in York against possible policy benchmarks, 2012/13-2016/17

Year	Net Housing Completions	Council's OAHN (790 dpa)		Lichfields' OAHN	
		'Need'	+/-	'Need'	+/-
2012/13	88	790	-702	1,215	-1,127
2013/14	69	790	-721	1,215	-1,146
2014/15	284	790	-506	1,215	-931
2015/16	691	790	-99	1,215	-524
2016/17	378	790	-412	1,215	-837
Total	1,510	3,950	-2,440	6,075	-4,565
Annualised over 16 years	94 dpa	247 dpa	-153 dpa	380 dpa	-285 dpa

Source: MHCLG LT122

7.0

Conclusions on the City of York's Housing Need

7.1

The Council's approach to identifying an assessed need of 790 dpa in the HNU is fundamentally flawed. There are a number of significant deficiencies in the HNU which means that it is not soundly based. The scale of objectively assessed need is a judgement and the different scenarios and outcomes set out within this report provide alternative levels of housing growth for the City of York. Lichfields considers these to be as follows:

- 1 **Demographic Baseline:** The 2016-based household projections indicate a net household growth of 458 dpa between 2017 and 2033 (including a suitable allowance for vacant/second homes. Once a suitable adjustment has been made to rebase the projections to the (slightly higher) 2017 and 2018 MYEs, and through the application of accelerated headship rates amongst younger age cohorts, takes the demographic starting point to 706 dpa. However, an analysis of the MYE estimates has raised significant concerns regarding the robustness of the international migration statistics underpinning the 2016-based SNPP. Applying long term trends to international migration levels into York, which are more in line with net migration into the City, this would increase the demographic starting point to **921 dpa**.
- 2 **Market Signals Adjustment:** GL Hearn's uplift is 15%. However, for the reasons set out above, Lichfields considers that a greater uplift of at least 20% would be more appropriate in this instance. When applied to the 921 dpa re-based demographic starting point, this would indicate a need for **1,105 dpa**.
- 3 **Employment growth alignment:** The demographic-based projections would support a reasonable level of employment growth at levels above that forecast by the ELR Scenario 2 (which has informed the Local Plan) and past trends. As such, no upward adjustment is required to the demographic-based housing need figure of 1,105 dpa to ensure that the needs of the local economy can be met;
- 4 **Affordable Housing Need:** The scale of affordable housing needs, when considered as a proportion of market housing delivery, implies higher levels of need well above 1,105 dpa. It is considered that to meet affordable housing needs in full (573 dpa), the OAHN range should be adjusted to 1,910 dpa @30% of overall delivery. It is, however, recognised that this level of delivery is likely to be unachievable for York. Given the significant affordable housing need identified in City of York Lichfields considers that a further 10% uplift would be appropriate in this instance and should be applied to the OAHN, resulting in a figure of **1,215 dpa**.
- 5 **Student Housing Needs:** household projections explicitly exclude the housing needs of students living in communal establishments. Furthermore, Lichfields' critique of the projections clearly indicates that they do not adequately reflect the Universities' student growth targets. It is calculated that meeting these growth needs would equate to around 1,346 dwellings over the 16-year Plan period, at an average of 84 dpa on top of the 1,215 dpa set out above (i.e. 1,299 dpa).
- 6 **Rounded, this equates to an OAHN of 1,300 dpa between 2017 and 2033 for the City of York.** This is **22% higher** than the MHCLG standard methodology figure of 1,069 dpa
- 7 **Shortfall of housing delivery 2012-2017:** The Council is also making provision for past under-delivery between 2012 and 2017. Lichfields has serious concerns about how the CoYC have calculated past housing delivery. Based on GL Hearn's OAHN of 790 dpa, and applying the MHCLG delivery figures, this suggests that an

additional 153 dpa should be added on to the OAHN over the course of the 2017-2033 Plan period to address the backlog in full. If Lichfield’s higher OAHN of 1,300 dpa is applied, this would result in a figure of **285 dpa** to be factored on top.

7.2 This allows for the improvement of negatively performing market signals through the provision of additional supply, as well as helping to meet affordable housing needs and supporting economic growth. Using this figure (of 1,300 dpa plus the unmet need 2012-2017) would ensure compliance with the Framework by significantly boosting the supply of housing. It would also reflect the Framework, which seeks to ensure the planning system does everything it can to support sustainable development.

7.3 This process is summarised in Table 13.

Table 13 Approach to OAN for the City of York 2017-2033

	Dwellings per annum (2017-2033)
Demographic Starting Point (2016-based SNHP)	458 dpa
Adjustments to Demographic-led Needs	921 dpa
Uplift for Market Signals?	1,105 dpa (+20%)
Employment Led Needs	842 dpa – 1,062 dpa
Affordable Housing Needs	1,910 dpa*
Uplift to demographic led needs for Affordable Housing? (rounded)	1,215 dpa
Uplift to address Student Housing Needs	84 dpa
Adjusted OAHN (Rounded)	1,300 dpa
Inherited Shortfall (2012-2017) annualised over the Plan period	153 dpa – 285 dpa
Annual Target (inclusive of shortfall)	1,453 dpa – 1,585 dpa

*Based on an affordable housing net annual need of 573 dpa at a delivery rate of 30%

8.0 **Analysis of the Forward Supply of Housing**

Introduction

- 8.1 Since the submission of the Local Plan in May 2018 the Council has released an updated Strategic Housing Land Availability Assessment (SHLAA) (May 2018). Unlike the previous version of the SHLAA (September 2017), it contains a detailed housing trajectory which sets out the anticipated delivery rates of draft allocations. The SHLAA also sets out the assumptions used in projecting the housing trajectory including lead-in times and build-out rates not previously available for review.
- 8.2 This section critiques the assumptions which underpin the housing land supply, also reiterating points made on other components of the Council's housing land supply which have been carried forward since the previous version of the SHLAA. It is important to be cautious in relation to the likelihood of sites delivering and the scale of that delivery. This is because the purpose of the assessment is to provide a realistic view of whether there is sufficient land available to meet the community's need for housing. If those needs are to be met a cautious approach must be taken.

Delivery Assumptions

Lead-in Times

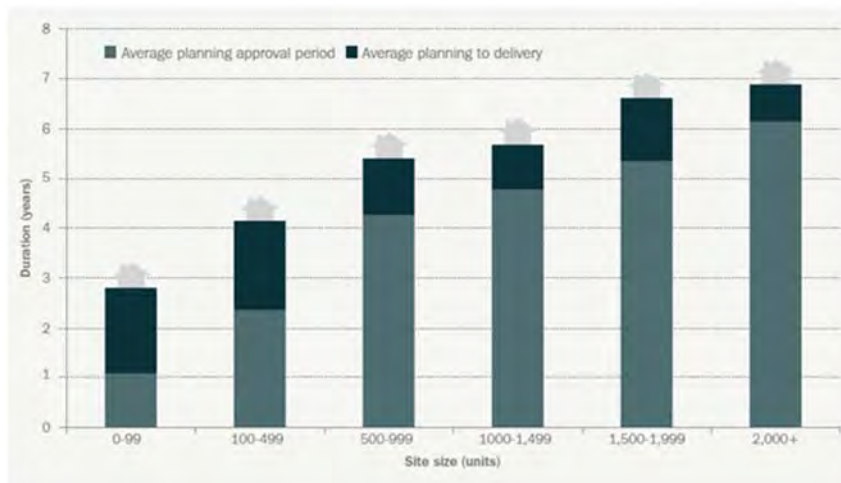
- 8.3 Whilst housebuilders aim to proceed with development on sites as quickly as possible, lead-in times should not underestimate inherent delays in the planning process (e.g. the approval of reserved matter and discharge of planning conditions) as well as the time taken to implement development (e.g. complete land purchase, prepare detailed design for infrastructure, mobilise the statutory utilities and commence development).
- 8.4 The timescales for a site coming forward are very dependent on a number of factors such as a developer's commitment to the site and the cost, complexity and timing of infrastructure as an example. The standard lead-in times should only be applied to sites where developers are actively pursuing development on the site and preparing the necessary planning application. The standard lead in time should not be applied universally and a degree of pragmatism and realism should be applied. Sites where developers have shown limited commitment, for example, should be identified as being delivered later in the trajectory.
- 8.5 Another fundamental element in calculating appropriate lead-in times relates to the size and scale of a site. As a generality, smaller sites can commence delivery before larger sites. Larger sites often have more complex issues that need to be addressed and require significantly greater infrastructure which must be delivered in advance of the completion of housing units. In some cases, the lead-in time on brownfield sites can also be greater given the time required for decommissioning services, demolition, dealing with ground contamination etc.
- 8.6 The SHLAA (2018) sets out the lead-in times which have been applied by the Council in respect of their housing trajectory. The lead-in times are based upon evidence contained within Annex 5 of the SHLAA ('SHLAA Assumptions for Evidence Bases'). The Council states that smaller – medium sites are more likely to come forward within 12 months, larger and 'exceptionally' large sites are more likely to be 12-18 months at a minimum.

8.7 The Council undertook a Housing Implementation Survey in 2015 to help draw together information regarding lead-in times. Our review of these lead-in times suggest that the overall conclusions do not reflect the full extent of the process from submitting a planning application to first completions on site. The lead-in times appear to be ambitious and do not provide a robust set of assumption to base the housing trajectory on.

8.8 Lichfields has undertaken extensive research on lead-in times on a national level with the publication of ‘Start to Finish’⁵¹, which contains robust evidence on typical lead-in times and build-rates. These findings are quoted elsewhere within Lichfield research such as Stock and Flow⁵² which the Council refers to within Annex 5 of the SHLAA. Whilst the Council has referenced this research it is unclear if the findings have been considered when formulating lead-in times. Whilst it is acknowledged by the Council that larger sites can have longer lead-in times it is unclear if any allowances have been made for large sites included within the housing trajectory.

8.9 It is considered that as a starting point the Council should consider the average lead-in times set out within ‘Start to Finish’ which are provided below:

Figure 9 Average Lead in Times



Source: Lichfields analysis, Figure 4 of ‘Start to Finish’

8.10 Lichfields has also provided commentary on lead-in times previously with the Housing Issues Technical Paper (March 2018), which can be found at Appendix 1. This builds upon the findings of Start to Finish to provide more localised commentary. Like Start to Finish an approach was taken to consider lead in times from the submission of the first planning application to the first completion on site. Table 14 provides a summary of these findings.

Table 14 Lead-in Times

Stage of Planning	0-250 units	250-500 units	500+ units
Full Planning Permission	1 year	1.5 years	2 years
Outline Planning Permission	1.5 years	2 years	2.5 years
Application Pending Determination	2.5 years	3 years	3.5 years
No Planning Application	3 years	3.5 years	4 years

Source: Lichfields

⁵¹ Nathaniel Lichfield & Partners (November 2016): *Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?*

⁵² Nathaniel Lichfield & Partners (January 2017): *Stock and Flow: Planning Permissions and Housing Outputs*

- 8.11 Both *Start to Finish* and the assumptions set out within the *Housing Issues Technical Paper* demonstrate that the Council's approach to lead-in times is not robust. There are examples within the trajectory which we consider demonstrate that the Council's current assumptions are ambitious. This includes the proposed lead-in times for proposed allocations ST14 and ST15.
- 8.12 ST14 (Land west of Wigginton Road) has a proposed capacity of 1,348 dwellings, currently there is no application being determined by the Council. Assuming an outline application is submitted in 2019 and following Start to Finish, it would be expected that first completions would be in 2024 (5.5 years).
- 8.13 Similarly, ST15 (land west of Evington Lane) is a proposed new settlement with a capacity of 3,330 dwellings within the emerging plan. There would be significant upfront infrastructure requirements before any housing completions took place. Again, if an outline application is submitted in 2019, and following Start to Finish, it would be expected that first completions would be in 2026 (6.9 years).
- 8.14 It is considered that the position set out above should be adopted when considering lead in times. The Council's current approach does not provide a realistic or robust position when considering likely lead in times. The Council should provide clear justification if there is a departure to these timescales.

Delivery Rates

- 8.15 Whilst housebuilders aim to deliver development on site as quickly as possible, in a similar fashion to the lead-in times outlined above, the annual delivery rate on sites will depend on a number of factors including overall site capacity.
- 8.16 Within the SHLAA (2018) the Council has taken the approach to apply a build out rate to site allocations of 35 dwellings per outlet, per annum. This is applied in multiples as the number of outlets are likely to increase. For larger schemes the Council envisage that there could be up to four outlets after the initial infrastructure phase has been completed.
- 8.17 It is considered that the Council's approach is a reasonable starting point, however, research undertaken by Lichfields demonstrates that build rate assumptions are more complex. Whilst it is acknowledged that larger sites can support more outlets this isn't always the case and will be influenced by the size, form and housing mix of the development. Overall market absorption rates mean the number of outlets is unlikely to be a fixed multiplier in terms of number of homes delivered.
- 8.18 Lichfields has provide commentary on delivery rates previously with the Housing Issues Technical Paper (March 2018). In our experience, sites with a capacity of less than 250 units are built out by one housebuilder using one outlet. As such, a reasonable average annual delivery rate in York is 40 dpa for sites with a capacity of less than 250 units. However, on sites of less than 100 units we have assumed a lower delivery rate of 25 dpa as these sites will generally be delivered by smaller housebuilders.
- 8.19 Generally, in York on sites with a capacity of between 250 units and 500 units there is often a second developer (or national housebuilders use a second outlet) delivering units simultaneously. As such, annual delivery rates increase but not exponentially to the number of housebuilders or delivery outlets. In our experience in the current market, sites with 2 outlets deliver approximately 65 dpa.
- 8.20 Finally, on large-scale sites with a capacity of more than 500 units, there are often up to three housebuilders or outlets operating simultaneously. As before, this does not increase

delivery exponentially, but it can be expected that three outlets operating simultaneously on a large scale would deliver approximately 90 dpa.

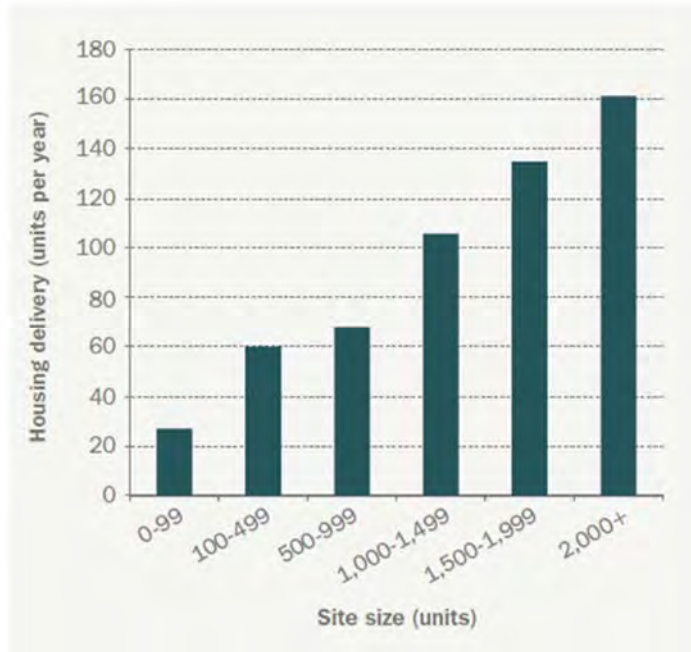
Table 15 Annual Delivery Rates

	0-100 units	100-250 units	250-500 units	500+ units
Annual Delivery	25 dpa	40 dpa	65 dpa	90 dpa

Source: Lichfields

8.21 Furthermore, *Start to Finish* analyses build rates based on national research. Whilst the findings shown in Figure 10 are average figures, it demonstrates that large sites do not necessarily deliver more homes on an exponential basis.

Figure 10 Housing Delivery Rates



Source: Lichfields analysis, Start to Finish

8.22 Lichfields considers that it would be appropriate to apply the delivery rates identified above. The quantum of delivery of units on a site can be affected by a significant number of factors including local market conditions, general economic conditions, proximity to competing site, housing market area, type and quality of unit and the size of the development. There will be a number of sites in York that will experience higher annual delivery rather than the averages outlined above but there will also be a number of who deliver below the average also. It is therefore important not to adopt an average delivery rate which may only be achieved by a small minority of the strategic sites.

Density Assumptions

8.23 The SHLAA (2018) (page 22) sets out the density assumptions for each residential archetype. The assumptions are the same as those contained within the previous SHLAA and based upon the findings of the 2014 Housing Viability Study. Lichfields has commented on the density assumptions for each residential archetypes previously and reiterates these comments below.

- 8.24 It is considered that the proposed densities are overly ambitious and will not be achieved on average on sites throughout York. For example, from our experience, it is not anticipated an average density of 50dph on sites of 1ha+ with a gross to net ratio of 95% can be achieved. Meeting open space requirements alone will preclude this ratio. There will be a very limited number of examples where this density has been achieved but a more appropriate and conservative figure should be pursued in the absence of firm details from a developer. The gross to net ratio at most should be 85%, although this can reduce to less than 60% for larger developments with significant infrastructure requirements.
- 8.25 Secondly, it is considered that a density of 40dph on suburban sites is highly aspirational and is unlikely to be achieved across a significant number of sites. This density is characterised by housing for the smaller households and thus not suitable for family accommodation. Our housebuilder clients and local intelligence has reaffirmed our concerns with the proposed average densities. Unless there is specific evidence to the contrary the default density on suburban sites should be 35 dph.
- 8.26 The Council has not provided sufficient information to back up their assumptions and we consider that these development densities should be revised downwards to ensure that the capacity of sites is not artificially inflated. Assumptions on development densities in the absence of specific developer information should air on the side of caution and we consider that the details in the 2018 SHLAA are at variance with this principle.

Components of the Housing Land Supply

Allocations

- 8.27 The Framework (2012) stresses the intention of the Government to significantly boost the supply of housing. As a consequence, the focus of national policy is to ensure the delivery of housing and in that context. The Framework advises that Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land (paragraph 47).
- 8.28 The definition of deliverability as set out within the NPPF states that to be considered deliverable:
- “sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.”* [Footnote 11]
- 8.29 The Planning Practice Guidance (PPG) sets out further guidance⁵³ in respect of what constitutes a deliverable site. It states:

⁵³ PPG Paragraph: 032 Reference ID: 3-032-20140306

“Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within 5 years.

However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the 5-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. If there are no significant constraints (eg infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a 5-year timeframe.

The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust 5-year housing supply”.

- 8.30 When assessing a 5-year supply position, it is important to be cautious in relation to the likelihood of sites delivering and the scale of that delivery. This is because the purpose of the assessment is to provide a realistic view of whether there is sufficient land available to meet the community’s need for housing.
- 8.31 The Council should adopt a more cautious approach when seeking to include strategic allocations within the five year supply. It is considered that a number of the proposed allocations do not have a realistic prospect of delivering housing within the next five years when applying more robust assumptions in terms of lead-in and build rates.

Sites with Planning Permission

- 8.32 It is now a standard approach that sites with planning permission should be included in the supply (unless there is a good reason to exclude them) whereas sites without planning permission should be excluded (unless there is a good reason to include them). This interpretation is entirely logical as the absence of a planning permission is a clear impediment to development, which is contrary to the test that land should be available now.
- 8.33 As set out within the SHLAA (2018) the Council apply a 10% non-implementation rate to extant planning permissions and site allocations identified for housing development. The evidence which underpins the Council’s justification is set out within Annex 5 to the SHLAA. This has been carried forward into Table PM21d of the Proposed Modifications to the York Local Plan, albeit the Council has also included a separate table (PM21c) which does not include the discount). The addition of the non-implementation is welcomed and is in line with approaches taken elsewhere when reviewing housing delivery.

Windfalls

- 8.34 The Council’s position on windfall allowance is based upon the Windfall Allowance Technical Paper (2017) and remains the same as the previous version of the SHLAA. The Council claims that 169dpa will be delivered on windfall sites from Year 3 of the trajectory (2020/21) and provides justification for their windfall allowance within the Technical Paper.

- 8.35 The Framework⁵⁴ sets out the local planning authorities may make allowance for windfall sites in the 5-year supply if they have compelling evidence that they will provide a reliable source of supply. Furthermore, any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends.
- 8.36 Lichfields accept that windfalls should be included in the overall housing delivery trajectory but only consider that they are appropriate **outwith the first 5-year period**. The inclusion of a significant windfall figure in earlier years increases the likelihood of artificially inflating the housing delivery figures in year 3 and double counting sites with permission. It does not account for any potential delays to the build out sites with extant consent. As such, the windfall allowance should be amended to only make an allowance from Year 5 (2022/23) onwards.
- 8.37 The Council consider that an annual windfall of 169dpa is appropriate to take account of potential delivery on sites of <0.2ha and completions on change of use and conversion sites.
- 8.38 However, the figure of 169 dwellings has only been achieved four times over the past 10 years and only twice since 2012. This is during a period when the application of a very tight inner Green Belt boundary has precluded urban edge development at a time of ever increasing housing demand. In such circumstances it would have been an ideal period for windfall development to increase; but it did not. There is therefore no justification for such a high allowance.
- 8.39 In relation to the delivery on sites of <0.2ha, Lichfields consider that the proposed windfall allowance is too high because tightly defined settlement boundaries in York and surrounding settlements means there is a finite supply of sites which can come forward. This supply has been curtailed by the change in definition of previously developed land (June 2010) to remove garden sites. In addition, the Council started to request small sites to make contributions towards affordable housing provision and required rural sites with a capacity of more than 15 units to provide on-site affordable housing. This has made the provision of units on small sites less attractive to the market. Since the policy change and the introduction of affordable housing contributions the quantum of completions on windfall sites in York has plummeted. As a consequence, the future supply from this source should only consider the average completion rate since 2009/10 of 33dpa.
- 8.40 In relation to the delivery from conversions, the average completion figure in the past three years is largely dependent on recent changes to permitted development rights. As a consequence, it is considered that after an initial surge the conversion rate will revert back to the long term average. It is likely that the optimum conversion sites will be completed in the short term and the less sustainable and attractive office developments in York will not be converted. As such the average conversion rate from 2007/08 to 2013/14 of 64dpa should be used.
- 8.41 Based on the above assessment it is considered that the proposed windfall allowance should be reduced from 169dpa to 100dpa (rounded up from 97) which represents a far more realistic windfall allowance over the plan period. The incorporation of this figure would ensure that the Council's trajectory is not artificially inflated, can be realistically achieved and would only be incorporated into the delivery trajectory at Year 5 (2022/23) to ensure no double counting.

⁵⁴ NPPF (2019), §70

- 8.42 It is considered that the Council's information does not adequately justify a windfall allowance of 169dpa and does not provide sufficient certainty that this figure will be achieved over the plan period.
- 8.43 Therefore, in this instance we consider that it is not appropriate that the City of York includes a windfall allowance within the first 5 years of the plan period. We reserve the right to revise our position on windfalls if the Council prepares and releases further justification.

Under Supply

- 8.44 The PPG⁵⁵ states that the level of deficit or shortfall should be added to the plan requirements for the next five- year period where possible (Sedgefield approach). If LPAs are minded to deal with the shortfall over a longer period (Liverpool method) the Practice Guidance advises that Local Authorities work with neighbouring authorities under the duty to cooperate.
- 8.45 It is stated within the SHLAA (2018) that the Council has adopted the 'Liverpool' method when dealing with past under delivery. Whilst the Council state there are 'local circumstances' which warrant a longer-term approach, it is not clear where the justification is which wants the Liverpool method. It is considered that further information should be provided by the Council which justifies a departure from addressing the shortfall within the next five- year period.
- 8.46 PM21d of the Proposed Modifications sets out the Council's latest housing trajectory which utilises the Liverpool method. The Council states that the inherited shortfall from the period between 2012 – 2017 (prior to plan period of Local Plan) is 518 dwellings. Lichfields has concerns that the way in which the Council has calculated historic housing completions, shown within table 5 of the SHLAA (2018), is flawed and is inflated through the inclusion of privately managed off-campus student accommodation. Furthermore, in line with both the 2014 and latest 2019 iterations of the PPG, Lichfields considers that the Council should deal with backlog in full against planned requirements within the first 5 years of the plan period (i.e. the 'Sedgefield' approach to backlog).
- 8.47 Table 2 of this report shows past delivery against the Council's possible policy benchmarks for the period 2004/05 – 2015/16. It demonstrates that the inherited shortfall is significantly higher than current accounted for by the Council. This will have an impact on the Council's five- year supply calculation, with the potential requirement for more sites to be identified to meet the undersupply and the housing requirement moving forward.

Application of the Buffer

- 8.48 As shown on Figure 2 of this report, the Council has a record of persistent under-delivery over the past 10 years. Only once (in 2017/18) since 2006/07 has the Council actually delivered more than 691 dwellings in a single year. The Council also confirms that there is a history of under-delivery within the SHLAA (2018). In line with paragraph 47 of the NPPF (2012) the Council should apply a 20% buffer to provide a realistic prospect of achieving the planned supply.
- 8.49 In respect of applying the buffer, it should be applied to both the forward requirement and the under-supply. This approach accords with the Framework, which suggests that the buffer should be added to the total requirement which would, inevitably, include any

⁵⁵ Paragraph: 035 Reference 3-035-20140306

under delivery from earlier years. In this regard, the purpose of the buffer is to increase the supply of land; it does not change the number of houses required to be built within that period. Put simply, the buffer is not, and it does not become, part of the requirement; it is purely a given excess of land over the land supply necessary to permit the identified need for housing to be delivered.

Calculating Housing Land Supply

- 8.50 Lichfields has concerns in respect of the way in which the Council has calculated its five-year housing land supply. Table 6 of the SHLAA (2018) and Table PM21c/d of the Proposed Modifications sets out the Council’s assessment of its position and has projected forward a five- year supply for the years 2018/19 to 2022/23. However, the calculation sets out a supply figure over a six- year period (2017/18 – 2022/23) as opposed to a five- year period (2018/19 – 2022/23).
- 8.51 It is also unclear how the Council has arrived at its proposed 6.38 years supply, including the additional 0.38 years as a result of a remaining oversupply. It is considered that the Council’s approach of calculating its 5YHLS does not accord with the 2014 PPG / 2012 NPPF approach to calculating housing supply. The Council must provide more detail on how the it has arrived at the stated five- year supply figure.
- 8.52 For comparison, we set out below our understanding of the Council’s housing land supply calculation for the five- year period 2017/18 – 2021/22 using data from Table PM21c and PM21d of the Proposed Modifications to the York Local Plan. This calculation is for illustrative purposes only and based on the Council’s completion figures without any amendments. We have utilised the Council’s OAHN assumption of 790 dwellings and applied the Sedgfield method to calculate inherited shortfall.

Table 16 Five year housing land supply calculation - based on figures within SHLAA (2018)

Five year housing land supply calculation		Dwelling Number
A	Annual housing target across the Plan period	790
B	Cumulative target (2017/18 – 2021/22)	3,950
C	Inherited shortfall (2017/18 – 2021/22)	518
D	20% buffer	894
E	Five- year requirement (B+C+D)	5,362
F	Total estimated completions (2017/18 – 2021/22) (Figure 6)	5,346
G	Supply of deliverable housing capacity	4.99 years

Source: Lichfields analysis

- 8.53 Table 17 sets out the Council’s 5YHLS for the period 2017/18 – 2021/22, based on Lichfields’ conclusions on the Council’s housing need and inherited shortfall (2012 – 2017). The calculation utilises the Sedgfield method of addressing the full backlog, whilst a 20% buffer has been applied and the windfall allowance has been excluded as set out within this report. The calculation below uses the Council’s evidence base in terms of projected completions from the SHLAA (2018) / York Local Plan Proposed Modification updated Figure 6. Lichfields reserves the right to interrogate the Council’s supply in more detail prior to the EiP.

Table 17 Five year housing land supply calculation - Lichfields OAHN

Five year housing land supply calculation		Dwelling Number
A	Annual housing target across the Plan period	1,300
B	Cumulative target (2017/18 – 2021/22)	6,500

Five year housing land supply calculation		Dwelling Number
C	Inherited shortfall (using Lichfields OAHN)	3,068
D	20% buffer	1,914
E	Five- year requirement (B+C+D)	11,482
F	Total estimated completions (2017/18 – 2021/22) (Figure 6)	5,008
G	Supply of deliverable housing capacity	2.18 years

Source: Lichfields analysis

8.54 Table 17 clearly demonstrates that the Council cannot demonstrate a 5YHLS based upon Lichfields OAHN. Furthermore, based on the Council’s own housing trajectory (updated figure 6) they do not have an adequate cumulative housing supply across the plan period up to 2032/33 (16,685 dwellings) to meet the Lichfields OAHN figure of 1,300 dpa (20,800 dwellings + backlog). There would be a very significant shortfall of 4,115 dwellings even before any inherited backlog is added. This demonstrates that the Council must identify additional deliverable sites in its emerging Local Plan.

Conclusion

8.55 Lichfields has undertaken an analysis of the SHLAA (2018) and Proposed Modifications to the Local Plan which sets out the assumptions used to calculate the Council’s housing land supply.

8.56 The Council states that the inherited shortfall from the period between 2012 – 2017 is 518 dwellings, based on a lower OAHN of 790 dwellings. Lichfields has concerns that the way in which the Council has calculated historic housing completions, shown within table 5 of the SHLAA (2018) and Tables PM21c/d of the Proposed Modifications to the Local Plan, is flawed and is inflated through the inclusion of privately managed off-campus student accommodation.

8.57 We consider that some of the suggested delivery rates on proposed allocations are unrealistic and not based on robust assumptions. The evidence provided by the Council is not sufficient to demonstrate that the housing requirement over the first 5 years of the Plan will be achieved.

8.58 It is understood that there are a number of sites which are proposed to be allocated but have yet to have an application submitted. In order help ensure a 5 YHLS, the Council should demonstrate that there is a realistic prospect that housing will be delivered on site within five years. Lichfields has concerns regarding the Council’s approach to calculating its five- year housing land supply, including the way in which the Council has calculated historic housing completions.

8.59 Lichfields reserves the right to update the above evidence as and when further information becomes available.

9.0 Overall Conclusions and Recommendations

Conclusions on the City of York’s Housing Need

- 9.1 The Council’s approach to identifying an assessed housing need of 790 dpa in the HNU is fundamentally flawed. There are a number of significant deficiencies in the HNU which means that it is not soundly based. The scale of objectively assessed need is a judgement and the different scenarios and outcomes set out within this report provide alternative levels of housing growth for the City of York. Lichfields considers these to be as follows:
- 1 **Demographic Baseline:** The 2016-based household projections indicate a net household growth of 458 dpa between 2017 and 2033 (including a suitable allowance for vacant/second homes. Once a suitable adjustment has been made to rebase the projections to the (slightly higher) 2017 and 2018 MYEs, and through the application of accelerated headship rates amongst younger age cohorts, this takes the demographic starting point to 706 dpa. However, an analysis of the MYE estimates has raised significant concerns regarding the robustness of the international migration statistics underpinning the 2016-based SNPP. Applying long-term trends to international migration levels into York, which are more in line with net migration into the City, this would increase the demographic starting point to **921 dpa**.
 - 2 **Market Signals Adjustment:** GL Hearn’s uplift is 15%. However, for the reasons set out above, Lichfields considers that a greater uplift of at least 20% would be more appropriate in this instance. When applied to the 921 dpa re-based demographic starting point, this would indicate a need for **1,105 dpa**.
 - 3 **Employment growth alignment:** The demographic-based projections would support a reasonable level of employment growth at levels above that forecast by the ELR Scenario 2 (which has informed the Local Plan) and past trends. As such, no upward adjustment is required to the demographic-based housing need figure of 1,105 dpa to ensure that the needs of the local economy can be met;
 - 4 **Affordable Housing Need:** The scale of affordable housing needs, when considered as a proportion of market housing delivery, implies higher levels of need well above 1,105 dpa. It is considered that to meet affordable housing needs in full (573 dpa), the OAHN range should be adjusted to 1,910 dpa @30% of overall delivery. It is, however, recognised that this level of delivery is likely to be unachievable for York. Given the significant affordable housing need identified in City of York Lichfields considers that a further 10% uplift would be appropriate in this instance and should be applied to the OAHN, resulting in a figure of **1,215 dpa**.
 - 5 **Student Housing Needs:** household projections explicitly exclude the housing needs of students living in communal establishments. Furthermore, Lichfields’ critique of the projections clearly indicates that they do not adequately reflect the Universities’ student growth targets. It is estimated that meeting these growth needs would equate to around 1,346 dwellings over the 16-year Plan period, at an average of **84 dpa** on top of the 1,215 dpa set out above (i.e. **1,299 dpa**).
 - 6 **Rounded, this equates to an OAHN of 1,300 dpa between 2017 and 2033 for the City of York.** This is **22% higher** than the MHCLG standard methodology figure of 1,069 dpa.
 - 7 **Shortfall of housing delivery 2012-2017:** The Council is also making provision

for past under-delivery between 2012 and 2017. Lichfields has serious concerns about how the CoYC have calculated past housing delivery. Based on GL Hearn's OAHN of 790 dpa, and applying the MHCLG delivery figures, this suggests that an additional 153 dpa could be added on to the OAHN over the course of the 2017-2033 Plan period to address the backlog in full. If Lichfields' higher OAHN of 1,300 dpa is applied, this would result in a figure of **285 dpa** to be factored on top of the OAHN.

- 9.2 This allows for the improvement of negatively performing market signals through the provision of additional supply, as well as helping to meet affordable housing needs and supporting economic growth. Using this figure (of 1,300 dpa plus the unmet need 2012-2017) would ensure compliance with the Framework by significantly boosting the supply of housing. It would also reflect the Framework, which seeks to ensure the planning system does everything it can to support sustainable development.

Conclusions on the 5YHLS and Forward Supply of Housing

- 9.3 Lichfields has undertaken an analysis of the SHLAA (2018) and Proposed Modifications to the Local Plan which set out the assumptions used to calculate the Council's housing land supply.
- 9.4 The Council state that the inherited shortfall from the period between 2012 – 2017 (prior to plan period of Local Plan) is 518 dwellings. Lichfields has concerns that the way in which the Council has calculated historic housing completions, shown within table 5 of the SHLAA (2018) and Tables PM21c/d of the Proposed Modifications to the Local Plan, is flawed and is inflated through the inclusion of privately managed off-campus student accommodation.
- 9.5 We consider that some of the suggested delivery rates on proposed allocations are unrealistic and not based on robust assumptions. The evidence provided by the Council is not sufficient to demonstrate that the housing requirement over the first 5 years of the Local Plan will be achieved.
- 9.6 In line with the NPPF (2012) the Council should provide clear evidence that housing completions on sites will begin within five years. It is understood that there are a number of sites which are proposed to be allocated but have yet to have an application submitted. It is therefore up to the Council to demonstrate that there is a realistic prospect that housing will be delivered on site within five years.
- 9.7 Lichfields has concerns regarding the Council's approach to calculating its five- year housing land supply, including the way in which the Council has calculated historic housing completions.
- 9.8 Lichfields reserves the right to update the above evidence as and when further information becomes available.
- 9.9 Based on the OAHN Of 1,300 dpa identified by Lichfields, the assessment in this report clearly demonstrates that the Council cannot demonstrate a 5 YHLS.

Recommendations

- 9.10 Taking into account the above matter it is considered that City of York Council should:
- 1 Revisit the evidence base which underpins the minimum housing requirement figure of 790 dwellings, taking on board Lichfields' analysis which sets out that the

Council's OAHN is in the region of 1,300 dpa plus the housing backlog from 2012-2017.

- 2 Identify additional housing sites to meet the significant shortfall in housing need (between 2012 – 2017) and the higher annual requirement identified as part of the Lichfields' analysis of the Council's housing evidence base.
- 3 Revisit the 5YHLS assumptions which the housing trajectory is based upon to ensure they are robust and sufficient housing is identified to provide five years' worth of housing against requirement, plus delivering sufficient homes to meet the housing requirement across the plan period.

9.11 It is clear from analysis of the Council's evidence base that the approach to identifying an OAHN is not compliant with the Framework. The Council are not planning to deliver a sufficient supply of housing to meet the districts OAHN as identified by Lichfields. Furthermore, there are doubts that the housing trajectory is based on robust assumptions and therefore the Council's ability to deliver a five-year housing land supply or meet the housing requirement across the plan period.

9.12 The Council should therefore revisit their housing requirement and also seek to identify additional land to meet the housing needs of the district. In order to ensure an overall strategy that is deliverable and sufficiently flexible to respond to change. This will ensure compliance with the Framework by significantly boosting the supply of housing.

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From: Eamonn Keogh [REDACTED]
Sent: 22 July 2019 21:17
To: localplan@york.gov.uk
Subject: Proposed Modifications - Representations on behalf of Shepherd Homes Ltd
Attachments: 190719 Local Plan Reps Cherry In SUBMIT.pdf;
Local_Plan_Proposed_Mods_Response_Form_2019 Cherry In.pdf

Follow Up Flag: Follow up
Flag Status: Completed

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sirs,

Please find attached a representation on the Draft Local Plan Proposed Modifications on behalf of Shepherd Homes Ltd.

If you have any queries please get back to me.

Kind regards

Eamonn



O'Neill
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City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title	Mrs	Mr
First Name	Caroline	Eamonn
Last Name	Scott	Keogh
Organisation (where relevant)	Shepherd Homes	O'Neill Associates
Representing (if applicable)		
Address – line 1	██████████	Lancaster House
Address – line 2	██████████	James Nicolson Link
Address – line 3	██████████	Clifton Moor
Address – line 4	████	York
Address – line 5		
Postcode	██████████	YO30 4GR
E-mail Address		██
Telephone Number		01904 692313

Representations must be received by Monday 22 July 2019, up until midnight.

Representations received after this time will not be considered duly made.

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B -Your Representation

(Please use a separate Part B form for each issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM2; PM3, PM4, PM5, PM 13; PM14; PM18;
PM19; PM20a to 20d, PM21a to PM21d; PM22

Document:

Proposed Modifications Document;

Page Number:

8, 9, 10, 12, 17, 23, 24

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

We are not aware of any updated information that answers the points below that were made in our 2018 representations:

With regard to the duty to co-operate it may be the case the Council has consulted with neighboring authorities, but some of those authorities have expressed concerns that have not been fully resolved. Annex B to Agenda item 11 on the report of the Local Plan to the Council's Executive on the 25th January reported:

Hambleton Council: "...It [the Draft Plan] does not safeguard land for development and recognises the build out time of the Strategic sites will extend beyond the plan period. The proposed detailed boundaries of the Green Belt offer little opportunity to accommodate the increased level of growth proposed. If the City of York does not ensure that its longer-term development needs are met this will place pressure on area in neighbouring authorities"

Leeds city region LEP: "York has not applied the 10% market signals adjustment as recommended in the York 2017 Strategic Housing Market Assessment".

Ryedale Council: Discussions ongoing

Harrogate Council: Discussion ongoing

Selby District Council: *“Having read the SHMA Addendum, it is noted that this figure does not take into account the level of employment growth proposed by the Local Plan.....Whilst you are confident that you can realise the growth aspirations detailed within the Pre-Publication Local Plan within the City of York Boundary, Selby District Council is concerned that any increases to this figure could raise significant cross-boundary issues”.*

Selby Council requested additional information on Strategic site ST15 and the university site ST27 before providing any further comments on the potential impact these allocations may have on Selby.

What these comments demonstrate is that whilst the Council may have engaged in a process of dialogue with neighbouring authorities, it has not produced outcomes that have addressed some significant concerns of neighbouring authorities. Indeed, at this stage the views of some adjoining Authorities are not known and it is difficult to see how, in these circumstances, the Duty to Co-Operate has been complied with.

What does ‘Sound’ mean?

Soundness may be considered in this context within its ordinary meaning of ‘fit for purpose’ and ‘showing good judgement’. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework’s four ‘tests of soundness’ listed below.

What makes a Local Plan “sound”?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

See attached representation document Ref: 1907.cln.0001.lpreps.ek

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

Proposed changes are included in the representation document included with this representation

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are significant matters relating to the Housing requirement and proposed allocations that we wish to explore in more detail with the Inspector. We believe we can make a positive and constructive contribution to the discussion

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 2018 to inform the Local Plan process. We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't. City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

Signature

Date

CITY OF YORK COUNCIL LOCAL PLAN

PROPOSED MODIFICATIONS JUNE 2019

LAND SOUTH OF CHERRY LANE YORK, YORK

SHEPHERD HOMES LIMITED

REPRESENTATIONS IN
SUPPORT OF AN ALLOCATION
FOR HOUSING

July 2019



Chartered Town Planning Consultants

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- 1.0 INTRODUCTION
- 2.0 OBJECTION TO PROPOSED MODIFICATIONS PM3, PM4, PM5, PM20a to 20d, PM21a to 21d AND PM 22HE SITE
- 3.0 COMMENTS ON UPDATED GREEN BELT EVIDENCE TPI

APPENDICES

- 1. Outstanding commitments | April 2018
- 2. Housing Allocations Trajectory

1907.cln.0001.lpreps.ek
25 July 2019

I.0 INTRODUCTION

- I.1 This statement is provided as a representation in response to the Proposed Modifications to the Draft Local Plan June 2019 (**the Draft Plan**) on behalf of on behalf of Shepherd Homes Limited in respect of land south of Cherry Lane, Dringhouses, York.
- I.2 The detail justification for the allocation of the site for residential development is set out in our representations made on the Publication Draft Plan in April 2018. In drafting our representations on the proposed modifications, we are mindful that the Draft Plan is being examined under the transitional arrangements and the relevant National Planning Policy is the NPPF March 2012.
- I.3 Table I below sets out our response to the proposed modifications and indicates, where appropriate, additional commentary to our response can be found.

Table I - Summary of our response on the Proposed Modifications

Proposed Modification	Response	Comment
PM2 Removal of deleted Policies from the Plan	We agree with the proposed modification	Updated evidence prepared by the Council supports the proposed modification
PM3 Explanation of City of York Housing Needs	We object to the proposed modification	Our objection is elaborated in section 2 of this representation
PM4 Policy SS1: Delivering Sustainable Growth for York	We object to the proposed modification	Our objection is elaborated in section 2 of this representation
PM5 - Policy SS1: Delivering Sustainable Growth for York	We object to the proposed modification	Our objection is elaborated in section 2 of this representation

PM13 - Policy SS19: Queen Elizabeth Barracks, Strensall	We agree with the proposed modification	Updated evidence prepared by the Council supports the proposed modification
PM14 - Policy SS19: Queen Elizabeth Barracks, Strensall	We agree with the proposed modification	Updated evidence prepared by the Council supports the proposed modification
PM18 - Policy HI: Housing Allocations(H59)	We agree with the proposed modification	Updated evidence prepared by the Council supports the proposed modification
PM19 - Policy HI: Housing Allocations (ST35)	We agree with the proposed modification	Updated evidence prepared by the Council supports the proposed modification
PM20a to PM20d - Policy HI: Housing Allocations	We object to the proposed modification	The allocations are inadequate to meet the housing needs of the City. Our objection is elaborated in section 2 of this representation
PM21a to PM21d - Policy HI: Housing Allocations	We object to the proposed modification	The allocations are inadequate to meet the housing needs of the City. Our objection is elaborated in section 2 of this representation
PM22 - Policy HI: Housing Allocations Explanation	We object to the proposed modification	The allocations are inadequate to meet the housing needs of the City. Our objection is elaborated in section 2 of this representation

2.0 OBJECTION TO PROPOSED MODIFICATIONS PM3, PM4, PM5, PM20a to 20d, PM21a to 21d AND PM

The Plan Period

2.1 The Submission Draft Plan (May 2018) proposes a 16-year plan period from April 2017 to March 2033. For the purpose of these representations and particularly for the purpose of calculating the housing requirement, we assume that the plan period will remain as 16 years but with a start date of April 2019.

The Housing Requirement

2.2 We addressed the issue of housing requirement in our 2018 representations. This section will update our position on the housing requirement having regard to:

- the proposed modification reduction in the housing requirement to 790 dwellings per annum; and
- figures for two additional years of housing completions that have become available since our previous representations.

2.3 In response to the proposed modifications these representations will:

- Put forward an alternative housing requirement;
- Identify a more realistic housing land requirement

2.4 The evolution of the current proposed housing requirement figure of 790 dwellings per annum can be traced back the to the 10th July 2017 Local Plan Working Group (LPWG). The officers report to that LPWG identified an annual housing requirement of 953 dwellings composed of a demographic baseline of 867 dwellings and an upward adjustment for 'market signals' of 10%. The LPWG report stated that the Plan period would run from 2012 to 2033.

2.5 On the basis of the LPWG report the housing requirement for the Plan period 2012 to 2033 was therefore 20,013 (21 × 953). The housing requirement need calculation for the period 2033 to 2038 would be 4,765 (5 × 953). In calculating the land required to

meet the housing requirement for the LPWG report, the Council had regard to completions to date and unimplemented permissions. The Council also assumed a windfall completion rate of 169dpa from year 4 of the plan 2020/21. Having regard to completions, commitments and windfalls, the Council's estimate of the remaining housing requirement for the Plan Period is set out in table 1 below:

Table 2 Council's Estimate of Housing Requirement as presented to Local Plan Working Group on 10th July 2017

Plan period 1st April 2012 to 31 st March 2033	
Total Need 2012 -2033 (based on 953)	20,013
Completions 1st April 2012 to 31st March 2017	3,432
Unimplemented Permissions @ 1st April 2017	3,758* (3,578)
Windfalls (from Year 4) @ 169 pa**	2,197
Requirement Remaining	10,626 (10,806)

Source: Local Plan Working Group 10 July 2017

*We believe this to be a misprint and should be 3,578

** For the period 2020/21 to 2032/33

- 2.6 Members did not agree with the assessment of the housing requirement presented by officers and instead set the housing requirement at 867 dwellings per annum and that was the figure used for consultation in the Pre-Publication Draft Local Plan in September 2017.

Local Plan Working Group January 23rd 2018

- 2.7 On the 23 January 2018, the LPWG considered the representations made on the Pre-Publication draft plan. Members were informed that using the draft methodology for assessing housing requirement that the Government had consulted on in late 2017, the housing requirement for the City was estimated to be 1,070 dwellings. Members were advised that although this figure was an estimate produced by the draft methodology it nevertheless indicated the direction of travel anticipated for national planning policy.

Publication Regulation 19 Consultation Draft Local Plan February 2018

- 2.8 The Publication Draft Plan proposed a 16-year plan period with a start date of 1st April 2017. This is a change from the report to the July 2017 LPWG that assumed a plan start date of 2012. This changes the basis of the calculation of the housing requirement. Completions are not included in the calculation of the housing requirement as the plan start date (2017/18) was essentially year zero in the calculation. Instead the Council include an allowance for backlog (or under-provision) for the period 2012 to 2017.
- 2.9 The housing requirement in the Draft Plan was therefore based on an annual base requirement of 867 dwellings to which the council has added an additional 56 units per annum to account for undersupply in the period 2012 to 2017 giving a total requirement of 923 dwellings per annum
- 2.10 Taking account of these changes, the housing requirement as proposed in the Draft Plan was:

**Table 3 Publication Draft Regulation 19 Consultation Plan
Housing Requirement (At Time of Publication)**

Plan period 1st April 2017 to 31 st March 2033	
Total Need 2017 -2032/33 (based on 923 dwellings per annum 867 + 56))	14,768
Less unimplemented Permissions @ 1st April 2017	3,578
Less windfalls (from Year 4) @ 169 pa	2,197
Requirement to be provided through allocations	8,993

- 2.11 In addition, to ensure what the Draft Plan considers to be enduring Green Belt Boundaries, additional land is allocated to meet the annual base requirement of 867 dwellings per annum for the 5-year period of 2033 to 2038 which effectively increases the housing requirement to be provided through allocation for the period 2017 – 2038 to 13,328 ((8993 +(867x5)).

- 2.12 Following the submission of the Draft Plan and in response to questions from Local Plan Inspectors, the Council commissioned another update of the OAN – Housing Needs Update January 2019 (HNU). This update produced an OAN of 790 dwellings per annum based on 2016 Sub National Population Projections and 2016 based Household Projections. This is a significant reduction in OAN compared with previous estimates.
- 2.13 The Council's letter to the Inspectors dated 29 January 2019 stated that the updated OAN confirmed to the Council that the 867 dwellings per annum proposed in the submitted Plan can be shown to robustly meet requirements. There was no suggestion that the housing requirement was to be reduced to 790 dwellings per annum.
- 2.14 Table 4 below illustrates the implication for the housing requirement of the Plan period of applying the updated OAN.

**Table 4 Housing Requirement using OAN of 790 dwellings
Per annum as proposed by the Modifications**

Plan period 1st April 2017 to 31 st March 2033	
Total Need 2017 -2032/33 (based on 790 dwellings per annum)	12,640
plus 32 dwellings per annum to meet backlog	512
Total Requirement	13,152
Unimplemented Permissions @ 1st April 2018 less 10% for non-implementation (3,345 x 0.9)	3,010
Windfalls (from Year 4) @ 169 pa	2,197
Requirement to be provided through allocations ((13,153) -3,010 + 2,197)	7,946

- 2.15 We consider this (Council) assessment of the requirement remaining and the housing allocations set out in the Draft Plan to be inadequate for the following reasons:

- (i) The use of 2016 population and household projections is contrary to Government Guidance
- (ii) The housing need calculation is too low;
- (iii) The calculation of completions since 2012 is too high (i.e. the Councils estimate of backlog is too low)
- (iv) Outstanding commitments include student housing that should be excluded
- (v) Windfalls should not be include in the Local Plan Calculation

(i) **The 2016 Household Projections.**

2.16 The January 2019 HNU advises that the OAN for the district is 790 dwellings per annum. This is a figure derived using the 2016 based SNPP, the 2016 based Household Projections and the latest mid-year estimates. We disagree with this figure for several reasons.

2.17 The Council's proposed modification to the housing requirement from 867 to 790 adds further unnecessary confusion to the housing figure debate. The modification is contradictory to the advice given by the Council in its letter of 29th January to the Inspectors which stated that the updated SHMA work has been undertaken to:

“seek to confirm that the 867 dwellings per annum proposed in the submitted Plan can be shown to robustly meet requirements”.

2.18 Fundamentally, the way the OAN has been calculated is contrary to National Planning Policy. This is confirmed by the Government in the updated Planning Practice Guidance (revised in 20th February 2019) where Paragraph 005 Ref Id. 2a-005-20190220 states that:

“The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes”.

2.19 Accordingly, whether using the “old” or “new” standardised methodology, it is clear that the Government have rejected the 2016 projections and consequently their use in the calculation of an LPA's annual housing requirement. From a practical point of view, given the unequivocal stance of the updated Planning Practice Guidance, the Government is not going to revisit and update the old guidance to make clear that the 2016 projections have been rejected.

2.20 This is particularly the case of plans being prepared under the “transitional arrangements” whereby Local Plans submitted ahead of January 2019 will be assessed on the basis of the old methodology and importantly the evidence base it relied upon at that time. The purpose of the transitional arrangements is to avoid exactly the situation the Council have created by revisiting the OAN.

2.21 The shortcomings of the use of the 2016 population and household projections are acknowledged in the HNU:

2.20 The main change is the period from which household formation rates trends have been drawn. Previously these were based on trends going back to 1971 but in the most recent projections trends have only been taken from 2001.

2.21 It is argued that by focussing on shorter term trends ONS have effectively locked in deteriorations in affordability and subsequently household formation rates particularly within younger age groups in that time

2.22 In addition, the HNU highlights the pressure on house prices in the City:

4.1 As shown in the figure below, the median house price in York sits at £230,000, near parity with England's median value of £235,995. The City is also more expensive than the North Yorkshire and Yorkshire and Humber equivalents of £210,000 and £157,500 respectively.

*4.2 Perhaps even more interesting to note is that lower quartile house prices in York exceed that of England by £30,000 despite having a similar overall median house price. Relatively higher values within a lower quartile housing range suggests that those **with lower incomes (such as first-time buyers) feel greater housing pressure and are less likely to be able to afford a property.** (Our emphasis)*

2.23 On the issues of affordability, the HNU is even more damning. It states:

4.17 At the median level, York has the highest affordability ratio, and thus the least affordable housing, relative to surrounding North Yorkshire, Yorkshire and Humber, and England. In addition, the affordability ratio in York has also increased the most in the past five years relative to the other geographies – indicating a significant worsening in affordability..... (Our emphasis)

4.19 The affordability statistics and the market signals reveal that as a whole, York is becoming increasingly more unaffordable and that a market signals adjustment in the City is necessitated.

2.24 The HNU reaffirms the net affordable housing need at 573 dwellings per annum

2.25 The Council's reliance on the 2016 population and household projections is not only contrary to Government guidance, but also flies in the face of the evidence demonstrating the very high demand for housing in the face of diminishing supply. The evidence points overwhelmingly to strong and entrenched market signals issues across York evidenced by worsening affordability. Fundamentally the HNU promotes a low housing requirement figure that contradicts the Government's objective of significantly boosting the supply of housing particularly in areas of high housing need such as York.

(ii) Housing Requirement

2.26 For the purpose of calculating the housing requirement we continue to use the Government's figure of 1,070 dwellings per annum used in our 2018 representations.

(iii) Calculation of completions - Backlog

2.27 The updated backlog table is set out below. Student completion have been excluded for the reasons set out in our 2018 representations.

2.28 To calculate the backlog, our assessment uses the figure of 953. This is the housing requirement figure recommend by the Council's independent Consultants, G L Hearn for the period from 2012 in the report to the July 2017 LPWG.

Table 5 Housing completion backlog for the period 2012-2019

Year	Net Dwellings Added (Council Figures)	Less student units	Net C3 Dwelling units	2017 SHMA recommended figure	Backlog/ Surplus	Housing delivery test indicator
2012/13	482	0	482	953	-471	50.6%
2013/14	345	0	345	953	-608	36.2%
2014/15	507	0	507	953	-446	53.2%
2015/16	1121	579	542	953	-411	56.9%
2016/17	977	152	825	953	-128	86.6%
2017/18	1296	637	659	953	-294	69.2%
2018/19	449	40	409	953	-544	42.9%
Total	5,177	1,408	3,769	6,671	-2,902	

(iv) Commitments

2.29 We have obtained a list of the planning permissions that make up the Council's estimate of un-implemented planning permissions at 1st April 2018 (Appendix 1). The figure of 3,345 includes 95 student units which, for the reasons stated above should not be included in the housing provision figures. This reduces the commitments figure to 3,250. A further discount of 10% should be applied to account for non-implementation of a proportion of these commitments, giving a more robust figure of 2,925 dwellings for outstanding commitments.

(iv) Windfalls

2.30 For the reasons set out in our 2018 representations windfalls should not be included in the calculation of the housing requirement

2.31 Taking all the above factors into account, our estimate of the housing requirement compared with the Councils estimate as set out in paragraph 3.5 above is:

Table 6 Estimate of Housing Requirement 2019-2035

Plan period 1st April 2019 to 31 st March 2035	Publication Draft Plan adjusted to 2019 start year	Proposed Modifications adjusted to 2019 start year	Our Estimate
Total Need 2019-2035 (16 Years)	13,872 (based on 867 per annum)	12,640 (Based on 790 per annum)	17,120 (based on 1,070 per annum)
Backlog	896 (56 x 16)	512 (32 x 16)	2,902
Gross Requirement	14,768	13,152	20,022
Unimplemented Permissions	3,578 (As at 1/4/17)	3,010** (As at 1/4/18)	2925*** (As at 1/4/18)
Windfalls (from Year 4) @ 169pa	2,197	2197	0
Net Requirement	8,993	7,945	17,097

* Excluding student accommodation

** Includes 10% non-implementation discount.

*** Includes 10% non-implementation discount and excludes student accommodation

2.32 It is evident from this analysis that the Council's estimate of the housing requirement is significantly flawed and consequently significant additional allocations are required to address that shortfall.

2.33 In addition to meeting housing land requirement during the plan period, the Council also have to exclude land from the Green Belt for development beyond the plan period to ensure green belt boundaries will endure for some time beyond the Plan Period. The Council propose to meet this objective by allocating housing land for the period 2033 to 2038. Using the Councils baseline requirement figure of 790, the requirement for the 5-year period beyond 2033 would be 3,950 dwellings. Using the Government's figure of 1,070 the requirement would be 5,350

2.34 We have taken the table of proposed allocations from table 5.1 of the Draft Plan as proposed to be modified. From that we have applied what we believe to be reasonable assumptions about the potential delivery trajectory from each site based on the information provided in the table and other sources (Appendix 2). For example, we

assume no delivery from the British Sugar site in the first 5 years of the plan for the reasons outlined in paragraph 2.60 above.

2.35 The allocations in table 5.1 of the Draft Plan, as amended, amount to 14,440 dwellings for a 20-year plan period. Our analysis of the allocations indicates the following rates of delivery.

Table 7 Anticipated rates of housing delivery from Proposed Allocations

Timescale	Units	Units
Years 1-5	3,054	
Years 6-10	4,562	
Years 11 to 16	3,868	
Sub-total 16-year plan period		11,484
Years 17 to 21		2,448
Total 21-year period		13,932*

* Does not add to 14,985 as some site delivery extends beyond 2038

2.36 This simple analysis demonstrates that for the 16-year Plan period the housing provision is 5,613 dwellings short of our estimate of the housing requirement of 17,097 dwellings (17,097 – 11,484 = 5,613). For the 5-year period following the Plan period, the shortfall is 1,887 using the Submitted Plan figures ((867x5)-2448) or 2,902 short using our figures ((1070x5)-2,448).

Five Year Supply

2.37 Our analysis above demonstrates that the housing land requirement for the 16-year plan period is significantly flawed. Of equal concern is the lack of supply in the early years of the plan required to “...*significantly boost the supply of housing...*”.

2.38 Our assessment of the 5-year supply is set out in Table 8 below and is in line with generally accepted practice. The steps in our assessment are:

- I. To provide a fair indication of the range of what the 5-year housing land supply position might be, we use both the Council's housing requirement figure of 790 dwellings per annum and our assessment of the annual requirement of 1,070 dwellings per annum to arrive at a five-year requirement.
- II. We then add the undersupply assessed against each of the housing requirement figures for the period of 2012 to 2019. This is known as the "Sedgefield Method" of calculating the 5-year supply and assumes any undersupply is made up in the 5-year calculation period and not spread over the remaining years of the Local Plan. This is the approach favoured by National Planning Guidance which recommends:

The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5-year period (the Sedgefield approach).

Paragraph: 044 Reference ID: 3-044-20180913

- III. The Council has failed the housing delivery test for 6 of the last 7 years when housing delivery has fallen below 85% of the 2017 SHMA requirement (See Table 5 above). In these circumstances, National Planning Policy recommends that a 20% buffer should be added to the housing requirement.
- IV. We take our adjusted calculation of unimplemented permissions of 2,925 (Paragraph 2.57 above).

2.39 Our assessment of 5-year supply is set out in Table 5 below. We provide 2 variants of the 5-year supply:

- In the first calculation, our assessment assumes the supply comprises just the existing commitments. That gives a five-year supply of 1.48 years based on the estimate of an annual housing requirement need of 1,070 dwellings per annum and our assumptions on backlog and commitments.
- The 5-year supply using the Council's housing requirement of 790 and their assumption on backlog, commitments and windfall is 3.39 years.

2.40 In the second calculation we have included our estimate of supply arising from the proposed allocations from Table 7 above:

- Our estimate of supply from allocated sites in the first 5 years of the Plan is 3,045 dwellings. When this is added to the assumptions about the supply from existing commitments and windfalls, the five years supply using the Council figures is 6.48 years and using our figure for commitments, 3.01 years.
- The scale of the deficit in land supply identified by the 5-year calculation is significant not only in terms of the need to identify more land but also in terms of the longevity of undersupply. By any reasonable assessment, there has been a significant shortfall in the provision of housing every year since 2012 and for the period before that.

Table 8: Assessment of 5-year land supply

		Assessment using Councils Housing requirement of 790		Assessment using Government Housing requirement of 1,070	
A	Requirement	(5x790)	3,950	(5x1070)	5,350
B	Plus Shortfall 2012-2017	(7x32)	224		2,902
C	Sub total		4,174		8,252
D	20% buffer	(C x .2)	834.8	(C x .2)	1,650
E	Total 5-year Requirement	C+D	5,009	C+D	9,902
F	Annual requirement	(E ÷ 5)	1,002	(E ÷ 5)	1,980
G	Supply (Commitments)		3,010		2,925
H	Windfall		338		0
I	5-year supply	(G+H) ÷ F	3.34		1.48
J	Allocations Years 1 to 5		3,045		3,045
K	Potential supply	G+H+J	6,393		5,970
L	Potential 5-year supply	(K ÷ F)	6.38		3.01

- 2.41 The calculation above demonstrates the high level of latent and unmet demand in York and the precarious nature of the housing supply in the City. In order to achieve a balance between the housing requirement and housing supply the requirement would have to fall significantly. On the basis of the background evidence prepared for the Local Plan, this scenario is highly unlikely.
- 2.42 Alternatively, the requirement / supply balance could be achieved by increasing the supply for the existing allocated sites in the 5-year period. Again, on the basis of the evidence available this is less likely. This is because a significant proportion of the draft housing allocations are large sites that will take several years before they deliver a significant increase in housing supply and our assumptions already assume a realistic rate of delivery from each site. That rate of delivery is unlikely to increase without a fundamental adjustment to the business model of housebuilders and developers.
- 2.43 Furthermore, adoption of the plan is at least 2 years away, if not more. In the meantime, the only credible source of housing land supply is likely to come sites such as the site south of Cherry Lane that can deliver houses quickly.

3.0 SUMMARY AND SUGGESTED CHANGES TO THE PLAN

3.1 The site south of Cherry Lane is in a highly sustainable location for housing and Shepherd Homes can confirm is available for development in the first 5 years of the plan period.

3.2 There are no overriding technical constraints that would prevent development of the site. The site is not constrained by any nature conservation or other planning designations. In view of the significant shortfall in the 5-year housing supply there is an immediate need to allocate sites that are deliverable with the first five years of the Plan.

Suggested changes to the Plan

3.3 To make the Plan Sound:

- The housing requirement figure for the Plan Period should be increased to at least 1,100 dwellings per annum
- The site at Cherry Lane outlined red on the plan at Appendix I should be allocated to address the shortfall in housing supply.

Appendix I

Outstanding Commitments April 2018

Ward	Parish	SITE NAME	Easting	Northing	Core Strategy Location Zone	Applic. Number	Date permission Granted	Status of Site at 31/03/2018	Expiry Date of Consent	Total Built	Total Capacity	Total Remaining	Net Total Remaining	Type of Housing	Number of Bedrooms	New/ Conv/ COU	Loss of units	GF/BF	Site size (ha)
Rural W	Upper Pop	Grange Farm Hodgson Lane Upper Poppleton	455098	453725	Rural	04/00186/FUL	20/06/2005	Under Construction	N/A	0	6	6	6	6 No town houses	2 x 2 bed, 4 x 3 bed	COU	No	GF	0.216
Dring & Withp		Proposed New Dwelling St Edwards Close	458892	449626	Urban	17/01963/FUL	09/11/2004	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GF	0.550
Mick		All Saints Church North Street	460054	451755	City Centre	05/00048/FUL	20/03/2009	Under Construction	N/A	0	3	3	3	2 No town houses, 1 No flat	1 x 1 bed flat, 2 x 2 bed town houses	New	No	BF	0.161
Hunt & Neston	Huntington	59 The Old Village Huntington	461707	456309	Sub-Urban	05/01581/FUL	21/04/2006	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GF	0.026
Heslington	Heslington	Enclosure Farm Main Street Heslington	462858	450298	Sub-Urban	07/01046/FUL	13/08/2007	Under Construction	N/A	1	3	2	2	1 No detached house, 1 No detached Bungalow	1 x 6 bed det house, 1 x 2 bed det bung	COU	No	BF	0.223
Mick		Moat Hotel Nunnery Lane	459990	451279	Urban	08/01049/FUL	15/07/2008	Under Construction	N/A	3	4	1	1	1 No flats	1 x 2 bed	COU	No	BF	0.069
Strensall	Earswick	Store Adj to 45 The Village Earswick	461673	457200	Small Village	08/02677/FUL	24/03/2009	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	New	No	BF	0.239
Westfield		48 Wetherby Road	456732	451446	Sub-Urban	09/01338/FUL	29/10/2009	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	GDN	0.069
Fisher		4 Derwent Road	460950	449874	Urban	10/00287/FUL	14/05/2010	Under Construction	N/A	1	2	1	1	1 No Semi-detached houses	1 x 3 bed	New	Yes (demolish -1)	BF/GDN	0.050
Strensall	Earswick	4 Willow Grove Earswick	462125	457288	Small Village	10/00297/FUL	10/01/2011	Under Construction	N/A	0	2	2	1	2 No detached bungalows	1 x 3, 1 x 4 bed	New	Yes (demolish -1)	BF/GDN	0.085
Strensall	Stockton on Forest	Stockton Lodge Sandy Lane Stockton on Forest	466396	456849	Small Village	10/00617/FUL	11/03/2013	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.035
Strensall	Stren & To	The Grange Towthorpe Road Haxby	462368	458645	Rural	10/02764/FUL	02/02/2011	Under Construction	N/A	0	1	1	1	1 No town house	1 x 3 bed	COU	No	BF	0.080
Accomb		145 Beckfield Lane	456893	452297	Sub-Urban	11/00454/FUL	27/05/2011	Under Construction	N/A	0	5	5	4	5 No Flats	5 x 1 bed	Conv	Yes -1	BF	0.079
HewWood	HewWood	Rowes Farm Bungalow Stockton Lane	463564	454215	Rural	11/02928/FUL	09/08/2012	Under Construction	N/A	0	2	2	2	2 No town houses	2 x 2 bed	COU	No	GF	0.100
Hunt & Neston	Huntington	Beechwood Beechwood Hopgrove	463789	455565	Rural	11/03113/FUL	26/04/2012	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 5 bed	COU	No	GF	0.093
Strensall	Stockton on Forest	Methodist Chapel The Village Stockton on Forest	465557	455953	Small Village	12/00241/FUL	23/04/2012	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 7 bed	New	No	BF	0.076
Strensall	Stockton on Forest	Chapel Farm 111 The Village Stockton on Forest	465801	456231	Small Village	12/01216/FUL	02/07/2012	Under Construction	N/A	0	1	1	1	1 No town house	1 x 3 bed	COU	No	GF	0.055
Mick		JW Frame (Plumbers) Ltd 9a Smales Street	460068	451439	City Centre	13/00271/FUL	19/04/2013	Under Construction	N/A	0	1	1	1	1 No town house	1 x 2 bed	COU	No	BF	0.006
HewWood		86 Heworth Green	461382	452646	Urban	13/00957/FUL	09/07/2013	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.030
Denwithe	Dunnington	25 Garden Flats Lane Dunnington	467025	452826	Village	16/00337/REM	10/10/2016	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 4 bed	New	No	GDN	0.134
Guilthwaite		Mack & Lawler Builders Ltd 2a Low Ousegate	460245	451681	City Centre	16/02710/ORC	06/03/2017	Not yet started	06/03/2022	0	8	8	8	8 No flats	8 x 2 bed	COU	No	BF	0.022
Strensall	Stockton on Forest	Stockton Lodge Sandy Lane Stockton on Forest	466396	456849	Small Village	13/02626/FUL	17/10/2013	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 5 bed	New	No	GDN	0.039
Accomb		1A Danebury Crescent	457092	451686	Sub-Urban	13/02685/FUL	26/11/2013	Under Construction	N/A	0	2	2	2	2 No detached bungalows	2 x 2 bed	New	No	GDN	0.111
Strensall	Stockton on Forest	Church Farm 84 The Village Stockton on Forest	465681	456066	Small Village	13/02755/FUL	28/03/2014	Under Construction	N/A	1	2	1	1	1 No detached houses	1 x 3 bed	New	No	GF	0.320
HewWood		2a Mill Lane	461249	452623	Urban	13/03153/FUL	18/11/2013	Under Construction	N/A	0	3	3	3	3 No flats	1 x 1 & 2 x 2 bed	New	No	BF	0.024
Bishopthorpe	Bishopthorpe	Manor Farm Bishopthorpe Road	460029	449213	Rural	13/03403/FUL	05/02/2014	Under Construction	N/A	0	1	1	1	1 No town house	1 x 4 bed	COU	No	GF	0.010
Guilthwaite		Bronze Dragon 51 Huntington Road	460908	452879	Urban	13/03573/FUL	17/01/2014	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 1 bed	New	No	BF	0.015
Mick		English Martyrs Church Hall Dalton Terrace	459313	451127	City Centre	13/03595/FUL	15/05/2014	Under Construction	N/A	0	4	4	4	4 No flats	1 x 1 & 3 x 3 bed	New	No	BF	0.027
Clifton		Bert Keech Bowling Club Sycamore Place	459653	452395	Urban	13/03727/FUL	07/01/2016	Not yet started	07/01/2019	0	5	5	5	4 No town houses, 1 No detached house	4 x 5 bed town houses, 1 x 6 bed detached house	New	No	GF	0.222
HewWood	HewWood	QED Books 1 Straylands Grove	461832	453509	Urban	14/00098/FUL	12/03/2014	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	GDN	0.070
Rural W	Copmanthorpe	105 Temple Lane Copmanthorpe	457748	446020	Rural	14/00099/FUL	22/10/2014	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 3 bed	Conv	No	BF	0.170
Strensall	Stren & To	Middleton House 2 Redmayne Square Strensall	463784	461237	Large Village	17/00308/FUL	05/04/2017	Not yet started	05/04/2020	0	1	1	1	1 No detached house	1 x 5 bed	New	No	GDN	0.090
Accomb		1 Wetherby Road	459990	451497	Sub-Urban	14/00511/REM	10/06/2014	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	GDN	0.060
Fulford	Fulford	Raddon House 4 Fenwicks Lane	460846	449312	Sub-Urban	14/00613/FUL	26/11/14	Under Construction	N/A	0	1	1	0	1 No detached house	1 x 5 bed	New	yes (demolish -1)	BF	0.940
Rural W	Upper Pop	37 Station Road Upper Poppleton	455892	453757	Large Village	14/00929/FUL	26/08/2014	Under Construction	N/A	0	1	1	0	1 No detached house	1 x 4 bed	New	Yes (demolish -1)	BF	0.100
Bishopthorpe	Copmanthorpe	Mar-Stan Temple Lane Copmanthorpe	458081	445880	Rural	17/00248/FUL	19/04/2017	Not yet started	19/04/2020	0	1	1	0	1 No detached bungalow	1 x 3 bed	New	yes (demolish -1)	BF	0.170
Skelton	Rawcliffe	Del Monte Skelton Park Trading Estate Skelton	456799	455860	Village	14/01478/OUTM	09/03/2016	Not yet started	09/03/2019	0	60	60	60	Not yet confirmed	Not yet confirmed	New	No	BF	2.290
Westfield		G1 Newbury Avenue	457830	450303	Urban	14/01517/GRG3	08/10/2014	Not yet started	08/10/2017	0	9	9	9	9 No flats	1 x 1, 8 x 2 bed	New	No	BF	0.282

Derwt	Holby	Piker Thorn Farm Bad Bargain Lane	465016	454232	Rural	14/01761/FUL	16/09/2014	Under Construction	N/A	0	1	1	0	1 no detached bungalow	1 x 2 bed	New	Yes (demolish -1)	GDN	0.026
Fisher		1-12 Kensal Rise	460937	450731	Urban	14/01857/FUL	09/01/2015	Not yet started	09/01/2018	0	6	6	6	6 No flats	2 x 1, 4 x 2 bed	Conv	No	BF	0.150
Hax & Wig	Haxby	The Memorial Hall 16 The Village Haxby	460834	458229	Large Village	14/01982/FUL	09/01/2015	Under Construction	N/A	0	3	3	3	3 No town houses	3 x 2 bed	New	No	BF	0.050
Raw & Cliff	Rawcliffe	North Lodge Clifton Park Avenue	458481	453848	Sub-Urban	16/01173/FULM	02/12/2016	Under Construction	N/A	0	14	14	14	14 No flats	2 x 1, 12 x 2 bed	New	No	BF	0.127
Guilhi		1 Paver Lane	460893	451554	City Centre	17/01637/FUL	15/09/2017	Under Construction	N/A	0	2	2	2	2 No town houses	1 x 1, 1 x 2 bed	COU	No	BF	0.020
Dring & Wthp		306 Tadcaster Road	458910	450128	Urban	14/02074/FUL	15/09/2016	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 2 bed	Conv	No	BF	0.040
Wheldrake	Wheldrake	Wheldrake Hall Farm 6 Church Lane Wheldrake	468350	444879	Rural	17/00636/ABC	15/05/2017	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	COU	No	GF	0.040
Bishopthorpe	Bishopthorpe	Site of Ferry Cottage 6 Ferry Lane Bishopthorpe	459846	447665	Rural	17/02304/FUL	06/02/2018	Not yet started	06/02/2021	0	1	1	0	1 No detached house	1 x 3 bed	New	Yes (demolish -1)	BF	0.214
Rural W	Nether Poppleton	Barn South of Greystones Church Lane Nether Poppleton	456327	454999	Large Village	14/02531/FUL	08/01/2015	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	Conv	No	BF	0.380
Mick		Villa Italia 69 Micklegate	459918	451604	City Centre	14/02546/FUL	13/11/2015	Under Construction	N/A	0	4	4	4	3 No flats, 1 No detached house	2 x 1, 1 x 2 bed flats, 1 x 2 bed detached house	COU/New	No	BF	0.020
Bishopthorpe	Bishopthorpe	Manor Farm Bishopthorpe Road	460029	449213	Rural	14/02859/ABC3	05/02/2015	Under Construction	N/A	0	1	1	1	1 No town house	1 x 3 bed	COU	No	GF	0.010
Strensall	Earswick	OS Field 2424 Wisker Lane Earswick	463262	457225	Rural	15/00060/ABC3	04/03/2015	Not yet started	04/03/2020	0	3	3	3	3 No town houses	3 x 2 bed	COU	No	GF	0.100
Holgate		Gateway 2 Holgate Park Drive	458515	451715	City Centre Ext 1	15/00150/ORC	17/03/2015	Not yet started	17/03/2020	0	0	0	0	TBA	TBA	COU	No	BF	0.272
Westfield		Co-op 47 York Road Accomb	457658	451434	Urban	15/00238/FUL	02/07/2015	Under Construction	N/A	0	1	1	1	1 No flat	1 x 1 bed	COU	No	BF	0.013
Heworth		First Floor Flat 126 Haxby Road	460604	453218	Urban	15/00254/FUL	07/04/2015	Under Construction	N/A	0	1	1	1	1 No flat	1 x 2 bed	COU	No	BF	0.015
Strensall	Stren & Tolson	Middleton House 2 Redmayne Square Strensall	463779	461250	Large Village	15/00362/FUL	29/05/2015	Not yet started	29/05/2018	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.040
Holgate		Direct Workwear 158 Poppleton Road	458152	452144	Urban	15/00385/FUL	23/04/2015	Not yet started	23/04/2018	0	1	1	1	1 No flat	1 x 1 bed	COU	No	BF	0.006
Hax & Wig	Wigginton	OS Field 0005 Sutton Road Wigginton	459033	460295	Rural	15/00449/FUL	14/05/2015	Under Construction	N/A	0	1	1	0	1 No detached bungalow	1 x 3 bed	New	Yes (demolish -1)	BF	0.070
Holgate		Orchard House 8 Hamilton Drive East	458913	451166	Urban	15/00561/FUL	28/05/2015	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 2 bed	New	No	GDN	0.087
Wheldrake	Elvington	The Barn Dauby Lane Elvington	469492	448599	Rural	15/00638/ABC3	19/05/2015	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 3 bed	COU	No	GF	0.010
Fisher		Friars Rest Guest House 81 Fulford Road	460840	450812	Urban	15/00677/FUL	17/06/2015	Not yet started	17/06/2018	0	1	1	1	1 No town house	1 x 5+ bed	COU	No	BF	0.020
Skelt	Rawcliffe	11A Rosecroft Way	458395	453912	Sub-Urban	15/00708/FUL	16/09/2015	Not yet started	16/09/2018	0	1	1	1	1 No town house	1 x 3 bed	New	No	GDN	0.069
Dring & Wthp		257 Thanet Road	457888	450042	Urban	15/00709/FUL	29/05/2015	Not yet started	29/05/2018	0	1	1	1	1 No detached Bungalow	1 x 3 bed	New	No	GDN	0.016
Rural W	Askham Bryan	107 Main Street Askham Bryan	455114	448357	Small Village	15/00889/FUL	24/06/2015	Under Construction	N/A	0	1	1	0	1 No detached house	1 x 4 bed	New	Yes (demolish -1)	BF	0.100
Wheldrake	Naburn	Pear Tree Cottage	459857	445562	Small Village	15/01037/FUL	22/10/2015	Under Construction	N/A	0	1	1	0	1 No detached house	1 x 4 bed	New	Yes -1	BF	0.077
Mick		7 Charlton Street	460204	450903	Urban	15/01083/FUL	28/07/2015	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 1 bed	New	No	GDN	0.010
Strensall	Earswick	6 Willow Grove Earswick	462140	457288	Small Village	15/01152/FUL	10/12/2015	Not yet started	10/12/2018	0	2	2	1	2 No detached bungalows	2 x 3 bed	New	Yes	GDN	0.126
Guilhi		88 Bootham	459810	452422	City Centre	15/01157/FUL	16/10/2015	Not yet started	16/10/2018	0	1	1	1	1 No detached house	1 x 3 bed	New	No	BF	0.040
Mick		4 Scarcroft Lane	459825	451211	Urban	17/01722/FUL	22/09/2017	Not yet started	22/09/2020	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.012
Heworth		York House 62 Heworth Green	461328	452681	Urban	15/01196/FUL	10/08/2015	Not yet started	10/08/2018	0	3	3	2	3 No flats	1 x 2, 2 x 3 bed	COU/Conv	Yes -1	BF	0.076
Accomb		Site to R/O 1-3 Backfield Lane	459912	451585	Sub-Urban	16/02269/FULM	18/10/2017 Won on appeal	Under Construction	N/A	0	11	11	11	No semi-detached bungalows, 1 No detached bungalow	town houses, 2 x 3 bed semi-detached bungalows, 1 x 3 bed detached bungalow	New	No	GDN	0.270
Heworth		Former Londons 31a Hawthorne Grove	461290	452513	Urban	17/00088/FULM	31/07/2017	Under Construction	N/A	0	10	10	10	10 No flats	8 x 1, 2 x 2 bed	COU	No	BF	0.070
Wheldrake	Elvington	Oak Trees Elvington Lane Elvington	468469	448239	Rural	17/01376/REM	16/08/2017	Not yet started	16/08/2019	0	1	1	1	1 No detached bungalow	1 x 4 bed	New	No	BF	0.780
Hunt & New	New Earswick	Land to North and West of 41 & 43 Park Avenue New Earswick	460636	456038	Sub-Urban	15/01390/FUL	11/02/2016	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GF	0.115
Hax & Wig	Haxby	Vacant Land South of 39 Sandringham Close Haxby	460281	457055	Large Village	17/00614/FUL	16/06/2017	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	GF	0.043
Hax & Wig	Wigginton	Wigginton Grange Farm Corban Lane Wigginton	458978	458765	Rural	15/01441/FUL	07/09/2015	Under Construction	N/A	0	1	1	0	1 No detached house	1 x 6 bed	New	Yes (demolish -1)	BF	0.013
Strensall	Stockton	Church Farm 84 The Village Stockton on Forest	465681	456066	Small Village	15/01446/FUL	25/02/2016	Under Construction	N/A	0	3	3	3	3 No detached houses	1 x 3, 2 x 4 bed	New	No	GF	0.170
Guilhi		6 Peckitt Street	460362	451464	City Centre	15/01447/FUL	14/09/2015	Not yet started	14/09/2018	0	1	1	1	1 No town house	1 x 4 bed	COU	No	BF	0.010
Guilhi		Barry Crux 20 Castlegate	460414	451605	City Centre	15/01522/FUL	22/01/2016	Not yet started	20/01/2019	0	2	2	2	2 No flats	1 x 1, 1 x 2 bed	COU	No	BF	0.023
Westfield		Beau & Joli Ltd 1st & 2nd Floors 43 York Road Accomb	457670	451437	Urban	15/01578/RFP	10/09/2015	Not yet started	10/09/2020	0	1	1	1	1 No flat	1 x 2 bed	COU	No	BF	0.018

Hax & Wig	Haxby	14 The Avenue Haxby	461016	457701	Large Village	15/01598/FUL	06/11/2015	Not yet started	06/11/2018	0	1	1	1	1 No detached house	1 x 2 bed	New	No	GDN	0.026
Guilhi		Site to Rear of 22a Huntington Road	460940	452668	Urban	15/01752/FUL	02/10/2015	Not yet started	02/10/2018	0	2	2	2	2 No semi-detached houses	2 x 2 bed	New	No	BF	0.020
Rural W	Rufforth &	Land to East of Orchard Vale Wetherby Road Rufforth	452908	451529	Small Village	15/01808/FUL	11/12/2015	Not yet started	11/12/2018	0	1	1	1	1 No detached house	1 x 5 bed	New	No	GF	0.085
Copmanthorpe	Copmanthorpe	Station Cottages Station Road Copmanthorpe	456668	446507	Village	15/01886/FUL	18/05/2016	Not yet started	18/05/2019	0	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	GDN	0.050
Strensall	Stren & To	42 Middlecroft Drive Strensall	462878	460386	Large Village	15/01895/FUL	08/03/2016	Not yet started	08/03/2019	0	1	1	1	1 No semi-detached house	1 x 2 bed	New	No	GDN	0.012
Guilhi		Fire Station 18 Clifford Street	460360	451493	City Centre	15/02155/FULM	02/09/2016	Under Construction	N/A	0	14	14	14	7 No town houses, 7 No flats	5 x 2, 2 x 3 bed flats, 7 x 4 bed town houses	New	No	BF	0.140
Mick		Car Parking Area Holgate Road	459499	451253	City Centre	15/02295/FUL	01/03/2016	Not yet started	01/03/2019	0	6	6	6	6 No flats	6 x 1 bed	New	No	BF	0.032
Fulford & Heslington		24 Main Street Heslington	462856	450204	Sub-Urban	15/02532/FUL	23/05/2016	Under Construction	N/A	0	1	1	-1	1 No town house	1 x 6 bed	Conv	Yes -1	BF	0.057
Clifton		St Marys Hotel 16-17 Longfield Terrace	459633	452211	Urban	15/02544/FUL	05/01/2016	Not yet started	05/01/2019	0	2	2	2	2 No town houses	1 x 3, 1 x 4 bed	COU	No	BF	0.025
Mick		5 Cherry Hill Lane	460279	451139	Urban	15/02576/FUL	23/03/2016	Not yet started	23/03/2019	0	2	2	1	2 No semi-detached bungalows	2 x 1 bed	Conv	Yes -1	BF	0.019
Hunt & Neighbourhood	Huntington	2 Meadow Way Huntington	461903	455735	Sub-Urban	15/02617/FUL	16/02/2016	Not yet started	16/02/2019	0	1	1	1	1 No detached bungalow	1 x 2 bed	New	No	GDN	0.025
Heworth Without		206 Stockton Lane	462421	453266	Sub-Urban	15/02624/FUL	11/03/2016	Not yet started	11/03/2019	0	4	4	4	3 No detached houses, 1 No detached bungalow	all 4 bed properties	New	No	GDN	0.190
Osbaldwick	Osbaldwick	15 Murton Way	463657	451931	Sub-Urban	15/02650/FUL	20/05/2016	Not yet started	20/05/2019	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.070
Fisher		Melbourne Hotel 6 Cemetery Road	460935	450963	Urban	15/02739/FUL	01/04/2016	Under Construction	N/A	0	6	6	6	4 No flats, 2 No town houses	1 x 1 & 3 x 2 bed flats, 2 x 3 bed town houses	COU/New	No	BF	0.036
Guilhi		Macdonalds 19-22 Fossgate	460567	451766	City Centre	15/02760/FUL	05/02/2016	Under Construction	N/A	0	5	5	5	1 No flat, 4 No town houses	1 x 1 bed flat, 1 x 2 & 3 x 3 bed town houses	COU	No	BF	0.116
Guilhi		Colin Hicks Motors Garage & Yard to R/O 33 Bootham	460061	452367	City Centre	17/01546/FUL	23/01/2018	Not yet started	23/01/2021	0	14	14	14	14 No flats	13 x 1, 1 x 2 bed	New	No	BF	0.050
Osb & Dunnington	Dunnington	8 Petercroft Lane Dunnington	467161	452737	Village	15/02813/FUL	06/05/2016	Not yet started	06/05/2019	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.031
Acomb		4 Jorvik Close	457082	452286	Sub-Urban	15/02825/FUL	16/06/2016	Under Construction	N/A	0	1	1	1	1 No town house	1 x 3 bed	New	No	GDN	0.017
Strensall	Earswick	Fossbank Boarding Kennels Strensall Road	461850	457772	Rural	16/02792/OUT	07/02/2017	Not yet started	07/02/2020	0	4	4	4	4 no detached houses	2 x 3, 2 x 5 bed	New	No	BF	0.320
Heworth		Wall to Wall Ltd 71 East Parade	461494	452574	Urban	15/02878/FUL	02/03/2016	Not yet started	02/03/2019	0	1	1	1	1 No detached bungalow	1 x 2 bed	COU	No	BF	0.016
Raw & Cliff	Rawcliffe	Site to Side of 2 Holyrood Drive fronting onto Manor Lane	457981	455023	Sub-Urban	16/02230/FUL	20/12/2016	Under Construction	N/A	0	4	4	4	4 No semi-detached houses	4 x 3 bed	New	No	GF	0.084
Mick		Hudson House Toft Green	459759	451619	City Centre	17/00576/FULM	23/08/2017	Under Construction	N/A	0	127	127	127	127 No Flats	49 x 1, 73 x 3, 5 x 3 bed	New	No	BF	0.550
Mick		23 Nunnery Lane	459930	451281	Urban	16/00123/FUL	23/03/2016	Under Construction	N/A	0	1	1	1	1 No flat	1 x 2 bed	COU	No	BF	0.009
Mick		14 Priory Street	459883	451464	City Centre	16/00261/FUL	17/05/2016	Under Construction	N/A	0	2	2	1	2 no flats	1 x 2, 1 x 3 bed	Conv	Yes -1	BF	0.011
Guilhi		Marygate Orthodontic Practice 64 Marygate	459784	452144	City Centre	16/00500/FUL	03/05/2016	Not yet started	03/05/2019	0	1	1	1	1 No town house	1 x 4 bed	COU	No	BF	0.016
Strensall	Stockton on the Park	Carlton Cottage Old Carlton Farm Common Lane Warthill	467176	456592	Rural	16/02604/FUL	04/01/2017	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 2 bed	Conv	No	BF	0.070
Guilhi		36 Clarence Street	460295	452670	Urban	16/00799/FUL	16/06/2016	Under Construction	N/A	0	4	4	4	4 No flats	4 x 1 bed	New	No	GDN	0.011
Mick		Newington Hotel 147 Mount Vale	459252	450772	Urban	16/00833/FUL	14/06/2016	Under Construction	N/A	0	7	7	7	7 No town houses	2 x 2, 1 x 3, 2 x 4, 2 x 5 bed	COU/New	No	BF	0.204
Dring & Whyp		Land Between 8 & 12 White House Gardens	459039	450518	Urban	16/00870/FUL	08/07/2016	Not yet started	08/07/2019	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.045
Osbaldwick	Kexby	Woodhouse Farm Dauby Lane Kexby	468905	449631	Rural	16/02558/FUL	16/01/2017	Under Construction	N/A	0	1	1	1	1 No semi-detached bungalow	1 x 3 bed	Conv	No	BF	0.086
Hull Rd		47 Osbaldwick lane	462683	451621	Urban	16/00988/FUL	29/07/2016	Not yet started	29/07/2019	0	1	1	1	1 No town house	1 x 2 bed	New	No	GDN	0.015
Mick		2 Culance Walk	459982	451232	Urban	16/01011/FUL	19/09/2016	Under Construction	N/A	0	4	4	2	4 No flats	4 x 1 bed	Conv	Yes -2	BF	0.020
Westfield		Mustelgear Ltd 43 Front Street Acomb	457306	451280	Sub-Urban	16/01014/FUL	21/06/2016	Not yet started	21/06/2019	0	2	2	2	2 No flats	2 x 1 bed	New	No	BF	0.016
Guilhi		Stonebow House The Stonebow	460548	451853	City Centre	16/01003/FUL	10/10/2016	Under Construction	N/A	0	5	5	5	5 No flats	1 x 1, 4 x 3 bed	COU	No	BF	0.173
Guilhi		Stonebow House The Stonebow	460548	451853	City Centre	16/01018/ORC	17/06/2016	Under Construction	N/A	0	15	15	15	15 No flats (indicative)	5 x 1, 7 x 2, 3 x 3 bed (indicative)	COU	No	BF	0.173
Heworth W/HewW		306 Stockton Lane	462930	453578	Sub-Urban	16/01154/FUL	26/09/2016	Not yet started	N/A	0	1	1	1	1 no detached bungalow	1 x 2 bed	New	No	GDN	0.025
Guilhi		Crook Lodge 26 St Marys	459732	452301	City Centre	16/01177/FUL	30/06/2016	Not yet started	30/06/2019	0	1	1	1	1 No town house	1 x 7 bed	COU	No	BF	0.028
Copmanthorpe	Copmanthorpe	134 Temple Lane Copmanthorpe	457935	445895	Rural	16/01185/FUL	08/07/2016	Under Construction	N/A	0	2	2	2	2 No semi-detached houses	2 x 1 bed	Conv	No	BF	0.100
Fisher		Flat 1 8 Wenlock Terrace	460788	450439	Urban	16/01188/FUL	05/07/2016	Not yet started	05/07/2019	0	9	9	4	9 No flats	9 x 1 bed	Conv	Yes -5	BF	0.020
Strensall	Stren & To	The Firs Lords Moor Lane Strensall	463846	460870	Large Village	16/01239/REM	20/07/2016	Under Construction	N/A	0	1	1	1	1 No detachedhouse	1 x 4 bed	New	No	GDN	0.117
Guilhi		Herbert Todd & Son Percys Lane	460925	451611	City Centre	16/01263/FULM	26/08/2016	Under Construction	N/A	0	38	38	38	26 No Flats 12 No Town Houses	20 x 1, 6 x 3 bed flats, 4 x 5, 8 x 6 bed town houses	New	No	BF	0.160

Rural W	Rufforth &	Rufforth Aerodrome Bradley Lane Rufforth	453699	450614	Rural	16/01303/REM	02/08/2016	Not yet started	20/05/2019	0	1	1	1	1	1 No detached house	1 x 4 bed *not yet confirmed	New	No	GF	0.010
Accomb		23 The Green Accomb	457158	451396	Sub-Urban	16/01306/FUL	03/08/2016	Under Construction	N/A	0	1	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.050
Wheldrake	Deighton	Ackroyds Restaurant Meats Deighton	462444	445659	Rural	16/01318/FUL	12/08/2016	Not yet started	12/08/2019	0	1	1	1	1	1 No detached house	1 x 5 bed	COU	No	BF	0.150
Wheldrake	Wheldrake	Garth Cottage 8 Church Lane Wheldrake	468373	444973	Small Village	16/01353/FUL	01/09/2016	Under Construction	N/A	0	1	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.019
Guilhl		Unidec Systems Ltd Manor Chambers 26a marygate	459900	452257	City Centre	16/01428/ORC	23/09/2016	Not yet started	23/09/2021	0	3	3	3	3	3 No flats	3 x 2 bed	COU	No	BF	0.037
Heworth		140 Fourth Avenue	462132	452243	Urban	16/01459/FUL	17/08/2016	Not yet started	17/08/2019	0	1	1	1	1	1 no town house	1 x 3 bed	New	No	GDN	0.027
Guilhl		Garage Court Agar Street	460799	452375	City Centre	16/01469/FUL	10/08/2016	Under Construction	N/A	0	3	3	3	3	3 No town houses	3 x 2 bed	New	No	BF	0.074
Westfild		Accomb Jewellers 10 Accomb Court Front Street	457516	451411	Sub-Urban	16/01497/FUL	24/08/2016	Not yet started	24/08/2019	0	1	1	1	1	1 No flat	1 x 1 bed	COU	No	BF	0.003
HewW	HewW	440 Malton Road	463554	454909	Rural	16/01622/FUL	21/09/2016	Not yet started	21/09/2019	0	1	1	0	0	1 No detached House	1 x 4 bed	New	Yes (demolish -1)	BF	0.115
Heworth		People Energies Ltd 106 Heworth Green	461517	452748	Urban	16/01625/ORC	16/09/2016	Not yet started	16/09/2021	0	1	1	1	1	1 No semi-detached house	1 x 4 bed	COU	No	BF	0.068
Dring & Wthp		2 Farmanids Road	457795	449720	Sub-Urban	16/01719/FUL	13/09/2016	Under Construction	N/A	0	1	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.024
Dring & Wthp		13 Highmoor Road	457742	449878	Sub-Urban	16/01265/FUL	02/11/2016	Under Construction	N/A	0	1	1	1	1	1 No Detached house	1 x 3 bed	New	No	GDN	0.020
Copmanthorpe	Copmanthorpe	Land to R/O 9-11 Tadcaster Road Copmanthorpe	456904	447499	Village	16/01673/FUL	04/11/2016	Under Construction	N/A	0	4	4	4	4	4 no detached houses	2 x 4, 2 x 5 bed	New	No	GDN	0.370
Mick		211 Bishopthorpe Road	460041	450149	Sub-Urban	15/00820/FUL	15/11/2016	Under Construction	N/A	0	1	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.017
Westfild		36 Danesfort Avenue	457551	450682	Sub-Urban	16/01496/FUL	15/11/2016	Under Construction	N/A	0	1	1	1	1	1 No town house	1 x 2 bed	New	No	GDN	0.014
Bishopthorpe	Bishopthorpe	3 Beech Avenue Bishopthorpe	459213	447343	Village	17/00817/FUL	01/06/2017	Not yet started	01/06/2020	0	2	2	2	2	2 No semi-detached houses	2 x 2 bed	New	Yes (demolish -1)	GDN	0.043
Rural W	Upper Pop	Crossfields Main Street Upper Poppleton	455611	454584	Large Village	16/01181/FUL	02/06/2017	Under Construction	N/A	0	3	3	2	2	3 No detached houses	2 x 5, 1 x 6 bed	New	Yes (demolish -1)	GDN	0.154
Clifton		12 Water End	459197	452993	Urban	15/00405/FUL	02/12/2016	Not yet started	02/12/2019	0	1	1	1	1	1 No detached bungalow	1 x 2 bed	New	No	GDN	0.060
Guilhl		26-30 Swingate	460384	451954	City Centre	16/01532/FUL	07/10/2016	Not yet started	07/10/2019	0	8	8	8	8	8 No flats	3 x 1, 5 x 2 bed	COU	No	BF	0.058
Holgate		128 Accomb Road	458099	451433	Urban	16/00680/FUL	04/11/2016	Under Construction	N/A	0	10	10	10	10	10 No flats	6 x 1, 4 x 2 bed	COU/S	No	BF	0.042
Guilhl		51 Huntingdon Road	460923	452849	Urban	16/01835/FUL	04/11/2016	Not yet started	04/11/2019	0	1	1	1	1	1 No town house	1 x 3 bed	New	No	BF	0.018
Rural W	Askham Bryan	Brackenhill Askham Bryan Lane Askham Bryan	456117	449308	Rural	18/00061/FUL	28/03/2018	Not yet started	28/03/2021	0	1	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	BF	0.140
Guilhl		Ryedale House 58-60 Piccadilly	460639	451481	City Centre	18/00103/ORC	15/03/2018	Not yet started	15/03/2023	0	79	79	79	79	79 No flats	12 x 1, 51 x 2, 16 x 3 bed	COU	No	BF	0.240
Strensall	Stockton on Forest	Sandburn Farm Malton Road Stockton on Forest	466473	459174	Rural	16/02305/ABC3	15/12/2016	Not yet started	16/12/2021	0	2	2	2	2	2 No detached houses	1 x 3, 1 x 5 bed	COU	No	GF	0.140
Rural W	Hessay	Giebe farm Hessay to Moor Bridge Hessay	451559	453294	Rural	16/02202/FUL	28/11/2016	Not yet started	28/11/2019	0	2	2	2	2	2 No semi-detached houses	2 x 3 bed	New	No	GF	0.120
Rural W	Upper Pop	Dutton Farm Boroughbridge Road	453611	453981	Rural	17/00501/FUL	2017 Won on a	Not yet started	20/11/2020	0	1	1	1	1	1 No detached house	1 x 5 bed	New	No	GF	0.900
Osbaldwick	Dunnington	The Barns Manor Farm Elvington Lane Dunnington	465308	451422	Rural	17/01478/FUL	16/08/2017	Under Construction	N/A	1	3	2	2	2	2 No town houses	2 x 4 bed	COU	No	GF	0.150
Hunt & New Earswick	New Earswick	Land to South of 41 Park Avenue New Earswick	460655	456028	Sub-Urban	17/00200/FUL	25/07/2017	Not yet started	25/07/2020	0	1	1	1	1	1 No detached house	1 x 3 bed	New	No	GF	0.049
Guilhl		Santader 19 Market Street	460340	451795	City Centre	16/01940/FUL	01/12/2016	Not yet started	01/12/2019	0	1	1	1	1	1 No flat	1 x 2 bed	COU	No	BF	0.013
Guilhl		Rowntree Wharf Navigation Road	460835	451729	City Centre	17/01888/FUL	06/12/2016	Under Construction	N/A	28	39	11	11	11	11 No flats	11 x 1 bed	COU	No	BF	0.475
Guilhl		Rowntree Wharf Navigation Road	460835	451729	City Centre	17/01905/FULM	04/12/2017	Under Construction	N/A	0	14	14	14	14	14 No flats	14 x 1 bed	COU	No	BF	
Guilhl		Granville House 21 Granville Terrace	461386	451468	City Centre Ext2	16/02152/FUL	01/12/2016	Under Construction	N/A	0	3	3	3	3	3 No flats	2 x 1, 1 x 2 bed flats	Conv	No	BF	0.015
Guilhl		The Art Shack 4-6 Gilgate	460126	452280	City Centre	15/02517/FUL	08/12/2016	Not yet started	08/12/2019	0	4	4	3	4	4 No flats	2 x 1, 2 x 2 bed	COU/Conv	Yes -1	BF	0.037
Hax & Wig Haxby	Haxby	107 York Road Haxby	460841	457472	Large Village	16/01374/FUL	06/01/2017	Under Construction	N/A	0	1	1	0	0	1 No detached house	1 x 3 bed	New	Yes (demolish -1)	BF	0.100
Fulford & H Fulford	Fulford	Fishergate County Garage 14 Heslington Lane	460996	449432	Sub-Urban	16/02665/FUL	16/01/2017	Under Construction	N/A	0	1	1	1	1	1 No town house	1 x 4 bed	COU	No	BF	0.022
Wheldrake	Deighton	Springwell Main Street Deighton	462665	444348	Small Village	16/02831/FUL	03/03/2017	Under Construction	N/A	0	1	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	GDN	0.075
Strensall	Earswick	Land Between 121 and 125 Strensall Road	462005	457068	Small Village	15/02950/FUL	06/03/2017	Not yet started	06/03/2020	0	1	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.028
Hunt & New Earswick	New Earswick	39 Park Avenue New Earswick	460678	456048	Sub-Urban	16/01871/FUL	07/03/2017	Under Construction	N/A	0	1	1	1	1	1 No detached bungalow	1 x 2 bed	New	No	GDN	0.032
Bishopthorpe	Bishopthorpe	84 Montague Road Bishopthorpe	459437	447291	Village	16/02861/FUL	08/03/2017	Not yet started	08/03/2020	0	1	1	1	1	1 No detached bungalow	1 x 4 bed	New	No	GDN	0.030
HewW		Garden to R/O 79-85 Stockton Lane	462161	453428	Urban	16/02923/FUL	11/08/2017	Not yet started	11/08/2020	0	9	9	9	9	7 No detached houses, 2 No detached bungalows	2 x 2 bed detached bungalows, 2 x 3, 3 x 3 & 2 x 5 bed detached houses	New	No	GDN	0.590
Raw & Clifton Wh	Clifton Wh	Proposed Development Site at Clifton Technology Centre	459049	454891	Sub-Urban	16/01533/FUL	18/01/2017	Under Construction	N/A	0	3	3	3	3	3 No town houses	3 x 2 bed	New	No	BF	0.037

Guilhi		Coal Yard 11 Mansfield Street	460990	452131	City Centre Ext 2	17/02702/FULM	15/03/2018	Not yet started	15/03/2021	0	23	23	23	23 No Flats (Clusters)	7 x 1, 3 x 5, 13 x 6 bed	New	No	BF	0.156
Mick		Oliver House Bishophill Junior	459974	451417	City Centre	15/02645/FULM	25/11/2016	Under Construction	N/A	0	34	34	34	34 No flats	5 x 1, 29 x 2 bed	New	No	BF	0.196
Guilhi		G&G Fisheries 64 Clarence Street	460317	452711	Urban	16/01960/FUL	27/01/2017	Under Construction	N/A	0	3	3	2	3 No flats	3 x 1 bed	Conv/New	Yes-1	BF	0.019
Raw & Clift W		The Diocese of York Diocese House Aviator Court	458850	455060	Sub-Urban	17/00083/ORC	17/03/2017	Under Construction	N/A	8	25	17	17	17 No flats	7 x 1, 10 x 2 bed	COU	No	BF	0.350
Hunt & Nel	Huntington	Guilford Construction Ltd 10 Roland Court Huntington	461314	455121	Sub-Urban	16/02747/ORC	28/04/2017	Not yet started	24/04/2022	0	2	2	2	2 No flats	1 x 1, 1 x 2 bed * not confirmed	COU	No	BF	0.007
Raw & Clift Clifton W		British Red Cross 5-6 Marsden Park	459182	454846	Sub-Urban	17/01075/ORC	07/07/2017	Under Construction	N/A	0	4	4	4	4 No flats	TBA	COU	No	BF	0.032
Mick		95-97 Micklegate	459832	451541	City Centre	17/02625/FUL	12/02/2018	Under Construction	N/A	0	6	6	5	6 No flats	2 x 1, 4 x 2 bed	Conv/New	Yes -1	BF	0.023
Hunt & Nel	Huntington	Sunny Lands North Lane Huntington	464324	456410	Rural	16/01561/FUL	03/04/2017	Not yet started	03/04/2020	0	1	1	0	1 No detached house	1 x 4 bed	New	Yes (demolish -1)	BF	0.189
Fulford & H	Heslington	Pool Bridge Farm Wheldrake Lane Cockey Hill	464121	446360	Rural	17/00411/OUT	19/05/2017	Not yet started	19/05/2020	0	1	1	1	1 No detached house	1 x 2 bed	COU	No	GF	0.055
Hunt & Nel	Huntington	25 New Lane Huntington	461804	455516	Sub-Urban	15/02677/FUL	27/06/2017	Not yet started	27/06/2020	0	5	5	5	5 No detached houses	2 x 3 bed, 3 x 4 bed	COU/New	No	GF	0.280
Osbaldwick	Dunnington	Lodge Farm Hull Road Dunnington	468309	451491	Rural	17/01088/FUL	04/07/2017	Not yet started	04/07/2020	0	3	3	3	2 No detached houses, 1 No detached bungalow	2 x 4 bed detached houses, 1 x 2 bed detached bungalow	COU	No	GF	0.481
Clifton		St Raphael Guest House 44 Queen Anne's Road	459724	452497	Urban	17/00331/FUL	04/04/2017	Not yet started	04/04/2020	0	1	1	1	1 No town house	1 x 5+ bed	COU	No	BF	0.013
Copmanthorpe	Copmanthorpe	27 Horseman Lane Copmanthorpe	456403	447226	Village	17/00055/FUL	06/04/2017	Under Construction	N/A	0	1	1	0	1 no detached house	1 x 4 bed	New	Yes (demolish -1)	BF	0.083
Rural W	Askham Bryan	110 Main Street Askham Bryan	454943	448369	Small Village	17/00718/FUL	25/05/2017	Not yet started	25/05/2020	0	1	1	0	1 No detached house	1 x 5 bed	New	Yes (demolish -1)	BF	0.205
Guilhi		Pizza Hut Ltd 10 Pavement	460479	451774	City Centre	17/00835/FUL	09/06/2017	Not yet started	09/06/2020	0	8	8	8	8 No flats	8 x 1 bed	COU	No	BF	0.029
Raw & Clift Clifton W		Buildmark House George Cayley Drive	459205	454817	Sub-Urban	17/00732/FUL	09/06/2017	Not yet started	09/06/2020	0	8	8	8	8 No flats	4 x 1, 4 x 2 bed	New	No	BF	0.113
Clifton		24 Filey Terrace	460122	453206	Urban	17/00909/FUL	13/06/2017	Under Construction	N/A	0	2	2	1	2 No flats	1 x 1, 1 x 2 bed	Conv	Yes -1	BF	0.008
Dring & Wthp		Aldersyde House Aldersyde	458345	449101	Sub-Urban	16/02511/FUL	14/06/2017	Not yet started	14/06/2020	0	2	2	2	2 No town houses	2 x 2 bed	Conv	Yes -1	BF	0.062
Guilhi		Hill Giftware Ltd 46 Goodramgate	460462	452098	City Centre	17/00321/FUL	19/06/2017	Not yet started	19/06/2020	0	1	1	1	1 No flat	1 x 3 bed	COU	No	BF	0.008
Fisher		134 Lawrence Street	461610	451316	City Centre Ext 2	17/01045/FUL	20/06/2017	Not yet started	20/06/2020	0	2	2	2	2 No flats	2 x 2 bed	Conv	No	BF	0.027
Dring & Wthp		5 Mayfield Grove	458745	449814	Urban	16/00725/FUL	11/07/2017	Not yet started	11/07/2020	0	3	3	2	2 No semi-detached houses, 1 No detached bungalow	2 x 3 bed semi-detached houses and 1 x 2 bed detached bungalow	New	Yes (demolish -1)	GDN	0.061
Westfild		61a Gale Lane	457284	450825	Sub-Urban	17/00555/FUL	31/08/2017	Not yet started	31/08/2020	0	7	7	6	5 No flats, 2 No semi-detached bungalows	5 x 1 bed flats, 2 x 2 bed semi-detached bungalows	New	Yes (demolish -1)	GDN	0.094
Dring & Wthp		11 Highmoor Road	457759	449850	Sub-Urban	17/01435/FUL	18/08/2017	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 2 bed	New	No	GDN	0.019
Strensall	Stockton on Forest	Laurel House The Village Stockton on Forest	465629	455898	Small Village	17/00726/FUL	29/09/2017	Not yet started	29/09/2020	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.111
Hax & Wig	Haxby	87 Greenshaw Drive Haxby	460547	457924	Large Village	17/01697/FUL	06/10/2017	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.021
Guilhi		Hilary House St Saviours Place	460665	451993	City Centre	16/00701/FUL	22/06/2017	Not yet started	22/06/2020	0	1	1	1	1 No flat	1 x 3 bed	Conv	No	BF	0.110
Mick		198 Mount Vale	459193	450768	Urban	17/00716/FUL	30/06/2017	Not yet started	30/06/2020	0	1	1	1	1 No flat	1 x 1 bed	Conv	No	BF	0.010
Fulford & H	Fulford	Cemetery Lodge Fordlands Road	461279	448653	Rural	17/00861/FUL	25/07/2017	Not yet started	25/07/2020	0	1	1	0	1 No flat	1 x 1 bed	COU/Conv	No	BF	0.050
Guilhi		G&G Fisheries 64 Clarence Street	460335	452740	Urban	17/01237/FUL	26/07/2017	Under Construction	N/A	0	2	2	2	2 No flats	2 x 1 bed	New	No	BF	0.010
Wheldrake	Elvington	Home Lea Elvington Lane Elvington	467908	448792	Rural	17/00712/FUL	18/08/2017	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 2 bed	COU	No	BF	0.075
Clifton		Bedingham & Co 1b Newborough Street	459965	452903	Urban	17/01600/FUL	25/08/2017	Not yet started	25/08/2020	0	2	2	2	2 No flats	2 x 1 bed	COU	No	BF	0.014
Strensall	Stockton on Forest	Garage at 30 The Limes Stockton on Forest	465422	455752	Small Village	17/01418/FUL	25/08/2017	Not yet started	25/08/2020	0	1	1	1	1 No detached bungalow	1 x 2 bed	New	No	BF	0.030
Strensall	Stockton on Forest	Hermitage Farm House Malton Road Stockton on Forest	465208	457733	Rural	17/01016/FUL	31/08/2017	Not yet started	31/08/2020	0	1	1	0	1 No detached house	1 x 4 bed	New	Yes (demolish -1)	BF	0.150
Guilhi		12 Castlegate	460398	451619	City Centre	17/01562/FUL	04/09/2017	Under Construction	N/A	0	3	3	-6	3 No town houses	2 x 3, 1 x 5 bed	Conv	Yes - 9	BF	0.024
Fulford & H	Fulford	Former Saxon House 71-73 Fulford Road	460813	450842	Urban	15/02888/FUL	14/09/2017	Under Construction	N/A	0	10	10	10	10 No flats	5 x 1, 4 x 2, 1 x 3 bed	COU	No	BF	0.053
Bishopthorpe	Bishopthorpe	Cavendish Jewellers Ltd Garth Cottage Sim Balk Lane	459095	447979	Rural	17/01182/FUL	11/08/2017	Not yet started	11/08/2020	0	1	1	1	1 No detached house	1 x 3 bed	COU	No	BF	0.070
Guilhi		First Floor Flat 24 Gillygate	460160	452324	City Centre	17/01451/FUL	20/09/2017	Not yet started	20/09/2020	0	3	3	2	3 No flats	1 x 1, 2 x 2 bed	Conv	Yes -1	BF	0.027
Clifton		2 Ratcliffe Street	459977	453314	Urban	17/01787/FUL	26/09/2017	Not yet started	26/09/2020	0	1	1	1	1 No detached bungalow	1 x 1 bed	New	No	BF	0.006
Westfild		Wards Newsagents 45 York Road Acomb	457664	451436	Urban	17/01608/FUL	29/09/2017	Under Construction	N/A	1	3	2	2	2 No flats	2 x 1 bed	Conv	Yes -1	BF	0.012
Guilhi		Monkgate Guest House 65 Monkgate	460786	452476	City Centre	17/01596/FUL	03/10/2017	Not yet started	03/10/2020	0	1	1	1	1 no town house	1 x 6 bed	COU	No	BF	0.010
Fisher		Alma House 15 Alma Terrace	460764	450524	Urban	17/01763/FUL	31/10/2017	Not yet started	31/10/2020	0	7	7	6	7 No flats	1 x 1, 6 x 2 bed	COU/Conv	Yes -1	BF	0.041

Guilhi		The Fleeting Arms 54 Gillygate	460219	452399	City Centre	17/00580/FULM	06/10/2017	Under Construction	N/A	0	18	18	17	18 No flats (studio units)	18 x 1 bed	COU/Conv	Yes -1	BF	0.072
Westfld		83 Green Lane Acomb	457646	451081	Urban	17/00884/FUL	06/10/2017	Not yet started	06/10/2020	0	4	4	3	1 No detached house, 2 No semi-detached houses, 1 No detached bungalow	1 x 2 bed detached bungalow, 1 x 2 bed detached bungalow	New	Yes (demolish -1)	GDN	0.098
Westfld		24 Kir Crescent	457372	451034	Sub-Urban	17/01440/FUL	10/10/2017	Not yet started	10/10/2020	0	1	1	1	1 No town house	1 x 2 bed	New	No	GDN	0.017
Holgate		9 Holly Bank Grove	458703	450739	Urban	17/01912/FUL	06/11/2017	Not yet started	06/11/2020	0	1	1	1	1 No town house	1 x 3 bed	New	No	GDN	0.020
Hunt & Ne	Huntington	Arabesque House Monks Cross Drive Huntington	462443	455162	Sub-Urban	17/01369/ORC	31/07/2017	Not yet started	31/07/2022	0	56	56	56	56 No flats	54 x 1, 2 x 2 bed	COU	No	BF	0.183
Guilhi		Smiths Gore 48 Bootham	459955	452355	City Centre	17/01541/ORC	17/08/2017	Not yet started	17/08/2022	0	11	11	11	11 No flats	11 x 2 bed	COU	No	BF	0.118
Raw & Cliff	Clifton Wilt	Environment Agency Coverdale House Aviator Court	458892	454985	Sub-Urban	18/00172/ORC	02/10/2017	Not yet started	02/10/2020	0	34	34	34	34 No flats	34 x 1 bed	COU	No	BF	0.484
Raw & Cliff	Clifton Wilt	Home Housing Association Ltd 131 Brailford Crescent	459435	453903	Urban	17/02119/FUL	08/11/2017	Not yet started	08/11/2020	0	2	2	2	2 No flats	2 x 1 bed	COU	No	BF	0.026
Mick		The Falcon Tap 94 Micklegate	459842	451594	City Centre	17/01468/FULM	13/11/2017	Not yet started	13/11/2020	0	11	11	10	11 No flats	10 x 1, 1 x 3 bed	Conv/New	Yes -1	BF	0.041
Guilhi		Rear of 25 Bootham	460080	452317	City Centre	17/01445/FUL	15/11/2017	Not yet started	15/11/2020	0	8	8	8	8 No flats	5 x 1, 3 x 2 bed	New	No	BF	0.043
Rural W	Skelton	Woodstock Lodge Corban Lane Wigginton	456123	459074	Rural	17/01702/FUL	17/11/2017	Not yet started	17/11/2020	0	1	1	0	1 No detached house	1 x 6 bed	Conv	Yes -1	BF	0.500
Mick		4 Bridge Street	460163	451623	City Centre	17/01816/FUL	24/11/2017	Not yet started	24/11/2020	0	1	1	1	1 No Flat	1 x 2 bed	COU	No	BF	0.008
Mick		Holmea Guest House 6 Southlands Road	460032	450734	Urban	17/01257/FUL	28/11/2017	Not yet started	28/11/2020	0	1	1	1	1 No town house	1 x 5 bed	COU	No	BF	0.009
Guilhi		Bank of Scotland 6 Nessgate	460328	451657	City Centre	17/02451/ORC	11/12/2017	Not yet started	11/12/2022	0	16	16	16	16 No flats	16 x 1 bed	COU	No	BF	0.041
Guilhi		23 Piccadilly	460662	451543	City Centre	17/02624/ORC	28/12/2017	Not yet started	28/12/2022	0	24	24	24	24 No flats	9 x 1, 15 x 2 bed	COU	No	BF	0.107
Guilhi		Yh Training Services Ltd York House 15 Clifford Street	460370	451583	City Centre	17/02925/ORC	05/02/2018	Not yet started	05/02/2023	0	4	4	4	4 no flats	4 x 2 bed	COU	No	BF	0.026
Raw & Cliff	Clifton Wilt	Land to West of Block D Aviator Court	458918	455075	Sub-Urban	17/03067/FUL	05/03/2018	Not yet started	05/08/2021	0	6	6	6	6 No flats	4 x 1, 2 x 2 bed	New	No	BF	0.133
Osbaldwick	Osbaldwick	Land to South of 78 Osbaldwick Lane	462993	451696	Sub-Urban	17/01800/FUL	17/11/2017	Not yet started	17/11/2020	0	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	GDN	0.040
Heworth Without		7 Woodlands Grove	462134	453241	Urban	17/01890/FUL	17/11/2017	Not yet started	17/11/2020	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.020
Hunt & Ne	Huntington	1 Meadow Way Huntington	461869	455736	Sub-Urban	17/02397/FUL	30/11/2017	Not yet started	30/11/2020	0	1	1	1	1 No detached bungalow	1 x 2 bed	New	No	GDN	0.019
Westfld		21 Stirrup Close	456774	449898	Sub-Urban	17/01453/FUL	01/12/2017	Not yet started	01/12/2020	0	1	1	1	1 No town house	1 x 3 bed	New	No	GDN	0.012
Rural W	Upper Pop	49 Station Road Upper Poppleton	455940	453665	Large Village	17/02143/FUL	30/11/2017	Under Construction	N/A	0	1	1	0	1 No detached bungalow	1 x 3 bed	New	Yes -1	GDN	0.095
Guilhi		Proposed Hotel 46-50 Piccadilly (Residential Part of Sch	460615	451538	City Centre	17/00429/FULM	18/12/2017	Not yet started	18/12/2020	0	8	8	8	8 No flats	8 x 2 bed	New	No	BF	0.067
Fulford & H	Heslington	Little Hall Main Street Heslington	462764	450243	Sub-Urban	17/01867/FUL	20/12/2017	Not yet started	20/12/2020	0	1	1	1	1 No town house	1 x 3 bed	Conv	No	BF	0.184
Mick		Swinton Insurance 1 Bishopthorpe Road	460171	451066	Urban	17/02575/FUL	20/12/2017	Not yet started	20/12/2020	0	1	1	1	1 No flat	1 x 2 bed	COU	No	BF	0.073
Westfld		71 Green Lane Acomb	457650	451025	Urban	17/02293/FUL	08/12/2017	Under Construction	N/A	0	1	1	1	1 No flat	1 x 2 bed	COU	No	BF	0.096
Clifton		Doctors Surgery 32 Clifton	459619	452725	Urban	17/02290/FUL	10/01/2018	Not yet started	10/01/2021	0	2	2	2	2 No town houses	2 x 1 bed	COU	No	BF	0.012
Guilhi		Fiesta Latina 14 Clifford Street	460335	451555	City Centre	17/02224/FUL	12/01/2018	Not yet started	12/01/2021	0	10	10	10	10 No flats	4 x 1, 6 x 2 bed	COU	No	BF	0.037
Clifton		Archbishop Holgate Boathouse Sycamore Terrace	459504	452136	Urban	17/02717/FUL	12/01/2018	Not yet started	12/01/2021	0	1	1	1	1 No detached house	1 x 4 bed	New	No	BF	0.060
Mick		20 Priory Street	459897	451451	City Centre	17/01238/FUL	15/01/2018	Not yet started	15/01/2021	0	2	2	1	2 No flats	2 x 1 bed	New	Yes (demolish -1)	BF	0.010
Heworth		Heworth Court Hotel 76 Heworth Green	461405	452725	Urban	17/02492/FUL	01/02/2018	Not yet started	01/02/2021	0	2	2	2	2 No town houses	2 x 4 bed	COU	No	BF	0.122
Clifton		338 Burton Stone Lane	460122	453949	Urban	17/02798/FUL	02/02/2018	Not yet started	02/02/2021	0	1	1	1	1 No detached bungalow	1 x 2 bed	New	No	GDN	0.021
Osbaldwick	Dunnington	The Ridings 95 York Street Dunnington	466499	452324	Village	16/02663/FUL	8/2/18 Won on Appeal	Not yet started	08/02/2021	0	1	1	1	1 no detached bungalow	1 x 2 bed	New	No	GDN	0.037
Strensall	Stockton on	Whitcroft Sandy Lane Stockton on Forest	466056	456506	Small Village	17/02292/FUL	12/02/2018	Not yet started	12/02/2021	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.055
Dring & Wthp		26 Tadcaster Road Dringhouses	458759	449783	Urban	15/02726/FULM	09/03/2018	Not yet started	09/03/2021	0	11	11	11	3 No detached houses, 2 No detached bungalows, 6 No town houses	2 x 4, 1 x 5 bed detached houses, 2 x 3 bed detached bungalows, 6 x 3 bed town houses	New	No	GDN	0.520
Copmanthorpe	Copmanthorpe	Land to R/O 15 Tadcaster Road Copmanthorpe	456867	447475	Village	17/03069/FUL	15/03/2018	Not yet started	15/03/2021	0	1	1	1	1 No detached house	1 x 5 bed	New	No	GDN	0.120
Guilhi		Abbeyfield Veterinary Centre 49 Clarence Street	460271	452713	Urban	17/02739/FUL	06/02/2018	Not yet started	06/02/2021	0	2	2	2	2 no flats (student cluster units)	2 x 10 bed (cluster units)	COU	No	BF	0.040
Rural W	Askham RA	Askham Fields Farm York Road Askham Richard	453306	447595	Rural	17/02997/FUL	08/02/2018	Not yet started	08/02/2021	0	2	2	0	1 No detached house & 1 No flat	1 x 4 bed detached house, 1 x bed flat	New	Yes (demolish -2)	BF	0.280
Guilhi		93 Union Terrace	460289	452802	City Centre	17/00722/FUL	12/02/2018	Not yet started	12/02/2021	0	2	2	1	2 No flats	2 No flats	Conv	Yes (-1)	BF	0.017
Guilhi		Grove House 40-48 Penleys Grove Street	460593	452567	Urban	17/01129/FULM	13/02/2018	Not yet started	13/02/2021	0	32	32	32	32 No Flats	28 x 1, 1 x 2, 3 x 3 bed	COU	No	BF	0.250
Holgate		107 Carr Lane	457619	451885	Sub-Urban	17/02973/FUL	14/02/2018	Not yet started	14/02/2021	0	5	5	4	5 No flats	4 x 1, 1 x 2 bed	Conv	Yes (-1)	BF	0.028

Osbaldwick	Holtby	Sycamore Cottage Main Street Holtby	467385	454304	Small Village	17/02966/FUL	15/02/2018	Not yet started	15/02/2021	0	1	1	1	1	1 no detached bungalow	1 x 2 bed	Conv	No	BF	0.170
Guilth		The Jorvik Hotel 52 Marygate	459821	452189	City Centre	17/02250/FUL	23/02/2018	Not yet started	23/02/2021	0	2	2	2	2	2 No town houses	2 x 5+ bed	New	No	BF	0.077
Fisher		1B Wolsley Street	461167	451125	City Centre Ext 2	17/03024/FUL	27/02/2018	Not yet started	27/02/2021	0	1	1	1	1	1 No flat	1 x 2 bed	COU	No	BF	0.008
Westfld		HSBC 19 York Road Acomb	457768	451456	Urban	17/02912/RFP	15/03/2018	Not yet started	15/03/2023	0	1	1	0	0	1 No town house	1 x 4 bed	COU/Conv	Yes (-1)	BF	0.034
Heworth		81 Fifth Avenue	461423	452107	Urban	18/00058/FUL	12/03/2018	Not yet started	12/03/2021	0	2	2	1	2	2 No town houses	2 x 2 bed	Conv	Yes (-1)	BF	0.029
Guilth		147 Lawrence Street	461673	451359	City Centre Ext 2	17/03063/FUL	26/03/2018	Not yet started	26/03/2021	0	4	4	3	4	4 No flats	1 x 1, 3 x 2 bed	Conv	Yes (-1)	BF	0.017
Fulford & H Fulford		Adams House Hotel 5 main Street Fulford	460922	449602	Urban	16/02737/FUL	08/03/2017	Not yet started	08/03/2020	0	1	1	1	1	1 No detached house	1 x 5+ bed	COU	No	BF	0.065

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Skelt/Raw & ClifW	Clifton Without	The Grain Stores Water Lane	459367	454429	Urban/sub-urban	15/00121/REM	12/05/2015	Under Construction	N/A	122	215	93	93	44	44 No detached houses, 10 No semi-detached houses, 39 No Town Houses	4 bed semi-detached houses, 5 x 2, 27 x 3, 4 x 4, 3 x 5 bed town houses	New	No	BF	6.000
Mick		Former Terrys Factory Bishopthorpe Road Phase II	459961	449909	Urban	14/01716/FUL	24/02/2015	Under Construction	N/A	41	230	189	189	150	150 No flats, 7 No detached houses, 32 No town houses	2 x 3, 5 x 4 bed detached houses, 5 x 2, 27 x 3, 16 x 1, 134 x 2 bed flats	New	No	BF	
Mick		Former Terrys Factory Bishopthorpe Road Phase III	459961	449909	Urban	15/00456/FUL	22/07/2015	Under Construction	N/A	161	163	2	2	2	2 No flats	2 x 2 bed	COU	No	BF	
Fulfrd		Germany Beck Site East of Fordlands Road	461663	449121	Sub-Urban	12/00384/REMN	09/05/2013	Under Construction	N/A	0	655	655	655	houses, 25 No detached bungalows, 197 Town houses, 76 No flats	houses, 25 No detached bungalows, 197 Town houses, 25 x 2 bed detached bungalows, 150	New	No	GF	16.600	
Osbaldwick	Osbaldwick	(Phase 3 & 4) Land to West of Metcalfe Lane Osbaldwic	462913	452260	Sub-Urban	12/01878/REMN	13/03/2013	Under Construction	N/A	189	299	110	110	houses, 2 No detached bungalows, 2 No semi-detached bungalows, 65 No town houses, 24 No flats	x 4 bed semi-detached houses, 6 x 2 bed semi detached bungalows, 40 x 3 & 9 x 4 bed	New	No	GF		
Osbaldwick	Osbaldwick	(Phase 4 - amended) Land to West of Metcalfe Lane Os	462913	452260	Sub-Urban	16/00342/FULM	18/11/2016	Under Construction	N/A	0	36	36	36	4 No detached houses, 10 No semi-detached houses, 22 No town houses	bed semi-detached houses, 18 x 3, 4 x 4 bed town houses	New	No	GF		
Guilth		Hungate Development Site (Blocks D, F, & H)	460784	451839	City Centre	15/01709/OUTM	18/07/2006	Not yet started	N/A	0	466	466	466	662 No flats (Block D = 186 Flats, Block F = 101 flats, Block H = 179 flats)	both reserved matters (Block D: 97 x 1, 81 x 2, 8 x 3 bed and Block F: 52 x 1, 35 x 2 and 14 x	New	No	BF	4.100	
Guilth		Hungate Development Site (Block G)	460784	451839	City Centre	17/03032/REMN	19/02/2018	Not yet started	20/12/2020	0	196	196	196	196 Flats	129 x 1, 67 x 2 bed	New	No	BF		
Fishergate		St Josephs Convent of Poor Clare Collentines Lawrence	461372	451321	City Centre Ext 2	14/02404/FULM	09/03/2015	Under Construction	N/A	526	542	16	15	16	16 No flats	15 x 1, 1 x 3, bed clusters	New/COU	Yes -1	BF	2.560
Fulford & H Fulford		Royal Masonic Benevolent Institute Connaught Court St	460688	449521	Sub-Urban	13/03481/FULM	13/06/2016	Not yet started	13/06/2019	0	14	14	14	14 No detached houses	2 x 4, 8 x 5, 4 x 6 bed	New	No	GF	1.100	
Fishergate		York Barbican Paragon Street	460848	451211	City Centre Ext 2	13/02135/FULM	24/08/2017	Not yet started	24/08/2020	0	187	187	187	187 No flats	57 x 1, 130 x 2 bed	New	No	BF	0.960	
Guilth		The Cocoa Works Haxby Road	460535	453542	Urban	17/00284/FULM	14/09/2017	Not yet started	14/09/2020	0	258	258	258	258 Flats	37 x 1, 205 x 2, 16 x 3 bed	COU	No	BF	2.350	

3409 3345

	Housing Allocation Site
	Greenfield Site
	Garden Infill Site
	ORC - Office Residential Conversion
	Student Accommodation
	Retirement Living Accommodation

Appendix 2

Housing Allocations Trajectory

Ref	Site	Site Area	Yield	Timing	Density	Years 1 to 5	Years 6-10	Years 11-15	Years 16-21
H1	Former Gas Works, 24 Heworth Green (Phase 1)	2.87	271	Short Term (Years 1 -5)	94.43	271			
H1	Former Gas works, 24 Heworth Green (Phase 2)	0.67	65	Medium Term (Years 6-10)	97.01	65			
H3	Burnholme School	1.90	72	Short Term (Years 1 -5)	37.89	72			
H5	Lowfield School	3.64	162	Short to Medium term (Years 1 -10)	44.51	80	82		
H6	Land R/O The Square Tadcaster Road	1.53	0	Short to Medium Term (Years 1 -10)	0.00				
H7	Bootham Crescent	1.72	86	Short to Medium Term (Years 1 -10)	50.00	46	40		
H8	Askham Bar Park & Ride	1.57	60	Short Term (Years 1 -5)	38.22	60			
H10	The Barbican	0.96	187	Short Term (Years 1 -5)	194.79	187			
H20	Former Oakhaven EPH	0.33	56	Short Term (Years 1 -5)	169.70	56			
H22	Former Heworth Lighthouse	0.29	15	Short Term (Years 1 -5)	51.72	15			
H23	Former Grove House EPH	0.25	11	Short Term (Years 1 -5)	44.00	11			
H29	Land at Moor Lane Copmanthorpe	2.65	88	Short to Medium Term (Years 1 -10)	33.21	88			
H31	Eastfield Lane Dunnington	2.51	76	Short to Medium Term (Years 1 -10)	30.28	76			
H38	Land RO Rufforth Primary School Rufforth	0.99	33	Short to Medium Term (Years 1 -10)	33.33	33			
H39	North of Church Lane Elvington	0.92	32	Short to Medium Term (Years 1 -10)	34.78	32			
H46	Land to North of Willow Bank and East of Haxby Road, New Earswick	2.74	104	Short to Medium Term (Years 1 -10)	37.96	104			
H52	Willow House EPH, Long Close Lane	0.20	15	Short Term (Years 1 -5)	75.00	15			
H53	Land at Knapton Village	0.33	4	Short Term	12.12	4			
H55	Land at Layerthorpe	0.20	20	Short Term (Years 1 -5)	100.00	20			
H56	Land at Hull Road	4.00	70	Short Term (Years 1 -5)	17.50	70			
H58	Clifton Without Primary School	0.70	25	Short Term (Years 1 -5)	35.71	25			
H59	Queen Elizabeth Barracks – Howard Road, Strensall			Short to Medium term (Years 1 -10)					
ST1	British Sugar/Manor School	46.30	1200	Lifetime of the Plan (Years 1-16)	25.92	0	600	600	
ST2	Former Civil Service Sports Ground Millfield Lane	10.40	266	Short to Medium Term (Years 1 -10)	25.58	166	100		
ST4	Land adj. Hull Road & Grimston Bar	7.54	211	Short to Medium Term (Years 1 -10)	27.98	111	100		
ST5	York Central	35.00	1700	Lifetime of the Plan and Post Plan period (Years 1-21)	48.57	0	500	600	600
ST7	Land East of Metcalfe Lane	34.50	845	Lifetime of the Plan (Years 1 -16)	24.49	200	295	350	
ST8	Land North of Monks Cross	39.50	968	Lifetime of the Plan (Years 1 -16)	24.51	250	300	418	
ST9	Land North of Haxby	35.00	735	Lifetime of the Plan (Years 1 -16)	21.00	150	285	300	
ST14	Land to West of Wigginton Road	55.00	1348	Lifetime of the Plan and Post Plan period (Years 1 -21)	24.51	200	400	400	348
ST15	Land to West of Elvington Lane	159.00	3339	Lifetime of the Plan and Post Plan period (Years 1 -21)	21.00	300	900	900	900
ST16	Terrys Extension Site – Terry's Clock Tower (Phase 1)	2.18	22	Short to Medium Term (Years 1-5)		22			
ST16	Terry's Extension Site – Terry's Car Park (Phase 2)		33	Short to Medium Term (Years 1 – 10)			33		
ST16	Terry's Extension Site – Land to rear of Terry's Factory (Phase 3)		56	Short to Medium Term (Years 1 – 10)			56		
ST17	Nestle South (Phase 1)	2.35	263	Short to Medium Term (Years 1 -10)	111.91	100	163		
ST17	Nestle South (Phase 2)	4.70	600	Medium to Long Term (Years 6 – 15)	127.66		300	300	
ST31	Land to the South of Tadcaster Road, Copmanthorpe	8.10	158	Short to Medium Term (Years 1-10)	19.51	50	108		
ST32	Hungate (Phases 5+)	2.17	328	Short to Medium Term (Years 1-10)	151.15	128	200		
ST33	Station Yard, Wheldrake	6.00	147	Short to Medium Term (Years 1-10)	24.50	47	100		
ST35**	Queen Elizabeth Barracks, Strensall	28.80		Medium to Long Term (Years 6-15)	0.00				
ST36**	Imphal Barracks, Fulford Road	18.00	769	Post Plan period (Years 16-21)	42.72				600
		525.51	14440			3054	4562	3868	2448

From: Eamonn Keogh [REDACTED]
Sent: 22 July 2019 20:49
To: localplan@york.gov.uk
Subject: Proposed Modifications - Representations on behalf of Malton Road Developments
Attachments: 190722 Local Plan Mods Reps Malt Rd Bus Pk SUBMIT.pdf;
Local_Plan_Proposed_Mods_Response_Form_2019 Malt rd.pdf

Follow Up Flag: Follow up
Flag Status: Completed

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sirs,

Please find attached a representation on the Draft Local Plan Proposed Modifications on behalf of Malton Road Developments.

If you have any queries please get back to me.

Kind regards

Eamonn



O'Neill
ASSOCIATES
Chartered Town Planning Consultants

Eamonn Keogh
[REDACTED]
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James Nicolson Link
Clifton Moor
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City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Eamonn
Last Name		Keogh
Organisation (where relevant)	Malton Road Developments Ltd	O'Neill Associates
Representing (if applicable)		
Address – line 1	C/O Agent	Lancaster House
Address – line 2		James Nicolson Link
Address – line 3		Clifton Moor
Address – line 4		York
Address – line 5		
Postcode		YO30 4GR
E-mail Address		████████████████████
Telephone Number		01904 692313

Representations must be received by Monday 22 July 2019, up until midnight.

Representations received after this time will not be considered duly made.

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B -Your Representation

(Please use a separate Part B form for each issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

Document:

Topic Paper 1

Page Number:

Whole Document

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

We are not aware of any updated information that answers the points below that were made in our 2018 representations:

With regard to the duty to co-operate it may be the case the Council has consulted with neighboring authorities, but some of those authorities have expressed concerns that have not been fully resolved. Annex B to Agenda item 11 on the report of the Local Plan to the Council's Executive on the 25th January reported:

Hambleton Council: "...It [the Draft Plan] does not safeguard land for development and recognises the build out time of the Strategic sites will extend beyond the plan period. The proposed detailed boundaries of the Green Belt offer little opportunity to accommodate the increased level of growth proposed. If the City of York does not ensure that its longer-term development needs are met this will place pressure on area in neighbouring authorities"

Leeds city region LEP: "York has not applied the 10% market signals adjustment as recommended in the York 2017 Strategic Housing Market Assessment".

Ryedale Council: Discussions ongoing

Harrogate Council: Discussion ongoing

Selby District Council: *“Having read the SHMA Addendum, it is noted that this figure does not take into account the level of employment growth proposed by the Local Plan.....Whilst you are confident that you can realise the growth aspirations detailed within the Pre-Publication Local Plan within the City of York Boundary, Selby District Council is concerned that any increases to this figure could raise significant cross-boundary issues”.*

Selby Council requested additional information on Strategic site ST15 and the university site ST27 before providing any further comments on the potential impact these allocations may have on Selby.

What these comments demonstrate is that whilst the Council may have engaged in a process of dialogue with neighbouring authorities, it has not produced outcomes that have addressed some significant concerns of neighbouring authorities. Indeed, at this stage the views of some adjoining Authorities are not known and it is difficult to see how, in these circumstances, the Duty to Co-Operate has been complied with.

What does ‘Sound’ mean?

Soundness may be considered in this context within its ordinary meaning of ‘fit for purpose’ and ‘showing good judgement’. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework’s four ‘tests of soundness’ listed below.

What makes a Local Plan “sound”?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

See attached representation document Ref: 1907.ypy.lpreps.ek

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

Proposed changes are included in the representation document included with this representation

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are significant matters relating to the definition of the Green Belt that we wish to explore in more detail with the Inspector. We believe we can make a positive and constructive contribution to the discussion

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 2018 to inform the Local Plan process. We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't. City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

Signature

Date

CITY OF YORK COUNCIL LOCAL PLAN

PROPOSED MODIFICATIONS JUNE 2019

MALTON ROAD BUSINESS PARK AND LAND TO
NORTH EAST OF THE BUSINESS PARK

REPRESENTATIONS IN
SUPPORT OF AN ALLOCATION
FOR EMPLOYMENT LAND

July 2019



Chartered Town Planning Consultants

CONTENTS

- 1.0 INTRODUCTION
- 2.0 GREEN BELT - RESPONSE TO THE COUNCILS EVIDENCE
BASE
- 3.0 SUMMARY AND PROPOSED CHANGES TO THE LOCAL PLAN

(1907.ypy.lpreps.ek)
22 July 2019

1.0 INTRODUCTION

- 1.1 This statement is provided as a representation in response to the Proposed Modifications to the Draft Local Plan June 2019 (**the Draft Plan**) on behalf of Malton Road Developments Ltd, relating to Malton Road Business Park and land to the north east of the Business Park. The representation seeks the allocation of the site for employment use.
- 1.2 The detailed justification for the allocation of the site for employment purposes is set out in our representations made on the Publication Draft Plan in April 2018 and is not repeated here.
- 1.3 In drafting our representations on the proposed modifications, we are mindful that the Draft Plan is being examined under the transitional arrangements and the relevant National Planning Policy is the NPPF March 2012.

2.0 GREEN BELT - RESPONSE TO THE COUNCILS EVIDENCE BASE

2.1 Before proceeding to address the updated Green Belt evidence base, we set out what we consider to be the main policy guidance for assessing the evidence base.

2.2 Under the heading Protecting Green Belt the NPPF 2012 reaffirms the longstanding aim of Green Belt policy which is to:

Prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

2.3 The NPPF states the purposes of including land in the Green Belt which are:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.4 Paragraphs 83 to 85 are particularly relevant to the York Daft Local Plan. Paragraph 83 states:

Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

2.5 Paragraph 84 emphasises that:

When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.

- 2.6 Paragraph 85 expands on the issue of green belt permanence referenced in paragraph 83. It adds:

When defining boundaries, local planning authorities should (inter alia):

- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;....*
- *where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;....*
- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period;...*

- 2.7 The advice in paragraphs 83 to 85 of the 2012 NPPF is repeated in paragraphs 138 to 139 of the 2019 NPPF.

Regional Policy

- 2.8 The saved policies YH9 and Y1 of the RSS relating to Green Belt remain extant and therefore carry weight. They state:

Policy YH9, Green Belts

"C The detailed inner boundaries of the green belt around York should be defined in order to establish long term development limits that safeguard the special character and setting of the historic city."

Policy Y1, York Sub-Area Policy

Plans, strategies, investment decisions and programmes for the York sub area should:

C Environment

- 1. In the city of York LDF, define the detailed boundaries of the outstanding sections of the outer boundary of the York Green Belt about 6 miles from York City Centre and the inner boundary in line with Policy YH9C"*

2. *Protect and enhance the nationally significant historical and environmental character of York, including its historic setting, views of the Minster and important open areas.*

Response to the Council's Evidence Base

2.9 In their letter of 25th July 2018 to the Council the Inspectors commented:

As we understand it, there has at no time been an adopted development plan for York with an adopted policies map identifying the Green Belt, or at least not its boundaries. The Local Plan now sets out to rectify this. It proposes to designate land as Green Belt and to delineate Green Belt boundaries.

2.10 The Inspector's letter posed the following questions to the Council:

- i. *For the purpose of paragraph 82 of the NPPF, is the Local Plan proposing to establish any new Green Belt?*
- ii. *If so, what are the exceptional circumstances for so doing, and where is the evidence required by the five bullet points set out at paragraph 82 of the NPPF?*
- iii. *If not, does the Local Plan propose to remove any land from an established Green Belt? If it does, is it necessary to demonstrate that exceptional circumstances exist to warrant that approach? Or is it the case that the Local Plan establishes the Green Belt boundaries for the first time, such that the exclusion of land from the Green Belt – such as at the 'garden villages', for example – is a matter of establishing Green Belt boundaries rather than altering them, in the terms of paragraph 83 of the NPPF?*

Notwithstanding all of the above, it is not clear to us how the Council has approached the task of delineating the Green Belt boundaries shown on the Policies Map submitted. Unless we have missed something, no substantive evidence has been provided setting out the methodology used and the decisions made through the process. We ask that the Council now provides this.

2.11 In response to these questions the Council has produced an extensive addendum to explain its approach to defining the York's Green Belt Boundaries. For the reasons already outlined in our original representations (April 2018) we believe the Council has addressed the Green Belt issues on an entirely erroneous assumption that is highlighted by the questions the Inspectors have posed and that the Council attempts to answer.

This erroneous approach becomes evident in the answers and statements in Section 2 of the Addendum where the Council set out the scope of the addendum.

2.12 Our response to the Inspectors questions, having regard to the addendum produced by the Council, is set out below following the order of the questions in paragraph 3.10 above.

- (i) We believe the Local Plan is not trying to establish new Green Belt. Nor should it be seeking to establish new Green Belt. The role of the Local Plan is clearly set out in saved regional planning policies and has been accepted and endorsed by Inspectors on appeal. The purpose of the Local plan is to define the inner and outer boundaries.
- (ii) Given our answer in (i), the Council does not have to demonstrate any exceptional circumstances for establishing new Green Belt
- (iii) We believe this question encapsulates the key issue for the Local Plan in respect of the Green Belt. Regional Policy has established the general extent of the Green Belt. We agree with the second part of the Inspectors question, that in establishing the Green Belt boundaries for the first time, it follows that the exclusion of land from the Green Belt – such as at the 'garden villages', for example – is fundamentally a matter of establishing Green Belt boundaries rather than altering them, in the terms of paragraph 83 of the NPPF.

It will help in understanding this process to be aware that there is a key omission in saved Regional Policy YH9C. The full wording of Policy YH9C in the 2008 Approved Regional Guidance for Yorkshire and the Humber was:

*The detailed inner boundaries of the Green Belt around York should be defined in order to establish long term development limits that safeguard the special character and setting of the historic city. **The boundaries must take account of the levels of growth set out in this RSS and must also endure beyond the Plan period.***

The highlighted sentence, for whatever reason, never made it into the save policy – possibly because it refers to “...levels of growth...” that were not saved. However, the intention is clear and the inescapable logic of the current process is that in defining the detailed Green Belt boundaries, the Council must exclude land required to meet the growth of the City.

Much of the commentary relating to the Green Belt both from the Council and other respondents on the Local Plan Consultations, speaks from a position that assumes the Green Belt boundaries are fixed in an adopted plan and that any suggestion that sites should be allocated for development will result in land being taken **out** of the Green Belt (in which case the second sentence of paragraph 83 of the NPPF would apply i.e. Green Belt boundaries should only be altered in exceptional circumstances).

This is, however, an erroneous assumption because the Green Belt boundaries around York are being defined (or established) for the first time. They are not being altered. In this case, paragraph 85 of the NPPF is therefore the Key advice to be considered. In defining / establishing boundaries the Council must meet the identified requirement for sustainable development i.e. it must allocate land to meet identified needs for housing, employment, leisure etc... and other needs. This is exactly what the missing sentence of Policy YH9C was referring to.

In other words, **it is not a question of what land should be taken out** of the Green Belt. The Council is at the point of deciding what land **should not be included** in the Green Belt in order to meet the identified requirements for sustainable development.

- 2.13 The Council has therefore misunderstood and wrongly applied NPPF policy. This misunderstanding is captured in paragraph 2,13 of the Addendum which states:

This addendum also explains why exceptional circumstances exist to justify alterations to the general extent of the Green Belt, in order to bring forward strategic sites to meet development needs.

- 2.14 The erroneous approach taken by the Council to defining the Green Belt boundaries has serious consequences in its attitude to meeting the needs for sustainable development over the plan period because it has resulted in an overly restrictive approach to identifying land for housing and other development needs on the mistaken assumption the those development needs had to constitute “exceptional circumstances”. This has, in turn, resulted in an erroneous approach to the issue of safeguarded land

Safeguarded Land

- 2.15 Paragraph 85 of the NPPF advises that when defining Green Belt boundaries for the first time, local planning authorities should identify areas of ‘safeguarded land’ between the urban area and the Green Belt, to meet longer-term development needs beyond the plan period and make clear that the safeguarded land is not allocated for development at the present time.
- 2.16 The failure of the Council to address this requirement is a fundamental failing of the Local Plan and goes to the heart of the Soundness of the Plan.
- 2.17 As already stated, the Green Belt boundaries around York are being defined (or established) for the first time. They are not being altered. The Council is at the point of deciding what land should not be included in the Green Belt in order to meet the identified requirements for sustainable development.
- 2.18 Critically, the Council must demonstrate to the Local Plan Inspector that the Green Belt boundaries will not have to be altered at the end of the plan period. As we have demonstrated in our previous representations (April 2018), the Draft Plan has not allocated adequate land to meet employment needs with the plan period and has failed to exclude land to meet longer-term development needs stretching **well beyond** the plan period as recommended by paragraph 85 of the NPPF.
- 2.19 It can do this by including in areas of safeguarded to meet development needs beyond the plan period. The 2013 Preferred Options Draft Local Plan sensibly included a reasonable amount of safeguarded land to ensure the proposed Green Belt Boundaries

would remain permanent beyond the Plan period. Unfortunately, this sensibility appears to have been abandoned.

2.20 Exactly what constitutes "...well beyond..." the plan period was considered by officers in a report to the Local Plan Working Group on 29th January 2015 (See Appendix 1). Officers has sought advice from John Hobson QC who was asked to advise on the approach which should be adopted in relation to the determination of the Green Belt boundary in the preparation of the York Local Plan In particular he was asked to consider how long beyond the Plan period should a Green Belt endure once it is defined in a statutory plan.

2.21 In response Counsel advised:

9 *.....As paragraph 85 makes clear this involves consideration of the development needs which are to be met during the Plan period, and also the longer term development needs, "stretching well beyond the Plan period". Quite how far beyond is a matter of planning judgment, but in my opinion a 10 year horizon beyond the life of the Plan as mentioned in my Instructions would be appropriate.*

2.22 Counsels advice concluded with:

16 *In my opinion if no safeguarded land is identified in the emerging Local Plan this would give rise to a serious risk of the Plan being found unsound. There would be a failure to identify how the longer term needs of the area could be met, and in particular a failure to indicate how those longer term needs could be met without encroaching into the Green Belt and eroding its boundaries.*

17. *The only argument which it seems to me the Council could deploy to avoid this danger is to be able to demonstrate that there is sufficient land outside the Green Belt boundary which will be suitable for meeting the need for further development, and which is likely to be available when those needs arise. The important point is to be able to demonstrate that the Green Belt boundary will not be affected. I assume many authorities have adopted Local Plans without including safeguarded land. It would have been appropriate for them to do so in accordance with their local circumstances. However, I am unaware of a situation comparable to the circumstances in York.*

2.23 This advice was reported to the January 2015 LPWG with a recommendation:

23. It is recommended that Members of the Local Plan Working Group recommend Cabinet to:

Agree option 1 in this report to include safeguarded land designations in the Plan to ensure that the Green Belt will endure for a for a minimum of ten years beyond the end of the Plan period.

Reason: So that an NPPF compliant Local Plan can be progressed.

2.24 Two previous Local Plan Inspectors in 2000 and 2012 both dismissed the draft Development Plan due to a lack of evidence confirming that Green Belt boundaries would endure beyond the Plan period. Questions about the permanence of the Green Belt boundary beyond the plan period have also been raised by Selby District Council.

2.25 The omission of this key component of the Local Plan spatial strategy is a serious weakness and may well result in the Plan being found unsound, particularly as the Plan period is only up to 2033 and from the point of anticipated adoption in 2020/21 will only be a 12-year plan with land identified for development needs for an further 5 years. This would give a Green Belt Boundary of 17 years as against a 25-year boundary that would be provided by a 15-year plan with safeguarded land for potential development needs 10 years beyond.

Assessment of the site against the purposes of Green Belt

2.26 In order to determine whether it is appropriate to allocate the site at Malton Road to meet the development needs of the City and exclude the site from the Green Belt, the site is assessed against the 5 purposes of the Green Belt:

I. To check the unrestricted sprawl of large built-up areas

The allocation of the site will assist in meeting identified requirement for sustainable employment development. The allocation of the site will enable the Council to define Green Belt boundaries that will endure beyond the plan period and therefore check the unrestricted sprawl of the larger urban area.

2. To prevent neighbouring towns merging into one another

The Council Green Belt appraisal indicates that the site does not perform an important role in preventing neighbouring town merging into one another.

3. To assist in safeguarding the countryside from encroachment

The allocation of the site will assist in meeting identified requirement for sustainable development. The allocation of the site will enable the Council to define Green Belt boundaries that will endure beyond the plan period and therefore safeguard the countryside from encroachment.

4. To preserve the setting and special character of historic towns

In the Council's Green Belt Appraisal, the site is not identified as being important to the setting or special character of the City. It is not Stray Land, an area preventing coalescence, a river corridor or as an area retaining the rural character of the city. It does fall within a proposed extension to a Green wedge. However, the designation of Green Wedge Extension is a consultation proposal and is not defined in a Statutory Local Plan. Furthermore, development land is often a common feature of Green wedges and with appropriate landscaping, the allocation of the site for employment purpose should not conflict with the Green Wedge Objective. Therefore there is no risk to the setting and special character of York as a historic city.

5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land

There are few areas of York in need of regeneration. Most, if not all, of the few remaining brownfield sites have planning applications pending or redevelopment proposals outstanding. In view of the scale of additional house allocation required to meet the objectively assessed housing needs of the City, significant additional employment land and housing allocation are required. In this context the development of the site will have no impact on the viability of remaining brownfield sites in the City.

3.0 SUMMARY AND CONCLUSIONS

- 3.1 Our conclusions are unchanged, from the conclusions in our 2018 representations. The Draft Local Plan is unsound because it fails to allocate enough land to meet the existing and future employment land requirements of the City.
- 3.2 The Draft Plan takes an overly cautious and unjustified approach to employment land allocation. As Green Belt Boundaries are being defined for the first time the Plan should exclude enough land from the Green Belt to cater for anticipated and unexpected development needs for at least 10 years beyond the Plan period, not 5 years as proposed.
- 3.3 Market evidence indicates there is strong and unfulfilled demand for employment floorspace in the District.
- 3.4 There is a need for employment land to meet the requirements of small indigenous businesses for reasonably cheap premises that are priced out of the urban area by demand for residential land.
- 3.5 There is a need to have land available to meet potential major inward investment requirements. The cautious approach of the Draft Plan fails to meet this objective.

Suggested changes to the Plan

- 3.6 To make the Plan Sound,
- (i) the 14.66 hectares at the Malton Road Business Park should be included as an employment allocation in Policy ECI of the Plan;
 - (ii) The site outlined red on the Plan at Appendix A in our 2018 representations should be identified on the Local Plan Proposals Map as an employment allocation;
 - (iii) Should the Inspector conclude the site is not required at the present time to meet the employment land requirement, the undeveloped 10.66 hectares to the

north of the business park should be designated as safeguarded land in the Local Plan

- 3.7 There are no overriding technical constraints that would prevent development of the site. The site is not constrained by any nature conservation, landscape or other planning designations. The site should be allocated for employment use in the Draft Local plan.

From: Susie Cawood [REDACTED]
Sent: 22 July 2019 07:25
To: localplan@york.gov.uk
Cc: [REDACTED]
Subject: Chamber of Commerce Local Plan Modifications Consultation Response
Attachments: Local_Plan_Proposed_Modifications_Consultation_Response_Form_2019.pdf; Chamber Local Plan Modifications Reps.pdf

Follow Up Flag: Follow up
Flag Status: Completed

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Please find attached the York & North Yorkshire Chamber of Commerce's representations regarding the York Local Plan modifications consultation.

Kind regards

Susie Cawood

Susie Cawood

Head of York & North Yorkshire Chamber
Tel: 01904 567838
Mobile: [REDACTED]

www.yorkchamber.co.uk/

York & North Yorkshire Chamber, Innovation Centre, York Science Park, Innovation Way, Heslington, York, YO10 5DG



City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make.

Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	
First Name	Steve	
Last Name	Secker	
Organisation (where relevant)	York and North Yorkshire Chamber of Commerce Property Forum	
Representing (if applicable)		
Address – line 1	██████████	
Address – line 2	██████████	
Address – line 3	██████████	
Address – line 4		
Address – line 5		
Postcode	██████████	
E-mail Address	████████████████████	████████████████████

Telephone Number	[REDACTED]	[REDACTED]
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Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B -Your Representation

(Please use a separate Part B form for each issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:	PM3, PM4, PM5, PM20a to 20d, PM21a to 21d
Document:	Proposed Modifications
Page Number:	9, 10, 23, 24

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

The Chamber is not aware of any updated information that answers the point below that were made in our 2018 representations:

With regard to the duty to co-operate it may be the case the Council has consulted with neighboring authorities, but some of those authorities have expressed concerns that have not been fully resolved. Annex B to Agenda item 11 on the report of the Local Plan to the Council's Executive on the 25th January reported:

Hambleton Council: "...It [the Draft Plan] does not safeguard land for development and recognises the build out time of the Strategic sites will extend beyond the plan period. The proposed detailed boundaries of the Green Belt offer little opportunity to accommodate the increased level of growth proposed. If the City of York does not ensure that its longer-term development needs are met this will place pressure on area in neighbouring authorities"

Leeds city region LEP: "York has not applied the 10% market signals adjustment as recommended in the York 2017 Strategic Housing Market Assessment".

Ryedale Council: Discussions ongoing

Harrogate Council: Discussion ongoing

Selby District Council: *“Having read the SHMA Addendum, it is noted that this figure does not take into account the level of employment growth proposed by the Local Plan.....Whilst you are confident that you can realise the growth aspirations detailed within the Pre-Publication Local Plan within the City of York Boundary, Selby District Council is concerned that any increases to this figure could raise significant cross-boundary issues”.*

Selby Council requested additional information on Strategic site ST15 and the university site ST27 before providing any further comments on the potential impact these allocations may have on Selby.

What these comments demonstrate is that whilst the Council may have engaged in a process of dialogue with neighbouring authorities, it has not produced outcomes that have addressed some significant concerns of neighbouring authorities. Indeed, at this stage the views of some adjoining Authorities are not known and it is difficult to see how, in these circumstances, the Duty to Co-Operate has been complied with.

What does ‘Sound’ mean?

Soundness may be considered in this context within its ordinary meaning of ‘fit for purpose’ and ‘showing good judgement’. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework’s four ‘tests of soundness’ listed below.

What makes a Local Plan “sound”?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

See attached representation document

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

Proposed changes are included in the representation document included with this representation

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 2018 to inform the Local Plan process. We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't. City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

Signature

Date

22 July 2019

City of York Local Plan proposed modifications consultation 2019

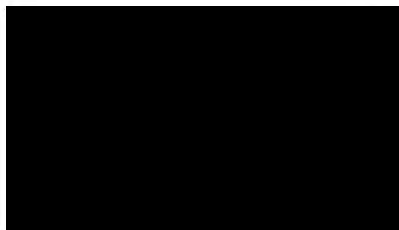
I am writing as chair of York Property Forum on behalf of the York and North Yorkshire Chamber of Commerce.

The Chamber is keen, as are many of our members, for York to have a Local Plan, it has been far too long since the last one. York is a great place which has many strengths and there is a massive opportunity to make more of these strengths.

The business community needs the framework that the local plan should provide to help invest more in the City. Without continued investment in new offices, hotels, retail, business premises, housing and transport infrastructure the city will suffer lower economic growth than would otherwise be the case and this great opportunity for York could be missed. Strong and ambitious growth will in turn help address the relatively high inequality in the city, particularly through the delivery of more employment and more housing, affordable as well as all other forms of tenure.

The Chamber believes that the current draft local plan lacks the ambition necessary to support this growth. We therefore object to the proposed modifications to the draft local plan as set out in the attached consultation response document and appendix.

We welcome all opportunities to work with the City of York Council and wider community to help build a stronger York.



Steve Secker
Chair, York & North Yorkshire Chamber Property Forum

1.0 INTRODUCTION

- 1.1 This submission is made on Behalf of the York and North Yorkshire Chamber of Commerce on the Proposed Modifications to the Draft York Local Plan.
- 1.2 The Chamber has made representations at all recent stages of the Local Plan preparation – most recently on the Publication Draft Plan in April 2018. These representations focus exclusively on the proposed modifications to the Plan. In all other respects the comments we made on the Draft Plan at the Publication Stage remain unchanged. In particular the Chamber would highlight its continued concern about the pressure on the supply of employment land.
- 1.3 In drafting our representations on the proposed modifications, we are mindful that the Draft Plan is being examined under the transitional arrangements and the relevant National Planning Guidance is the NPPF March 2012.
- 1.4 Table 1 below sets out a summary of our response and indicates, where appropriate, where additional commentary to our response can be found.

Table 1 Summary of our response on the Proposed Modifications

Proposed Modification	Response	Comment
PM3 Explanation of City of York Housing Needs	We object to the proposed modification	Our objection is elaborated in section 2 of this representation
PM4 Policy SS1: Delivering Sustainable Growth for York	We object to the proposed modification	Our objection is elaborated in section 2 of this representation
PM5 - Policy SS1: Delivering Sustainable Growth for York	We object to the proposed modification	Our objection is elaborated in section 2 of this representation

<p>PM20a to PM20d – Policy H1: Housing Allocations</p>	<p>We object to the proposed modification</p>	<p>The allocations are inadequate to meet the housing needs of the City. Our objection is elaborated in section 2 of this representation</p>
<p>PM21a to PM21d - Policy H1: Housing Allocations</p>	<p>We object to the proposed modification</p>	<p>The allocations are inadequate to meet the housing needs of the City. Our objection is elaborated in section 2 of this representation</p>
<p>PM22 - Policy H1: Housing Allocations Explanation</p>	<p>We object to the proposed modification</p>	<p>The allocations are inadequate to meet the housing needs of the City. Our objection is elaborated in section 3 of this representation</p>

2.0 OBJECTION TO PROPOSED MODIFICATIONS PM3, PM4, PM5, PM20a to 20d, PM21a to 21d AND PM 22

Plan Period

- 2.1 The Submission Draft Plan proposes a 16-year plan period starting at 1st April 2017 and extending to 31st March 2033. To that the plan has made provision for development needs for an additional 5 years to ensure a “permanent” Green Belt Boundary. We will deal with issue of permanence later in this representation.
- 2.2 On the issue of the plan period, there is an immediate and obvious issue. Two years have elapsed since the start of the plan period and in the absence of the adopted plan, there has been little if any development activity on any of the strategic and large housing sites. Optimistically, the plan will not be adopted until mid or late 2020. Realistically, probably not until early to mid-2021. At that point 4 years of the plan period will have elapsed with no housing development of any significance on the strategic sites, leaving only 12 years of the period remaining.
- 2.3 To meet the housing needs of the city the plan period should be moved forward so that the development needs of the city can be properly accommodated.

The Housing Requirement

- 2.4 In our previous representation the Chamber made clear its concern with the proposed level of housing provision which it considered inadequate to meet the housing and economic needs of the City. The proposed modification to reduce the housing requirement further to 790 dwellings per annum amplifies our concern,
- 2.5 On the issue of housing the NPPF is clear about the need for a significant increase in housebuilding to address existing backlog and meet future needs. Local authorities are encouraged to “**...boost significantly...**” the supply of housing. Paragraph 47 of the NPPF states:

To boost significantly the supply of housing, local planning authorities should:

- *use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area*
- *identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;.....*

2.6 We believe the Council, has adopted the wrong approach in estimating housing commitments, housing backlog and the inclusion of student housing in the backlog and housing commitments.

2.7 Following the submission of the Local Plan, the Inspectors wrote to the Council with queries about the Submission Draft housing allocation. The Inspector's letter of 25th commented that, without prejudice to the findings of the Examination, the 2017 SHMA update:

..... appears to be a reasonably robust piece of evidence which follows both the NPPF and the national Planning Practice Guidance. The plan, however, aims to provide sufficient land for 867 dpa

2.8 The Inspectors then went on to query why the Council had settled on a figure of 867 dwellings per annum.

This [note in the front of September 2017 SHMA Update] explains that the Council accepts the figure of 867 dpa, but does not accept the conclusions of the SHMA Update concerning the uplift or the consequent OAN figure of 953 dpa. The reasons given for the latter appear to relate to the challenge of the 'step-change' in housing delivery needed. We also note that it says the Council considers GL Hearn's conclusions to be "... speculative and arbitrary, rely too heavily on recent short-term unrepresentative trends and attach little or no weight to the special character and setting of York and other environmental constraints".

Precisely what it is about the SHMA Update that the Council considers "speculative and arbitrary" is not apparent to us. We are also unsure why you consider the SHMA Update to be "too heavily reliant on recent short-term unrepresentative trends". We therefore ask you to elaborate on these shortcomings in your evidence.

Difficulty in housing delivery and the existence of environmental constraints have no place in identifying the OAN. If such matters are to influence the plan's housing requirement, which you will appreciate is a different thing to the OAN, the case for this must be made and fully justified. At present, unless we have missed something, it is not. Overall, as things presently stand, we have significant concerns about the Council's stance regarding the OAN.

2.9 In response to these queries the Council commissioned another update of the OAN. This Housing Needs Update January 2019 arrived at an OAN of 790 dwellings per annum based on 2016 Sub National Population Projections and 2016 based Household Projections. This is a significant reduction in the OAN compared with previous estimates. Using this OAN the housing requirement for the Plan period would be:

Table 2 Housing Requirement using OAN of 790 dwellings Per annum.

Plan period 1st April 2017 to 31 st March 2033	
Total Need 2017 -2032/33 (based on 790 dwellings per annum)	12,640
plus 32 dwellings per annum to meet backlog	512
Total requirement	13,152
Unimplemented Permissions @ 1st April 2018 less 10% for non-implementation (3,345 x 0.9)	3,010
Windfalls (from Year 4) @ 169 pa	2,197
Requirement to be provided through allocations ((13,152) – (3,010 + 2,197))	7,945

2.10 We consider this (Council) assessment of the requirement remaining and the housing allocations set out in the Draft Plan to be inadequate for the following reasons:

- (i) The use of 2016 population and household projections is contrary to Government Guidance;
- (ii) The housing need calculation is too low;
- (iii) The calculation of completions since 2012 is too high (i.e. the Councils estimate of backlog is too low);
- (iv) Outstanding commitments include student housing that should be excluded;
- (v) The assumptions on windfalls are questionable and should not be treated as a component of the Plan;

2.11 The Councils proposed modification to the housing requirement from 867 to 790 adds further unnecessary confusion to the housing figure debate. The modification is contradictory to the advice given by the Council in its letter of 29th January to the Inspectors which stated that the updated SHMA work had been undertaken to:

“seek to confirm that the 867 dwellings per annum proposed in the submitted Plan can be shown to robustly meet requirements”.

2.12 Fundamentally, the way the OAN has been calculated is contrary to National Planning Policy. This is confirmed by Government in the updated Planning Practice Guidance (revised on the 20th February 2019) where Paragraph 005 Ref Id. 2a-005-20190220 states that:

“The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes”.

2.13 Accordingly, whether using the “old” or “new” methodology, it is clear that the Government have rejected the 2016 projections and consequently their use in the calculation of an LPA’s annual housing requirement. From a practical point of view, given the unequivocal stance of the updated Planning Practice Guidance, the Government are not going to go back and update the old guidance to make clear that the 2016 projections have been rejected. This is particularly the case of plans being prepared under the “transitional arrangements” whereby Local Plans submitted ahead of Jan 2019 will be assessed on the basis of the old methodology and importantly the evidence base it relied upon at that time.

2.14 The shortcomings of the use of the 2016 population and household projections are acknowledged in the updated SHMA. On the issues of affordability, the Updated SHMA is even more damning. It states:

*4.17 At the median level, York has the highest affordability ratio, and thus the least affordable housing, relative to surrounding North Yorkshire, Yorkshire and Humber, and England. In addition, the affordability ratio in York has also increased the most in the past five years relative to the other geographies – **indicating a significant worsening in affordability.....***

4.19 The affordability statistics and the market signals reveal that as a whole, York is becoming increasingly more unaffordable and that a market signals adjustment in the City is necessitated.

2.15 The Council’s reliance on the 2016 population and household projections is not only contrary to Government guidance, but also flies in the face of the evidence demonstrating the very high demand for housing in the face of diminishing supply in York. The evidence points overwhelmingly to strong and entrenched market signals issues across York evidenced by worsening affordability. Fundamentally the updated SHMA promotes a low housing requirement figure that contradicts the Government’s objective of significantly boosting the supply of housing particularly in areas of high housing need such as York.

2.16 The Chamber is particularly concerned at the scale of the backlog in housing completions in recent years. The data from the Council shows that since 2012 the backlog amounts to 2,902 dwellings. We have excluded student house units from the completion data as this is not meeting general housing requirements. We have updated our Table 1 from our 2018 representation below. It reaffirms our deep concerns at the continuing failure of the Council to address the City' housing needs.

Table 3 Housing completion backlog for the period 2012-2017

Year	Net Dwellings Added (Council Figures)	Less student units	Net C3 Dwelling units	2017 SHMA recommended housing requirement	Backlog/ Surplus
2012/13	482	0	482	953	-471
2013/14	345	0	345	953	-608
2014/15	507	0	507	953	-446
2015/16	1121	579	542	953	-411
2016/17	977	152	825	953	-128
2017/18	1296	637	659	953	-294
2018/19	449	40	409	953	-544
Total	3,432	731	2,701	6,671	-2,902

3.0 REPRESENTATIONS ON GREEN BELT EVIDENCE BASE

Response to the Councils Evidence Base

3.1 In their letter of 25th July 2018 to the Council, the Inspectors commented:

As we understand it, there has at no time been an adopted development plan for York with an adopted policies map identifying the Green Belt, or at least not its boundaries. The Local Plan now sets out to rectify this. It proposes to designate land as Green Belt and to delineate Green Belt boundaries.

3.2 The Inspectors letter posed the following questions to the Council:

- i. *For the purpose of paragraph 82 of the NPPF, is the Local Plan proposing to establish any new Green Belt?*

- ii. *If so, what are the exceptional circumstances for so doing, and where is the evidence required by the five bullet points set out at paragraph 82 of the NPPF?*
- iii. *If not, does the Local Plan propose to remove any land from an established Green Belt? If it does, is it necessary to demonstrate that exceptional circumstances exist to warrant that approach? Or is it the case that the Local Plan establishes the Green Belt boundaries for the first time, such that the exclusion of land from the Green Belt – such as at the 'garden villages', for example – is a matter of establishing Green Belt boundaries rather than altering them, in the terms of paragraph 83 of the NPPF?*

Notwithstanding all of the above, it is not clear to us how the Council has approached the task of delineating the Green Belt boundaries shown on the Policies Map submitted. Unless we have missed something, no substantive evidence has been provided setting out the methodology used and the decisions made through the process. We ask that the Council now provides this.

3.3 Our response to the Inspectors questions, having regard to the addendum produced by the Council, is set out below following the order of the questions in paragraph 3,10 above.

- (i) We believe the Local Plan is not trying to establish new Green Belt. Nor should it be seeking to establish new Green Belt. The role of the Local Plan is clearly set out in saved regional planning policies and has been accepted and endorsed by Inspectors on appeal. The purpose of the Local plan is to define the inner and outer boundaries.
- (ii) Given our answer in (i), the Council does not have to demonstrate any exceptional circumstances for establishing new Green Belt.
- (iii) We believe this question encapsulates the key issue for the Local plan in respect of the Green Belt. Regional Policy has established the general extent of the Green Belt. We agree with the second part of the Inspectors question, that in establishing the Green Belt boundaries for the first time, it follows that the exclusion of land from the Green Belt – such as at the 'garden

villages', for example – is fundamentally a matter of establishing Green Belt boundaries rather than altering them, in the terms of paragraph 83 of the NPPF.

In other words, **it is not a question of what land should be taken out** of the Green Belt. The Council is at the point of deciding what land **should not be included** in the Green Belt in order to meet the identified requirements for sustainable development.

- 3.4 The Council has therefore misunderstood and wrongly applied NPPF policy. This misunderstanding is captured in paragraph 2.13 of the Addendum which states:

This addendum also explains why exceptional circumstances exist to justify alterations to the general extent of the Green Belt, in order to bring forward strategic sites to meet development needs.

- 3.5 The erroneous approach taken by the Council to defining the Green Belt boundaries has serious consequences in its attitude to meeting the needs for sustainable development over the plan period because it has resulted in an overly restrictive approach to identifying land for housing and other development needs on the mistaken assumption the those development needs had to constitute “exceptional circumstances”. This has, in turn, resulted in an erroneous approach to the issue of safeguarded land.

Safeguarded Land

- 3.6 Paragraph 85 of the NPPF advises that when defining Green Belt boundaries for the first time, local planning authorities should identify areas of ‘safeguarded land’ between the urban area and the Green Belt, to meet longer-term development needs beyond the plan period and make clear that the safeguarded land is not allocated for development at the present time. The failure of the Council to address this requirement is a fundamental failing of the Local Plan and goes to the heart of the Soundness of the Plan.

3.7 The Council has to demonstrate that the Green Belt boundaries will not have to be altered at the end of the plan period. The Chamber believes the Draft Plan has not allocated adequate land to meet housing or employment needs with the plan period and has failed to exclude land to meet longer-term development needs stretching **well beyond** the plan period as recommended by paragraph 85 of the NPPF.

3.8 It can remedy this failing by including in areas of safeguarded to meet development needs beyond the plan period.

3.9 Exactly what constitutes “...well beyond...” the plan period was considered by officers in a report to the Local Plan Working Group on 29th January 2015. Having received Counsels advice, officers recommended:

23. It is recommended that Members of the Local Plan Working Group recommend Cabinet to:

Agree option 1 in this report to include safeguarded land designations in the Plan to ensure that the Green Belt will endure for a for a minimum of ten years beyond the end of the Plan period.

Reason: So that an NPPF compliant Local Plan can be progressed.

3.10 Two previous Local Plan Inspectors in 2000 and 2012 both dismissed the draft Development Plan due to a lack of evidence confirming that Green Belt boundaries would endure beyond the Plan period. Questions about the permanence of the Green Belt boundary beyond the plan period have also been raised by Selby District Council.

3.11 The omission of this key component of the Local Plan spatial strategy is a serious weakness and may well result in the Plan being found unsound, particularly as the Plan period is only up to 2033 and, from the point of anticipated adoption in 2020/21, will only be a 12-year plan with land identified for development need for an further 5 years. This would give a Green Belt Boundary of 17 years as against a 25-year boundary that would be provided by a 15-year plan with safeguarded land for potential development needs for 10 years beyond.

From: Graeme Holbeck [REDACTED]
Sent: 22 July 2019 16:37
To: localplan@york.gov.uk
Subject: City of York Local Plan Proposed Modifications Consultation - Dunnington Water Tower (H33)
Attachments: Dunnington Water Tower - representations on behalf of Yorvik Homes.pdf; Comments Form.pdf
Follow Up Flag: Follow up
Flag Status: Completed

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Mike,

Further to your email below, I am attaching a copy of our representations on the Local Plan Proposed Modifications (June 2019). These relate to land to the east of Church Balk in Dunnington (also known as land south of Dunnington Water Tower) and are submitted on behalf of Yorvik Homes.

I would be grateful if you could confirm receipt of this submission

Thanks

Graeme



From: localplan@york.gov.uk [mailto:localplan@york.gov.uk]
Sent: 10 June 2019 13:59
Cc: localplan@york.gov.uk
Subject: City of York Local Plan Proposed Modifications Consultation

Dear Sir/Madam,

City of York Local Plan Proposed Modifications (June 2019) Consultation in compliance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

I am writing to inform you about the opportunity to comment on the Proposed Modifications (June 2019) to the City of York Local Plan. The emerging Local Plan aims to support the city's economic growth, provide much needed housing and help shape future development over the next 15-years and beyond. It balances the need for housing and employment growth with protecting York's unique natural and built environment.

The City of York Local Plan is currently in the process of Examination by Independent Planning Inspectors following submission of the plan to the Secretary of State for Housing, Communities and Local Government on 25 May 2018.

We are now publishing a series of proposed modifications to the City of York Local Plan. This consultation gives York residents, businesses and other interested groups the opportunity to comment on additional evidence and modifications to the city's Local Plan prior to the hearing sessions as part of the Examination of the submitted plan. The Planning Inspectors undertaking the Examination have asked for the consultation as they consider the proposed modifications to be fundamental to what they are examining - the soundness and legal compliance of the plan. The consultation only looks at the specific proposed modifications and not other aspects of the plan.

The consultation period for the proposed modifications starts on **Monday 10 June 2019**. All consultation documents will be live on the Council's website (www.york.gov.uk/localplan) and available in West Offices reception and York Explore from this date. The main consultation documents will be available in all other libraries. Please see the Statement of Representation Procedure document.

Representations must be received by **midnight on Monday 22 July 2019** and should be made on a response form. Response forms are available on the Council's website (www.york.gov.uk/localplan) or you can complete an online response form via www.york.gov.uk/consultations. Alternatively, hard copies are available from the Council's West Offices reception, York Explore or from your local library.

Any representations received will be considered alongside the Local Plan Publication draft and the proposed modifications through the Examination in Public. The purpose of the Examination is to consider whether the Local Plan complies with relevant legal requirements for producing Local Plans, including the Duty to Cooperate, and meets the national tests of 'soundness' for Local Plans (see below). Therefore, representations submitted at this stage must only be made on these grounds and, where relevant, be supported with evidence to demonstrate why these tests have not been met.

Legal Compliance

To be legally compliant the plan has to be prepared in accordance with the Duty to Cooperate and legal and procedural requirements, including the 2011 Localism Act and Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

Soundness

Soundness is explained in the National Planning Policy Framework (NPPF). The Inspector conducting the Examination in Public has to be satisfied that the Local Plan is 'sound' –namely that it is:

- **Positively prepared** - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework (NPPF).

To help you respond, we have included Guidance Notes as part of the response form. We recommend that you read this note fully before responding.

At this stage, unless you indicate you wish to appear at the Examination to make a representation you will not have the right to do so. Any written representations made will be considered by the independent Planning Inspectors.

All of the consultation and further evidence base documents published at previous rounds of consultation will also be available on the Council's website at www.york.gov.uk/localplan from 10 June 2019.

If you require any further information on the consultation please contact Forward Planning at localplan@york.gov.uk or on (01904) 552255.

We look forward to receiving your comments.

Yours faithfully



Mike Slater
Assistant Director – Planning and Public Protection

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This communication is from City of York Council.

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City of York Local Plan Proposed Modifications Consultation Response Form

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	Mr
First Name	Matthew	Graeme
Last Name	Gath	Holbeck
Organisation (where relevant)	Yorvik Homes	O'Neill Associates
Representing (if applicable)		
Address – line 1		Lancaster House
Address – line 2		James Nicolson Link
Address – line 3		Clifton Moor
Address – line 4		York
Address – line 5		
Postcode		YO30 6GR
E-mail Address		
Telephone Number		01904 692313

Part B -Your Representation

(Please use a separate Part B form for each issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM3, PM4, PM5, PM20a, PM20d, PM21a, PM21d and PM22

Document:

City of York Local Plan Proposed Modifications & TP1 Addendum

Page Number:

Various

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

No comment

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

Please see attached representation

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

Please see attached representation

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

N/A

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 2018 to inform the Local Plan process. We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't. City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

Signature

Date

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspectors to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

CITY OF YORK LOCAL PLAN PROPOSED MODIFICATIONS
(JUNE 2019)

PREVIOUS HOUSING ALLOCATION H33: LAND TO THE
SOUTH OF THE WATER TOWER, DUNNINGTON (ALSO
REFERRED TO AS LAND TO THE EAST OF CHURCH BALK)

REPRESENTATIONS ON BEHALF OF
YORVIK HOMES

July 2019



Chartered Town Planning Consultants

EXECUTIVE SUMMARY

These representations are submitted on behalf of Yorvik Homes in respect of the proposed allocation of land to the east of Church Balk, Dunnington for housing in the City of York Local Plan.

The site measures around 1.8 hectares and is presently used for grazing. It was previously allocated for housing (Site reference H33) within both the York Local Plan Preferred Options (June 2013) and the Local Plan Publication Draft (September 2014). However, the allocation has not been retained in subsequent versions of the Local Plan following a substantial reduction in the housing target and consequently, the amount of land allocated for housing development across the city.

Representations supporting the allocation of the land at Church Balk (also known as the Dunnington Water Tower site) have been submitted as part of consultation on the various stages of the emerging Local Plan. The representation submitted in March 2018 on the Publication Draft Local Plan provided analysis demonstrating how the Council's overall assessment of its housing requirement was significantly flawed, and casting considerable doubt over whether the proposed housing allocations could deliver the number of dwellings identified.

This representation updates the above analysis in accordance with the Proposed Modifications to the Draft Local Plan, in which the Council include a further reduction of its housing requirement figure from 867 to 790 dwellings per annum, and present additional evidence to justify its approach to defining York's Green Belt.

Our analysis reinforces the representations made in 2018 and holds that;

- The proposed reduction in the housing requirement figure is not justified
- The Draft Local Plan Housing Allocations are inadequate to meet housing need
- The Council has wrongly interpreted national planning policy and guidance in its approach to defining Green Belt boundaries
- The proposed Green Belt boundaries are not defensible as insufficient land is excluded from Green Belt to meet development needs

The representations retain the conclusion that the Plan does not make adequate provision for housing land supply for the 16-year Plan period or the subsequent 5-year period. The proposed Green Belt boundaries will therefore not endure beyond the Plan period and the Plan is therefore not compliant with the NPPF.

Our view is that a substantial amount of additional housing land will need to be allocated if the Council is to meet housing requirements and confirm a permanent Green Belt for York.

As an additional step, the representations also focus on the affordable housing need in the city, which will remain at the same level in spite of the lower overall housing figure put forward by the Council. One of the impacts of the reduced housing target is that the amount of affordable provision will also drop as it becomes a percentage (20-30%) of a much lower figure. Yorvik Homes are experienced housebuilders and have recently delivered a number of schemes within the Yorkshire area where the affordable housing requirement is set as high as 40%. This is based on a discounted for sale model that does not meet the Council's policy for 80% social rent but is ultimately more affordable for the purchaser. A 40% requirement could be met on this site too in order to assist with the delivery of affordable housing within the city and the model of provision is explained further here.

In this context, we maintain there is cause for considering the land at Church Balk for allocation as housing in the Local Plan in accordance with our previous representations which confirm;

- The site continues to represent a viable and deliverable housing site and would provide around 50 homes to make a valuable contribution to York's housing need, 40% of which would be affordable
- The site has a willing landowner committed to making it available in the short- to medium-term, contributing to the delivery of housing within the first 5 years of the Plan
- The development of H33 would create a consistent boundary to the northern edge of the village, following the line that has already been established by suburban housing to the west of Church Balk and will be continued by the expansion of Dunnington Cemetery to the
- The proposed allocation is not considered to impact on the York Moraine or the historic setting of the village.

**CITY OF YORK COUNCIL LOCAL PLAN
PROPOSED MODIFICATIONS JUNE 2019**

**REPRESENTATIONS ON BEHALF OF YORVIK HOMES IN SUPPORT OF
ALLOCATION OF LAND AT CHURCH BALK, DUNNINGTON
FOR RESIDENTIAL DEVELOPMENT**

Contents

1. Introduction
2. Objection to the Proposed Modifications to the Draft Local Plan
3. Planning Context to the Proposed Modifications
4. Local Political Context
5. Assessment of Housing Need
6. Analysis of Proposed Housing Allocations
7. Representations on Green Belt Evidence Base
8. Affordable Housing
9. Conclusions

Appendices

1. Proposed Modifications Consultation Response Form
2. Location Plan
3. City of York Council List of Unimplemented Planning Permissions (as at 1 April 2018)
4. Analysis of Proposed Allocations and Expected Rates of Delivery
5. Affordable Housing Analysis (Yorvik Homes)

Ycb1907.reps.gh
July 2019

1.0 INTRODUCTION

- 1.1 This submission is provided in support of the proposed allocation of land to the east of Church Balk, Dunnington for housing in response to the Proposed Modifications to the Draft Local Plan put forward by City of York Council.
- 1.2 The proposed site measures 1.8ha and is located at the northern entrance into the village (ref. Location Plan, Appendix 2). It is presently used for grazing.
- 1.3 The site was previously allocated for housing (Site reference H33) in both the York Local Plan Preferred Options (June 2013) and the Local Plan Publication Draft (September 2014). However, the allocation has not been retained in subsequent versions of the Local Plan following a substantial reduction in the housing target and consequently, the amount of land allocated for housing development across the city
- 1.4 Detailed justification for the allocation is provided in previous representations made during consultation on the various stages of the emerging Local Plan, including on the Publication Draft in March 2018. Our case remains unchanged other than where updated by these representations.
- 1.5 In drafting the representations on the Proposed Modifications, we are mindful that the Draft Plan is being examined under the transitional arrangements for Plans that were prepared in the context of the National Planning Policy Framework (NPPF) of March 2012.

2.0 OBJECTION TO THE PROPOSED MODIFICATIONS TO THE DRAFT LOCAL PLAN

- 2.1 The February 2018 Publication Draft Local Plan identified a housing need of 14,768 homes over the 16 year Plan period, based on a requirement of 867 homes per annum plus an allowance for under provision for 2012-2017. The net requirement for homes over this period, after taking into account unimplemented consents and windfall development, was stated by the Council to be 8,993 homes.
- 2.2 Our representations to the 2018 Publication Draft Local Plan outlined how the Council's assessment to calculate housing need was fundamentally flawed, and that the Local Plan should be addressing a net housing requirement for 16,452 rather than 8,993 homes within the Plan period.

- 2.3 The current consultation exercise was required by Inspectors after they had requested the Council to provide further evidence to support the submitted 2018 Local Plan. On the new evidence, Inspectors stated in their letter to Council, dated 7 May, that;
- “much of the new evidence is fundamental to the soundness of the Local Plan, particularly the Council’s overall approach to the Green Belt and the assessed OAHN figure”*
- 2.4 The Inspector’s letter went on to require that the public consultation should provide ‘the opportunity for anyone to make a representation on any of the following’:
- *the proposed revised OAHN figure, the supporting evidence and any subsequent proposed modifications to the submitted Local Plan suggested by the Council.*
 - *the updated HRA, the supporting evidence and any subsequent proposed modifications to the submitted Local Plan suggested by the Council*
 - *the proposed changes to the Green Belt boundary, the associated evidence and any other proposed modifications to the submitted Local Plan suggested by the Council.*
- 2.5 This submission provides representation in relation to the revised objectively assessed housing need (OAHN) figure, and updates our analysis on housing need and allocations in line with the Council’s stated annual requirement of 790 dwellings, reduced from 867 in the submitted Draft Plan. It also makes representation on the Council’s evidence to justify its approach to defining York’s Green Belt. This is presented across the following sections;
- **Section 3** outlining the national planning policy context for the Proposed Modifications
 - **Section 4** – summarising the local political context that decided the final content of the Publication Local Plan and subsequent Proposed Modifications
 - **Section 5** – providing a critical assessment of the Council’s approach to housing need and updating our alternative housing requirement
 - **Section 6** – providing an analysis of the proposed housing allocations included in the Draft Plan
 - **Section 7** – making representation on the Council’s approach to defining York’s Green Belt
- 2.6 As an additional step, the representations also consider the affordable housing need in the city and how this site, in particular, could deliver a level of affordable housing that goes beyond the standard 30% requirement for greenfield sites (**Section 8**).
- 2.7 The following consultation documents are considered to be particularly relevant to these representations:
- *City of York Local Plan – Proposed Modifications - June 2019*
 - *City of York Local Plan – Topic Paper 1 (TPI) – Approach to defining York’s Green Belt - Addendum March 2019 (EX/CYC/118) [with Annexes]*

- 2.8 Our assessment continues to demonstrate that the Draft Plan is over-reliant on a small number of strategic housing sites to meet the housing need, and will likely lead to a shortfall in the assumed housing delivery, particularly in the early years of the Plan. We maintain that further sites will need to be allocated to address York’s housing need and deliver a sound Local Plan. In this context, it is considered that Yorvik Homes’ site at Church Balk should be considered for inclusion in the emerging plan.
- 2.9 In terms of the current consultation, this means we retain objections to the Proposed Modifications as outlined in Table I below.

Table I: Objections to the Proposed Modifications

Modification Ref.	Modification Title
PM3	Explanation of City of York Housing Needs
PM4	Policy SSI – Delivering Sustainable Growth for York - Policy
PM5	Policy SSI – Delivering Sustainable Growth for York – Explanation
PM20a to PM20d	Policy HI – Housing Allocations
PM21a to PM21d	Policy HI – Housing Allocations
PM22	Policy HI – Housing Allocations – Explanation

The Plan Period

- 2.10 It is important to note ahead of the following sections that there is an immediate and key issue on the issue of the Council’s Plan period. The Submission Draft Plan proposes a 16-year Plan period starting at 1 April 2017 and extending to 31 March 2033. Beyond 2033, the Plan has made provision for development needs for an additional 5 year period to ensure a “permanent” Green Belt Boundary.
- 2.11 However, over two years have now elapsed since the start of the Plan period of April 2017. It is anticipated by the authors that the Local Plan is likely to be examined during 2019 and 2020. The Plan may well not be adopted until 2021, giving an 11- or 12-year Plan period. Should the Inspectors require further work from the Council, for example related to housing targets, then the Plan period could be less, possibly 10 years. The 5 additional years for ‘permanence’ would give a total Plan period of 16 or 17 years, possibly only 15 years.
- 2.12 We consider that the Plan period should be moved forward to ensure that the development needs for the City can be properly accommodated, and to provide a Green Belt that will endure beyond the Plan period. These representations therefore assume a Plan start date of April 2019 for the purposes of assessing the housing requirement.

3.0 PLANNING POLICY CONTEXT FOR THE PROPOSED MODIFICATIONS

3.1 The primary policy context for considering the proposed modifications is the National Planning Policy Framework and associated National Planning Practice Guidance. The Draft Plan is being examined under the transitional arrangements set out in paragraph 214 of Annex I of the revised 2019 NPPF, and as such the relevant national planning policy is contained in the NPPF of March 2012.

3.2 The NPPF published in March 2012 replaced all previous Planning Policy Guidance notes and some circulars. The Framework sets out the Government's clear intention to facilitate economic growth through sustainable development. In the Ministerial Foreword to the Framework, the Minister for State says:

"The purpose of planning is to help achieve sustainable development.

Sustainable means ensuring that better lives for ourselves don't mean worse lives for future generations.

Development means growth. We must accommodate the new ways by which we will earn our living in a competitive world. We must house a rising population, which is living longer and wants to make new choices..."

3.3 At the heart of the NPPF is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking. The NPPF at paragraph 14 explains that for plan making taking this means:

- *Local planning authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *specific policies in this Framework indicate development should be restricted*

3.4 On the issue of housing, the NPPF is clear about the need for a significant increase in housebuilding to address existing backlog and meet future needs. Local authorities are encouraged to "...**boost significantly**..." the supply of housing. Paragraph 47 of the NPPF states:

To boost significantly the supply of housing, local planning authorities should:

- *use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area*
- *identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5%*

(moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land

4.0 LOCAL POLITICAL CONTEXT

Local Plan Working Group, 10 July 2017

- 4.1 Updated housing requirement figures were reported to the Local Plan Working Group (LPWG) on 10 July 2017, which represented the Council's position in relation to York's annual housing need.
- 4.2 The Officer report to LPWG Members identified an annual housing requirement of 953 dwellings per annum based on evidence provided by the Council's own consultants G L Hearn in the Strategic Housing Market Assessment - Addendum Update May 2017 (the SHMA Update). The 953 figure was composed of a demographic baseline of 867 dwellings, and an adjustment for 'market signals' of 10%.
- 4.3 The LPWG report stated the Plan period should run from 2012 to 2033. However, it also acknowledged that as York is setting detailed Green Belt Boundaries for the first time, it was also necessary to consider the 5 year period beyond 2033, up to 2038, in order to provide for an enduring Green Belt. On the basis of the LPWG report, the housing requirement for the Plan period 2012 to 2033 would therefore be 20,013 (21×953) dwellings. The housing requirement need calculation for the period 2033 to 2038 would be 4,765 (5×953) dwellings.
- 4.4 In calculating the amount of land needed to meet the housing requirement for the LPWG report, the Council had regard to completions to date and unimplemented planning permissions. It also assumed a windfall completion rate of 169 from Year 4 of the Plan.
- 4.5 Taking these factors in the account, the Council's estimate of the remaining housing requirement for the Plan Period presented to the July 2017 LPWG is as follows:

Table 2: Council's estimate of housing requirement as presented to LPWG, 10th July 2017

Plan period 1st April 2012 to 31 st March 2033	
Total Need 2012 -2033 (based on 953)	20,013
Completions 1st April 2012 to 31st March 2017	3,432
Unimplemented Permissions @ 1st April 2017 <i>* We believe this figure is a misprint, and should be 3,578.</i>	3,758*
Windfalls (from Year 4) @ 169 pa	2,197
Requirement Remaining	10,806

4.6 At the LPWG meeting, Members did not agree with the assessment of the housing requirement as presented by Officers and informed by the GL Hearn report. Members instead set the housing requirement at the demographic baseline of 867 dwellings per annum. This was the figure used in the Pre-Publication Draft Local Plan which went out for consultation in September 2017.

Local Plan Working Group, 23 January 2018

4.7 The LPWG on 23 January 2018 considered the representations made on the Pre-Publication draft plan. The Officer's report presented a number of options for the housing requirement based on the degree of risk associated with each option. The report reminded Members they had previously been advised that the Council's independent consultants had estimated the annual housing requirement to be figure of 867, rising to 953 to allow for a 10% market signals uplift. Members had accepted the 867 baseline figure for consultation in the Pre-Consultation Draft Plan, but not the figure of 953.

4.8 Members were also informed that if they were to apply the draft methodology for assessing housing requirement that the Government had consulted on in late 2017, then the housing requirement for the City was estimated to be 1,070 dwellings. They were advised that although this figure was an estimate produced by the draft methodology, it nevertheless indicated the direction of travel anticipated for national planning policy.

4.9 Members were advised of their statutory duty to ensure the Submission Draft Plan meets the test of "soundness". Officer advice was that the direction of travel in national policy indicated that if the site proposals previously consulted on were increased this would be a more robust position. Members were clearly advised that an increase in the

supply of housing would place the Council in a better position for defending the Plan proposals through the Examination process.

- 4.10 Members were also advised of the options for increasing the housing supply that were set out in four tables in the LPWG report. Those options ranged from inclusion of MOD sites (Table 1); the enlargement of allocated strategic sites (Table 2); the inclusion of previously rejected sites that, following further assessment work, Officer's felt should be reconsidered (Table 3); and new sites emerging in response to the consultation on the Pre-Publication draft plan.
- 4.11 Members rejected any proposal to increase the housing requirement set out in the Draft Plan, and approved only the inclusion of the MoD sites in Table 1 of the LPWG report.

Council Executive, 25 January 2018

- 4.12 The recommendations of the LPWG were reported to the Council Executive on 25 January 2018. Representatives of the promoters of the three largest Strategic Housing sites addressed the Executive:- Site ST7, Land East of Metcalf Lane (845 units); Site ST14, Land West of Wigginton Road (1,348 units); and Site ST15, Land West of Elvington Lane (3,339 units). The representatives informed Members that their sites, as proposed in the Publication Draft Local Plan, were not viable or deliverable without additional land and some increase in the number of dwellings proposed for each. They requested that changes be made to the Draft Publication Local Plan before it went to consultation, but these requests were subsequently ignored by members.

Local Plan Publication Draft, February 2018

- 4.13 The Publication Draft Plan proposes a 16-year plan period with a start date of 1st April 2017. This deviates from the Officer's report to LPWG Members, which had assumed a Plan start date of 2012, and changes the basis of the housing requirement calculation. Completions are no longer included in this calculation since the start date of the Plan is essentially Year 0 in the calculation. Instead, the Council include an allowance for backlog (under provision) for the period 2012 to 2017, which is set at 56 units per annum. With the annual base requirement of 867 dwellings, this gives a total annual requirement of 923 dwellings per annum.
- 4.14 Taking account of these changes, the housing requirement as proposed in the Submissions Draft Plan is set out in Table 3:

Table 3: Housing Requirement - 2018 Local Plan Publication Draft

Plan period 1 st April 2017 to 31 st March 2033	
Total Need 2017 - 2032/33 (based on 867 + 56 = 923 dwellings per annum)	14,768
Unimplemented Permissions @ 1st April 2017	3,578
Windfalls (from 2020/2021) @ 169 pa	2,197
Requirement to be provided through allocations	8,993

- 4.15 In addition, to ensure what the Draft Plan considers to be enduring Green Belt boundaries, additional land was allocated to meet the annual base requirement of 867 dwellings per annum for the 5-year period between 2033 and 2038. This effectively meant that the overall housing requirement to be provided through allocations was assessed by the Council to be 13,328 homes (8,993 + (867 × 5)).

Draft Local Plan – Submission to Secretary of State for Examination

- 4.16 The Publication Draft Local Plan was submitted to the Secretary of State for Housing, Communities and Local Government on 25 May 2018 for independent examination.

- 4.17 Following submission, the Inspectors wrote to the Council on 24 July 2018 with their initial observations on the supporting documents and evidence for the Plan. The letter commented that;

'On the face of it, and without prejudice to any conclusions we might reach following more detailed exploration through the examination, the SHMA Update appears to be a reasonably robust piece of evidence which follows both the NPPF and the national Planning Practice Guidance. The plan, however, aims to provide sufficient land for 867 dpa'

- 4.18 The Inspectors' letter then went on to query why the Council had settled on a figure of 867 dwellings per annum, without including the 10% uplift as per the evidence provided by G L Hearn in the SHMA Update.

'...the Council accepts the figure of 867 dpa, but does not accept the conclusions of the SHMA Update concerning the uplift or the consequent OAN figure of 953 dpa. The reasons given for the latter appear to relate to the challenge of the 'step-change' in housing delivery needed. We also note that it says the Council considers GL Hearn's conclusions to be "... speculative and arbitrary, rely too heavily on recent short-term unrepresentative trends and attach little or no weight to the special character and setting of York and other environmental constraints".

Precisely what it is about the SHMA Update that the Council considers "speculative and arbitrary" is not apparent to us. We are also unsure why you consider the SHMA Update to be "too heavily reliant on recent short-term unrepresentative trends". We therefore ask you to elaborate on these shortcomings in your evidence.

Difficulty in housing delivery and the existence of environmental constraints have no place in identifying the OAN. If such matters are to influence the plan's housing requirement, which you will appreciate is a different thing to the OAN, the case for this must be made and fully justified. At present, unless we have missed something, it is not. Overall, as things presently stand, we have significant concerns about the Council's stance regarding the OAH.

- 4.19 In response to these queries the Council commissioned another update of the OAHN, produced by G L Hearn in January 2019 as the 'City of York – Housing Needs Update'. This Update arrived at a housing requirement of 790 dwellings per annum based on the 2016 Sub National Population Projections and 2016 based Household Projections, constituting a significant reduction compared with previous estimates.
- 4.20 In submitting the Update to the Inspectors for consideration, the Council's letter of 29 January 2019 stated that;
- The enclosed SHMA Update report advises that York's OAN is 790 dwellings per annum. This is based on a detailed review of the latest published evidence including the national population and household projections and the latest mid year estimate. The review has been undertaken based on applying the requirements of the National Planning Practice Guidance in relation to the assessment of housing need, under the 2012 NPPF. This confirms to the Council that the 867 dwellings per annum proposed in the submitted Plan can be shown to robustly meet requirements.*
- 4.21 However, since the January 2019 letter, the Council has elected to adopt the lower figure of 790 to be taken forward in the Local Plan as its OAN. It has also used a lower figure of 32 dwellings per annum to account for backlog for the period 2012 to 2017 to correspond with the reduced OAN.
- 4.22 Taking account of these changes, the housing requirement as outlined in the Proposed Modifications to the Local Plan (June 2019) are set out in Table 4:

Table 4: Housing Requirement - 2019 Proposed Modifications to the Local Plan

Plan period 1 st April 2017 to 31 st March 2033	
Total Need 2017 - 2032/33 (based on 790 + 32 = 822 dwellings per annum)	13,152
Unimplemented Permissions @ 1st April 2018 less 10% for non-implementation (3,345 x 0.9)	3,010
Windfalls (from 2020/2021) @ 169 pa	2,197
Requirement to be provided through allocations	7,945

4.23 In addition to the housing land requirement for the Plan period set out in Table 4, the Council must also allocate land for the period 2033 to 2038 to ensure what it considers to be enduring Green Belt boundaries. Using the Council's annual figure of 790 units as per the Proposed Modifications, the requirement for the 5-year period beyond 2033 would be 3,950 dwellings. This means that the overall housing requirement to be provided through allocations as assessed by the Council is 11,895 units (7,945 + (790 x 5)).

5.0 ASSESSMENT OF HOUSING NEED

5.1 We consider that the Council's assessment of the housing requirement and the allocations set out in the Draft Plan to be inadequate for the following reasons:

- (i) The use of 2016 population and household projections is contrary to Government guidance
- (ii) The housing requirement is too low
- (iii) The calculation of completions since 2012 is too high (i.e. the Council's estimate of backlog is too low)
- (iv) Outstanding commitments include student housing that should be excluded
- (v) The assumptions on windfalls are questionable and should not be treated as a component of the Plan

(i) *The 2016 Household Projections*

5.2 The January 2019 Housing Needs Update assesses the OAHN for the district to be 790 dwellings per annum. This is a figure derived using the ONS' 2016-based Sub-National Population Projections, the 2016-based Household Projections, and the latest mid-year estimates. We disagree with this figure for several reasons.

5.3 The Council's Proposed Modification to the housing requirement from 867 to 790 is contradictory to the advice given by the Council in its letter of 29 January 2019 to the Inspectors, which stated that the Housing Needs Update work was undertaken to:

"seek to confirm that the 867 dwellings per annum proposed in the submitted Plan can be shown to robustly meet requirements".

5.4 Fundamentally, the way the OAHN has been calculated is contrary to National Planning Policy. This is confirmed by the Government in the updated Planning Practice Guidance (as revised on 20 February 2019), where Paragraph 005 Ref Id. 2a-005-20190220 states that;

"The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes".

5.5 Accordingly, whether using the 'old' or 'new' standardised methodology, it is clear that the Government has rejected the 2016 projections and consequently their use in the calculation of an LPA's annual housing requirement. From a practical point of view, given the unequivocal stance of the updated Planning Practice Guidance, the Government is not going to revisit the old guidance to make clear that the 2016 projections have been rejected. This is particularly the case of plans being prepared under the "transitional arrangements" whereby Local Plans submitted ahead of January 2019 will be assessed on the basis of the old methodology and importantly the evidence base it relied upon at that time.

5.6 The shortcomings of the use of the 2016 population and household projections are acknowledged in the Housing Needs Update, which states at paragraphs 2.20 and 2.21 that:

"The main change is the period from which household formation rates trends have been drawn. Previously these were based on trends going back to 1971 but in the most recent projections trends have only been taken from 2001.

"It is argued that by focussing on shorter term trends ONS have effectively locked in deteriorations in affordability and subsequently household formation rates particularly within younger age groups in that time."

5.7 In addition, the Housing Needs Update highlights the pressure on house prices in the City, with paragraphs 4.1 and 4.2 stating that;

"As shown in the figure below, the median house price in York sits at £230,000, near parity with England's median value of £235,995. The City is also more expensive than the North Yorkshire and Yorkshire and Humber equivalents of £210,000 and £157,500 respectively."

“Perhaps even more interesting to note is that lower quartile house prices in York exceed that of England by £30,000 despite having a similar overall median house price. Relatively higher values within a lower quartile housing range suggests that those with lower incomes (such as first-time buyers) feel greater housing pressure and are less likely to be able to afford a property.”

- 5.8 On the issues of affordability, the Housing Needs Update is even more damning. Paragraphs 4.17 and 4.19 state;

*At the median level, York has the highest affordability ratio, and thus the least affordable housing, relative to surrounding North Yorkshire, Yorkshire and Humber, and England. In addition, the affordability ratio in York has also increased the most in the past five years relative to the other geographies – **indicating a significant worsening in affordability...**”*

“The affordability statistics and the market signals reveal that as a whole, York is becoming increasingly more unaffordable and that a market signals adjustment in the City is necessitated.”

- 5.9 The Council's reliance on the 2016 population and household projections is not only contrary to Government guidance, but also flies in the face of the evidence demonstrating the very high demand for housing in the face of diminishing supply. The evidence points overwhelmingly to strong and entrenched market signals issues across York, as evidenced by worsening affordability.
- 5.10 Fundamentally, use of 2016 projections promotes and compounds a low housing requirement figure that contradicts the Government's objective of significantly boosting the supply of housing particularly in areas of high housing need such as York.

(ii) Housing Need

- 5.11 In our representations on the Preferred Sites Consultation September 2016, we included an Assessment of Housing Need prepared By Nathaniel Lichfield and Partners (NLP). That Assessment established the scale of need for housing in the City of York based upon a range of housing, economic and demographic factors and trends using NLP's HEaDROOM framework.
- 5.12 The Assessment found that that the objectively assessed housing need for the City of York was in the range of 1,125 to 1,255 dwelling per annum. The approach allowed for the improvement of negatively performing market signals through the provision of additional supply, as well as helping to deliver affordable housing and support economic growth. Using this range would have ensured compliance with Paragraph 47 of the NPPF by significantly boosting the supply of housing. It would also have reflected

Paragraph 19 of the NPPF, which seeks to ensure the planning system does everything it can to support sustainable development.

- 5.13 Subsequent to the NLP Assessment, other independent housing need assessments have been produced which support its findings. A review of local plan housing targets prepared by Regeneris Consulting (October 2017) in support of an outline planning application for up to 516 houses in Acomb (ref: 18/02687/OUTM) concluded that the demographic starting point should be 890 dwellings per annum and, with adjustment for economic growth and market signals, the final OAHN was in the region of 1,150 dwellings per annum.
- 5.14 In September 2017, the Government consulted on a standard methodology for assessing housing need that every Local Planning Authority would have to use when preparing a Local Plan. The methodology uses the projections of household growth as the demographic baseline for every local authority area. To this is added an adjustment to take account of market signals in house prices. Along with the Consultation Paper the Government included a calculation of the housing requirement for each local authority in the country. The calculation for York was a housing requirement of 1,070 dwellings per annum. The consultation paper explained that this should be treated as the starting point for assessing the housing requirement.
- 5.15 Taking a robust and conservative approach, the Government's figure of 1,070 dwellings per annum is used in our assessment of the housing requirement for the Local Plan period.

(iii) Calculation of Completions – Backlog

- 5.16 The Council has underestimated the scale of the backlog and the Council's annual allowance of 32 dwellings, amounting to just 512 units over the 16-year Plan period, is too low.
- 5.17 To calculate the backlog, our assessment uses the figure of 953 – the annual housing requirement recommended by the Council's independent consultants, G L Hearn for the period from 2012 in the 2017 SHMA Update. We then subtract completions in each year from 2012/13 to 2018/19 to obtain the backlog. It also takes the following factors into account:
- The Local Plan must demonstrate it can provide deliverable sites for the 5-year tranches within the plan period. Government guidance advises that the calculation of the 5-year supply must take account of any shortfall from previous years. How far back the shortfall should be included is a matter of judgement. There is a point at which unformed households from previous years have been permanently

displaced and therefore the need to accommodate them has passed. For the purpose of this calculation, and for some degree of convenience, the period from 2012 will be used as the basis of calculating the backlog. (However, using the RSS requirement of 850 dwellings per annum for the period 2008 to 2012 the backlog for that period was 1,607 dwellings, which is essentially 'written off').

- In order to calculate the backlog accurately, it is necessary to analyse the housing completion data contained within the Council's Annual Housing Monitoring Updates. These would suggest that, after many years of under provision, the total net dwelling gains between 2015/16 and 2017/18 provided a surplus against the Council's assessment of housing need. However, these figures must be treated with caution as they include purpose built student accommodation units which have a distorting effect on the data. For instance, the Council's total dwelling gains figures of 1,121 for 2015/16 and 1,296 for 2017/2018 respectively included 579 and 637 student units. To provide a more realistic and robust analysis, our assessment of the completion backlog excludes student units.

5.18 It should be noted that the Council has included student units in their completion and commitments figures based on the definition of dwelling units used in the DCLG General Definition of Housing Terms. However, this is a misreading of the definition which excludes communal establishments from being counted in the **overall housing supply statistics**, but adds that all student accommodation whether it consists of communal halls of residence or self-contained dwellings, on or off campus, can be included towards the **housing provision** in local development plans. Government guidance (which is more recent than the DCLG dwelling definition) is that student accommodation units can be included within the housing supply, but only "...based on the amount of accommodation it releases in the housing market." (*Planning Practice Guidance Reference ID: 3-042-20180913*).

5.19 The Council has not produced any evidence to demonstrate how market housing supply has been increased by students transferring from traditional private sector shared housing. Indeed, the available evidence presented in the City of York Council Strategic Housing Market Assessment June 2016 is that new purpose-built student accommodation has not displaced students from market or family housing. Paragraph 10.67 of the SHMA states:

"We have undertaken some qualitative research on the student housing market. This revealed there was an increase in capacity as new purpose-built accommodation has been built on and off campus. However, it was discovered that this did not reduce demand for traditional private sector shared housing."

5.20 In addition, the Council has not demonstrated that students form part of the objectively assessed housing need nor demonstrated that new student housing accommodation would contribute towards meeting the housing requirement. Furthermore, case law has established that in these circumstances purpose built student accommodation cannot count towards the housing supply (*Exeter City Council v Secretary of State for Communities and Local Government, Waddeton Park Limited, The R B Nelder Trust. Case No: CO/5738/2104*).

5.21 Taking account of the above, our calculation of the housing completion backlog for 2012 to 2019 is set out in Table 5:

Table 5: Housing completion backlog for the period 2012-2019

Year	Actual completions	Less student units	Net C3 dwelling units	2016 SHMA recommended figure	Backlog/ Surplus	Housing delivery test indicator
2012/13	482	0	482	953	-471	50.6%
2013/14	345	0	345	953	-608	36.2%
2014/15	507	0	507	953	-446	53.2%
2015/16	1,121	579	542	953	-411	59.9%
2016/17	977	152	825	953	-128	86.6%
2017/18	1,296	637	659	953	-294	69.2%
2018/19	449	40	409	953	-544	42.9%
Total	5,177	1,408	3,796	6,671	-2,902	

(iv) Commitments

5.22 We have obtained a list of the 3,345 unimplemented planning permissions (as at 1 April 2018) that the Council has used to inform its housing requirement figure as included in the 2019 Proposed Modifications (ref. Table 4). The list, included as Appendix 3, shows that the figure of 3,345 includes 95 student units which, for the reasons stated above, should not be included in the housing provision figures. This reduces the commitment figure to 3,250. A further discount of 10% should be applied to account for non-implementation of a proportion of these commitments, giving a more robust figure of 2,925 dwellings for outstanding commitments.

(v) Windfalls

5.23 The Council's assessment of housing provision includes an allowance for 169 windfalls per annum from Year 4 of the Plan (2020/2021), totalling 2,197 units. Guidance in Paragraph 48 of the NPPF is that windfalls can be included in the calculation of five-year supply, i.e. not as a source of housing supply across the Plan period. This is because the supply of windfalls is variable and including it across the plan period does not provide the certainty of delivery compared with actual allocations. In addition, once the plan is adopted and housing allocations confirmed, the pressure to deliver housing through windfalls should decrease. Other Authorities, most recently Scarborough Borough Council, have adopted this approach whereby a windfall allowance is identified across the plan period but treated as a flexibility allowance to the allocations and not included in the housing provision. The Inspector for the Scarborough Local Plan Examination in Public endorsed this approach and the plan has now been adopted.

Conclusion on Housing Requirement

5.24 Taking all the above factors into account, our estimate of the housing requirement for the 16-year plan period, compared with the Council's estimate (but adjusted to a 2019 start year), is set out in Table 6:

Table 6: Comparison estimates of housing requirement, 2019-2035

Plan period 1 st April 2019 to 31 st March 2035	CYC 2018 Publication Draft Plan (adjusted to 2019 start year)	CYC 2019 Proposed Modifications (adjusted to 2019 start year)	Our Estimate
Total Need 2019- 2033 (16 Years)	13,872 (based on 867 dpa)	12,640 (based on 790 dpa)	17,120 (based on 1,070 dpa)
Backlog	896 (56 dpa x 16)	512 (32 dpa x 16)	2,902* (Table 5)
Gross Requirement	14,768	13,152	20,022
Unimplemented Permissions	3,578 (as at 1 April 2017)	3,010** (as at 1 April 2018)	2,925*** (para 5.22)
Windfalls (from 202/21) @ 169pa	2,197	2,197	0
Net Requirement	8,993	7,945	17,097

* Excluding student accommodation

** Includes 10% non-implementation discount

*** Includes 10% non-implementation discount and excludes student accommodation

- 5.25 It is evident from this analysis that the Council's estimate of the housing requirement for the plan period of 2017-2033 is significantly flawed, with a shortfall of over 9,000 units between the Council's requirement as set out in the Proposed Modifications and our critically assessed housing requirement of 17,097 units.
- 5.26 In addition to meeting the housing land requirement during the Plan period, the Council must also look beyond this period to establish an enduring Green Belt boundary. The Council has sought to address this by allocating housing land for the period 2033 to 2038. Using the Council's annual figure of 790 units as per the Proposed Modifications, the requirement for the 5-year period beyond 2033 would be 3,950 dwellings. However, using the Government's figure of 1,070 units per annum provides a requirement as 5,350 dwellings. As such, this would provide an overall housing requirement of 22,447 to be provided through allocations, and not 11,895 as set out in Paragraph 4.23 above.
- 5.27 Given this to be the case, it is likely that significant additional allocations will be required to address the shortfall between the Council's professed housing need and the actual housing requirement for York.

6.0 ANALYSIS OF PROPOSED HOUSING ALLOCATIONS

Meeting Housing Demand and Delivery Targets

- 7.1 The Draft Local Plan places a heavy reliance on the allocated strategic sites to deliver the required number of dwellings over the plan period. Draft Policy H1 relates to housing allocations and includes at Table 5.1 a list of the proposed strategic and general housing allocations, which the Council's Proposed Modifications PM18 and PM19 seek to amend by deleting the Strensall Barracks sites H59 and ST35. Incorporating these Proposed Modifications, the proposed housing allocations are identified as having potential to deliver 14,440 houses, although not all would come forward during the plan period.
- 7.2 Following removal of Strensall Barracks, a total of 15 strategic sites are assessed as contributing 12,988 houses, with standard housing allocations assessed as yielding just 1,452 units. The strategic sites therefore make up around 90% of the identified total housing yield from the allocated sites. However, there is no certainty over the rate of delivery that can be achieved on some of these sites.
- 7.3 As an example, Strategic Site ST1 (British Sugar) has been allocated for 1,200 homes, which the Draft Plan states will all be delivered within the lifetime of the plan. However,

this site remains undeveloped having lain vacant and derelict since 2006, and it is understood development could only commence following a 3-year scheme of remediation. Outline planning consent (15/00524/OUTM) to develop the site for up to 1,100 homes was granted in September 2018 following a Public Inquiry. There have yet not been any Reserved Matters submissions, and it will take some time to resolve the planning issues and obtain detailed planning permission for the site. This will extend the already lengthy lead-in time for the development of the site, which likely remain largely undeveloped for many years, with the first completions not likely until at least 2023.

- 7.4 The difficulty in bringing forward Strategic Site ST5 (York Central) is also well documented. The Emerging Plan envisages 1,700 new houses being built on this site within the 1 to 21 year period, and at a projected density which ranges between 95-125 homes per hectare. However, as with the British Sugar site, there is considerable doubt over York Central's viability and deliverability. An outline application (18/01884/OUTM) for a mixed-use development including up to 2,500 homes was approved at Planning Committee in March, but the S106 Agreement has not yet been completed and again it will take some time for Reserved Matters to be approved. There will also be a significant lead-in time to address remediation and access issues before development can commence.
- 7.5 There is also a question over how the supply of new homes at York Central will be matched with (the existing) housing demand. The 2016 SHMA for York reveals that the highest level of demand for market housing in the city is for 2 and 3-bedroom family homes whereas the outline planning application approved by Planning Committee in May 2019 suggests that 70% of the dwellings on York Central will be apartments. There is also significant unmet demand for bungalows amongst retirees seeking to downsize.
- 7.6 According to local letting agents surveyed for the SHMA, the crucial gap in supply is for good quality family homes. There is no perceived shortage of flats or apartments. Based on projections of additional households between the years of 2017 and 2032, the SHMA also indicates that greatest need for market dwellings is for 3-bedroom homes, at 39.2% of additional dwellings. This is followed by two-bedroom homes (37.7%) and 4-bedroom homes (16.5%). The need for 1-bedroom dwellings is comparatively low at 6.6%.
- 7.7 Whereas the Plan appears to be reliant on the higher densities provided by apartment living to make a significant contribution to the overall supply of housing, the evidence presented in the SHMA suggests that this is not where the main area of demand lies.

- 7.8 To deliver a wide choice of high-quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, the advice contained within paragraph 50 of the NPPF is that local planning authorities should:
- plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)
 - identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand
- 7.9 In its current form, it is not clear how the allocated sites and their associated yields will address this requirement. In addition, the Council powers to secure the proposed densities are weak. Given just these two examples, it is clear there must be significant concern that overreliance on housing delivery from the strategic sites will undermine the potential for the Local Plan.
- 7.10 Extending analysis to the rate of deliverability of all the proposed housing allocations also raises doubts over whether sufficient housing land and sites is incorporated in the Draft Plan.
- 7.11 Taking the sites proposed for allocation as identified in Table 5.1 of the Publication Draft Local Plan, we have applied what we believe to be realistic assumptions about their potential rate of delivery based on the information provided in the table and other sources. For example, we assume no delivery from the British Sugar site in the first 5 years of the Plan for the reasons outlined in Paragraph 6.2 above. Our assessment of the allocations, which is included at Appendix 4, indicates the following rates of delivery:

Table 7: Anticipated rates of housing delivery from proposed allocations

Timescale	Units
Years 1-5	3,054
Years 6-10	4,562
Years 11 to 16	3,868
Sub-total 16-year plan period	11,484
Years 17 to 21	2,448
Total 21-year period	13,932*

**Does not add to 14,440 as delivery for Site ST15 and ST36 extends beyond 2038*

7.12 This simple analysis demonstrates that the proposed allocations would only be capable of yielding around 11,500 units within the 16 year plan period, representing an under-delivery of over 5,600 units from our assessed housing requirement of 17,097 dwellings (Table 6). For the 5-year period following the Plan period, the shortfall would be 2,902 dwellings from our assessed requirement of 5,350 dwellings. Again, these housing delivery issues serve to reinforce the point that further sites must be allocated to deliver a sound Local Plan for York.

Five Year Land Supply

7.13 Our analysis demonstrates that the housing land requirement for the 16-year plan period is significantly flawed. Of equal concern is the lack of supply in the early years of the plan required to '*significantly boost the supply of housing*'. Our assessment of the 5-year supply position is set out in Table 8, below.

Table 8: Our assessment of 5-year land supply

		Assessment using Council's Housing requirement of 790		Assessment using Government Housing requirement of 1,070	
A	Requirement	(5×790)	3,950	$(5 \times 1,070)$	5,350
B	Plus Shortfall 2012-2019	(7×32)	224		2,902
C	Sub-Total		4,174		8,252
D	20% buffer	$(C \times .2)$	835	$(C \times .2)$	1,650
E	Total 5-year Requirement	C + D	5,009	C+D	9,902
F	Annual requirement	$(E \div 5)$	1,002	$(E \div 5)$	1,980
G	Supply (Commitments)		3,010		2,925
H	Windfall		338		0
I	5-year supply	$(G+H) \div F$	3.34 years		1.48 years
J	Allocations Years 1 to 5		3,054		3,054
K	Potential supply	G + H + J	6,402		5,979
L	Potential 5-year supply	$(K \div F)$	6.39 years		3.02 years

7.14 Our assessment is generally in line with accepted practice. The steps in our assessment are:

- I. To provide a fair indication of the range of what the 5-year housing land supply position might be, we use both the Council's housing requirement figure of 790 dwellings per annum and our assessment of the annual requirement of 1,070 dwellings per annum to arrive at a five-year requirement.
- II. We then add the undersupply assessed against each of the housing requirement figures for the period of 2012 to 2019. This is known as the "Sedgefield Method" of calculating the 5-year supply and assumes any undersupply is made up in the 5-year calculation period and not spread over the remaining years of the Local Plan. This is the approach favoured by National Planning Guidance which recommends:

The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5-year plan period (the Sedgefield approach).
(NPPG, Paragraph 035, Reference ID 3-035-20140306)

- III. The Council has failed the housing delivery test for 6 of the last 7 years when housing delivery has fallen below 85% of the 2016 SHMA requirement (ref. Table 5 above). In these circumstances, the NPPF (Paragraph 47) recommends that a 20% buffer should be added to the housing requirement.
- IV. We take our and the Council's respective figures for unimplemented permissions / housing commitments / windfall allowances

7.15 Taking these steps into account, we provide two variants of the 5-year supply position. In the first, our assessment assumes the supply consists of just the existing commitments. This gives a 5-year supply of:

- 1.48 years based on the Government's estimate of an annual housing requirement need of 1,070 dwellings per annum and our assumptions on backlog and commitments.
- 3.34 years based on the Council's assessed housing requirement of 790 and their assumption on backlog, commitments and windfalls

7.16 In the second variant, we have included our estimate of supply arising from the proposed allocations. In this scenario, our estimate of supply from allocated sites in the first 5 years of the Plan is 3,054 dwellings. When this is added to the assumptions about the supply from existing commitments the supply position is:

- 3.02 years based on our figures

- 6.39 years based on the Council's figures

7.17 The scale of the deficit in land supply identified by the 5-year calculation is significant not only in terms of the need to identify more land but also in terms of the longevity of undersupply. By any reasonable assessment, there has been a significant shortfall in the provision of housing every year since 2012 and for the period before that.

7.18 The calculation above demonstrates the high level of latent and unmet demand in York, and the precarious nature of the housing supply. In order to achieve a balance between the housing requirement and housing supply the requirement would have to fall significantly. On the basis of the background evidence prepared for the Local Plan, this scenario is highly unlikely.

7.19 Alternatively, the requirement/supply balance could be achieved by increasing the supply on the existing allocated sites in the 5-year period. Again, on the basis of the evidence available this is less likely. This is because a significant proportion of the draft housing allocations are large sites that will take several years before they deliver a significant increase in housing supply and our assumptions already assume a realistic rate of delivery from each site. There is only so much delivery the market can take or accept from each site. Increasing the amount of housing on the large strategic sites is likely to mean that more housing is delivered later in, or even after, the Plan period and not in the early years of the plan. That rate of delivery is unlikely to increase without a fundamental adjustment to the business model of housebuilders and developers. **Providing additional allocations that include sites such as the Church Balk site that can deliver houses in the first 5 years of the plan period will greatly assist in addressing that shortfall.**

7.20 Such an approach would be compliant with National Planning Guidance which advises:

"To ensure that there is a realistic prospect of achieving the planned level of housing supply, the strategic policy-making authority should bring forward additional sites from later in the plan period, over and above the level indicated by the strategic policy requirement, and any shortfall, or where applicable the local housing need figure. These sites will provide additional flexibility and more certainty that authorities will be able to demonstrate a sufficient supply of deliverable sites against the housing requirement."

Paragraph: 037 Reference ID: 3-037-20180913

7.0 REPRESENTATIONS ON GREEN BELT EVIDENCE BASE

Planning Policy Context

8.1 Before proceeding to address the updated Green Belt evidence base, we set out what we consider to be the main policy guidance for assessing the evidence base.

8.2 Under the heading Protecting Green Belt Land, the NPPF reaffirms the longstanding aim of Green Belt policy which is to:

“Prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

8.3 The NPPF states the purposes of including land in the Green Belt which are:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

8.4 Paragraphs 83 to 85 are particularly relevant to the York Daft Local Plan. Paragraph 83 states:

“Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period”.

8.5 Paragraph 84 emphasises that:

When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.

8.6 Paragraph 85 expands on the issue of green belt permanence referenced in paragraph 83. It adds that when defining boundaries, local planning authorities should (inter alia):

- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;....*
- *where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;...*
- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period;...*

8.7 The advice in paragraphs 83 to 85 of the 2012 NPPF is broadly retained in paragraphs 138 to 139 of the 2019 NPPF.

Regional Policy

- 8.8 The saved policies YH9 and Y1 of the RSS relating to Green Belt remain extant and therefore carry weight. They state:

Policy YH9, Green Belts

“C. The detailed inner boundaries of the green belt around York should be defined in order to establish long term development limits that safeguard the special character and setting of the historic city.”

Policy Y1, York Sub-Area Policy

“Plans, strategies, investment decisions and programmes for the York sub area should:

C Environment

- 1. In the city of York LDF, define the detailed boundaries of the outstanding sections of the outer boundary of the York Green Belt about 6 miles from York City Centre and the inner boundary in line with Policy YH9C”*
- 2. Protect and enhance the nationally significant historical and environmental character of York, including its historic setting, views of the Minster and important open areas.”*

Response to the Council's Evidence Base

- 8.9 In their letter of 24 July 2018 to the Council, the Inspectors commented:

As we understand it, there has at no time been an adopted development plan for York with an adopted policies map identifying the Green Belt, or at least not its boundaries. The Local Plan now sets out to rectify this. It proposes to designate land as Green Belt and to delineate Green Belt boundaries.

- 8.10 The Inspectors' letter posed the following questions to the Council:

- i. For the purpose of paragraph 82 of the NPPF, is the Local Plan proposing to establish any new Green Belt?*
- ii. If so, what are the exceptional circumstances for so doing, and where is the evidence required by the five bullet points set out at paragraph 82 of the NPPF?*
- iii. If not, does the Local Plan propose to remove any land from an established Green Belt? If it does, is it necessary to demonstrate that exceptional circumstances exist to warrant that approach? Or is it the case that the Local Plan establishes the Green Belt boundaries for the first time, such that the exclusion of land from the Green Belt – such as at the 'garden villages', for example – is a matter of establishing Green Belt boundaries rather than altering them, in the terms of paragraph 83 of the NPPF?*

Notwithstanding all of the above, it is not clear to us how the Council has approached the task of delineating the Green Belt boundaries shown on the Policies Map submitted. Unless we have missed something, no substantive evidence has been provided setting out the methodology used and the decisions made through the process. We ask that the Council now provides this.

- 8.11 In response to these questions, the Council has produced an extensive Addendum to Topic Paper 1 ('TPI Addendum') to provide further evidence explaining its approach to defining York's Green Belt Boundaries. For reasons outlined in previous representations, we believe the Council has addressed the Green Belt issues on an erroneous assumption that is highlighted by the questions the Inspectors have posed. This erroneous approach is evident in Section 2 of the TPI Addendum where the Council seek to set out the scope of the addendum.
- 8.12 Our response to the Inspectors' questions, having regard to the Addendum, is set out below following the order of the questions in paragraph 7.10 above, as follows;
- i. We believe that the Local Plan is not trying to establish new Green Belt, nor should it be seeking to establish new Green Belt. The role of the Local Plan is clearly set out in saved regional planning policies and has been accepted and endorsed by Inspectors on appeal. The purpose of the Local plan is to define the inner and outer boundaries.
 - ii. Given our answer in (i), the Council does not have to demonstrate any exceptional circumstances for establishing new Green Belt
 - iii. We believe this question encapsulates the key issue for the Local Plan in respect of the Green Belt. Regional Policy has established the general extent of the Green Belt. We agree with the second part of the Inspectors' question, that in establishing the Green Belt boundaries for the first time, it follows that the exclusion of land from the Green Belt – such as for the Church Balk site, for example – is fundamentally a matter of establishing Green Belt boundaries rather than altering them, in the terms of paragraph 83 of the NPPF.

It will help in understanding this process to be aware that there is a key omission in saved Regional Policy YH9C. The full wording of Policy YH9C in the 2008 Approved Regional Guidance for Yorkshire and the Humber was:

*The detailed inner boundaries of the Green Belt around York should be defined in order to establish long term development limits that safeguard the special character and setting of the historic city. **The boundaries must take account of the levels of growth set out in this RSS and must also endure beyond the Plan period.***

The sentence in bold, for whatever reason, never made it into the save policy – possibly because it refers to “levels of growth” that were not saved. However, the intention is clear, and the inescapable logic of the current process is that in defining the detailed Green Belt boundaries, the Council must exclude land required to meet the growth of the City.

As the preparation of the Local Plan has been drawn out of the past 20 years, some considerable confusion surrounds the status of the Green Belt. Much of the commentary relating to the Green Belt from both the Council and other respondents on the Local Plan consultations, speak from a position that assumes the Green Belt boundaries are fixed in an adopted plan. The further assumption is that any suggestion that sites should be allocated for development will result in land being **taken out** of the Green Belt (in which case the second sentence of paragraph 83 of the NPPF would apply: i.e. Green Belt boundaries should only be altered in exceptional circumstances).

This is, however, an erroneous assumption because the Green Belt boundaries around York are being defined (or established) for the first time. They are not being altered. In this case, paragraph 85 of the NPPF is the key advice to be considered. In defining/establishing boundaries the Council must meet the identified requirement for sustainable development, i.e. it must allocate land to meet identified needs for housing, employment, leisure and other needs. This is precisely what the missing sentence of Policy YH9C was referring to.

In other words, it is not a question of what land **should be taken out of the Green Belt**. The Council is at the point of deciding what land **should not be included in the Green Belt** in order to meet the identified requirements for sustainable development.

- 8.13 The Council has therefore misunderstood and wrongly applied NPPF policy. This misunderstanding is captured in paragraph 2,13 of the Addendum which states:

This addendum also explains why exceptional circumstances exist to justify alterations to the general extent of the Green Belt, in order to bring forward strategic sites to meet development needs.

- 8.14 The erroneous approach taken by the Council to defining the Green Belt boundaries has serious consequences in its attitude to meeting the needs for sustainable development over the Plan period. It has resulted in an overly restrictive approach to identifying land for housing and other development needs on the mistaken assumption the those development needs had to constitute “exceptional circumstances”.

Assessment of the Church Balk site against the purposes of Green Belt and the Council's Methodology

8.15 In order to determine whether it is appropriate to allocate the site to meet the development needs of the City and exclude the site from the Green Belt, it is assessed against the 5 purposes of the Green Belt:

1. To check the unrestricted sprawl of large built-up areas

8.16 The allocation of the site would assist in meeting an identified requirement for sustainable development, and enable the Council to define Green Belt boundaries that will endure beyond the Plan period. It will therefore help check the unrestricted sprawl of the larger urban area.

2. To prevent neighbouring towns merging into one another

8.17 The site does not perform an important role in preventing neighbouring town merging into one another.

3. To assist in safeguarding the countryside from encroachment

8.18 Part of the justification provided by the Council for removing this site as an allocation within the plan was that it would

“extend the existing village settlement boundary beyond Church Lane / Eastfield Lane and to the east of Church Balk and would encroach into open countryside, therefore conflicting with greenbelt purposes. The creation of defensible greenbelt boundaries would also be difficult for related reasons”

8.19 However, the subject site lies to the south of the former water tower in Dunnington, which has been converted for residential use. The building is a local landmark and the first property along Church Balk when approaching the village from the north. On the southern side of the street there is a row of dormer bungalows, which form part of a wider suburban estate. The development of these bungalows has already had the effect of shifting the settlement limit of Dunnington to the north of Eastfield Lane. This was acknowledged by officers in their previous technical assessments for housing allocation H33, which stated that:

- The allocation would keep development in line with the northern edge of the village and the permission for a cemetery in the adjacent field
- The northern entrance to the village has already been compromised slightly by development at the south end of Church Balk

8.20 We agree with officer's previous analysis that the allocation of land to the east of Church Balk will establish a consistent boundary at the northern edge of the village. The development of this area will effectively fill a gap between existing housing along Church

Balk to the west, Eastfield Lane to the south, Dunnington Cemetery and its associated expansion site to the east and the water tower to the north.

- 8.21 The boundaries of the site that are not already fully enclosed by existing housing are:
- the northern edge with the water tower, which is defined by mature hedging along with intermittent tree cover
 - The eastern edge with Dunnington cemetery, which is marked by post and wire fencing and a hedge to the south. It will become further enclosed with the approved expansion of the cemetery to the north

- 8.22 In accordance with the criteria of paragraph 85 of the NPPF, these boundaries are considered to be clear and defined by physical features that are recognisable and likely to be permanent. Therefore, we do not agree with the recent comments from officers that the creation of defensible Green Belt boundaries will be difficult for this site

4. To preserve the setting and special character of historic towns

- 8.23 It is considered that development of the land at Church Balk would have no adverse impacts in relation to the need to preserve the setting and special historic character of York or Dunnington. Previous technical officer assessment has identified that

“the site also forms part of York Moraine, which contributes to the historic character and setting of the village.”

- 8.24 To explain this point, the York Moraine is a low, curving ridge which extends from the east of York towards Sand Hutton. The subject site forms part of this ridge. There is a gradual fall from north to south although the changing topography is only perceptible when standing on the site. Travelling south along Church Balk towards the historic village core, views of the site are screened by high hedging along its western boundary.

- 8.25 There are other examples of development along the Moraine, most notably on the western side of Church Balk where the presence of a suburban housing estate on the western side of the street has already altered the northern approach to the village. This is acknowledged in the conservation appraisal for Dunnington, which explains that it has become one of the larger villages in the city, due to extensive suburban style development. This has wrapped around the historic village centre, so that much of its original setting has been lost. The appraisal does not make any reference to the York Moraine contributing to the historic character and setting of the village.

5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land

8.26 There are few areas of York in need of regeneration. Most, if not all, of the few remaining brownfield sites have planning applications pending or redevelopment proposals outstanding. In view of the scale of additional house allocation required to meet the objectively assessed housing needs of the City, significant additional housing allocations are required. In this context, the development of the site will not impact on the viability of remaining brownfield sites in the City.

8.0 AFFORDABLE HOUSING

8.1 The affordable housing issue in York is already discussed in paragraphs 5.8 to 5.10 of this statement, which quotes the findings of the Housing Needs Update (January 2019) that York is “becoming increasingly more unaffordable”. Previously, the 2017 SHMA Update had identified a net affordable housing need of 573 dwellings per annum and based on a 30% provision, the City would be required to deliver 1,910 dwellings per annum if it were to meet this need. However, the assessment does not take account of the policy on brownfield sites, where only a 20% requirement applies. There are also a number of large housing sites within the urban area that have been approved at less than 20% provision.

8.2 It is clear from the assessment in the SHMA that the Plan can only go some way towards addressing the affordable housing requirement in the city and one of the impacts of the reduced housing target is that the affordable provision will also drop as it becomes a percentage (20-30%) of a much lower figure. Yorvik Homes are experienced housebuilders and have recently delivered a number of schemes within the Yorkshire area where the affordable housing requirement is set as high as 40%. This is based on a discounted for sale model that does not meet the Council's policy for 80% social rent but is ultimately more affordable for the purchaser. The analysis at Appendix 5 has been produced by Yorvik Homes and compares the affordability of different affordable housing options. It demonstrates that the discounted sale option, as presented here, produces a lower overall monthly cost than alternative intermediate rent or shared equity properties, for a greater equity share. Yorvik Homes would be willing to offer 40% of the houses on this site for discounted market sale, which goes beyond the normal 30% provision.

9.0 CONCLUSION

9.1 This submission is made following consideration of the consultation documents for the Council's Proposed Modifications to the Local Plan. It considers that;

- the Council's calculation of housing need is significantly flawed and, as a result, the requirement for the Plan period in the Draft Plan falls nearly 7,500 units short of the more realistically assessed figure of 16,452 units.
- the Council is relying on a small number of strategic housing sites to deliver the necessary housing provision, but long lead-in times for development of these sites will likely result in a shortfall of delivery, particularly in the early years of the Plan.
- The Plan will not secure Green Belt boundaries that will endure beyond the plan period.
- The Plan fails to achieve the clear imperative for the Council to "significantly boost the supply of housing." as required by the NPPF.

9.2 The representations serve to illustrate the fundamental need for the Council to allocate additional land for residential development if the Local Plan is to meet an increased housing requirement, deliver more realistic housing yields from allocated housing sites and establish a permanent Green Belt boundary. The requirement for additional flexibility is amplified by the absence of any safeguarded land within the Draft Plan, and it is vital that these issues are addressed.

9.3 It is expected that examination of the housing requirements and housing yields for the proposed allocations will establish that additional sites must be allocated by the Council. Given the lack of viable brownfield sites in York, consideration of additional sites will necessarily have to include greenfield sites outside existing settlement limits, such as the proposed site. In this context, it is maintained that the land to the east of Church Balk should be considered for allocation as housing in the Local Plan.

8.27 The site continues to represent a suitable, available and viable housing site that would provide approximately 50 units, 40% of which would be offered as affordable housing. There are no abnormal development costs or infrastructure constraints and the site is under an options agreement with a local housebuilder, Yorvik Homes. This means that there is a realistic prospect that housing will be delivered on the site within the first five years of the plan – a point that was accepted by the Council in their decision to allocate the site in previous version of the document.

9.4 The analysis here, demonstrates that the current approach creates a significant risk that there will be a shortfall in the total number of houses to be provided across the various allocations. To avoid this scenario, the Local Plan should allocate additional land for residential development and identify safeguarded land. This will provide greater flexibility in the way that individual sites are brought forward so that they can respond to housing needs, demand and the surrounding context.

- 9.5 Crucially, without additional housing land allocations the Green Belt boundaries cannot be confirmed, as the Council would not be able to demonstrate that its boundaries will endure beyond the plan period, thus failing one of the fundamental objectives for Green Belt Policy as set out in Paragraph 83 of the NPPF. On the previous occasions that Planning Inspectors have considered the Council's Draft Development Plan for the city in 2000 and 2010, each Inspector has concluded that the Green Belt could not be confirmed due to inadequate development land being identified. This is also the case with the current plan.

Ycb1907.reps.gh
July 2019

APPENDIX I

Local Plan Publication Draft Comments Form

**10 June – 22
July 2019**

City of York Local Plan Proposed Modifications Consultation Response Form

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title	Mr	Mr
First Name	Matthew	Graeme
Last Name	Gath	Holbeck
Organisation (where relevant)	Yorvik Homes	O'Neill Associates
Representing (if applicable)		
Address – line 1		Lancaster House
Address – line 2		James Nicolson Link
Address – line 3		Clifton Moor
Address – line 4		York
Address – line 5		
Postcode		YO30 6GR
E-mail Address		
Telephone Number		01904 692313

Part B -Your Representation

(Please use a separate Part B form for each issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM3, PM4, PM5, PM20a, PM20d, PM21a, PM21d and PM22

Document:

City of York Local Plan Proposed Modifications & TP1 Addendum

Page Number:

Various

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

No comment

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

Please see attached representation

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

Please see attached representation

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

N/A

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 2018 to inform the Local Plan process. We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't. City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

Signature

Date

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspectors to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

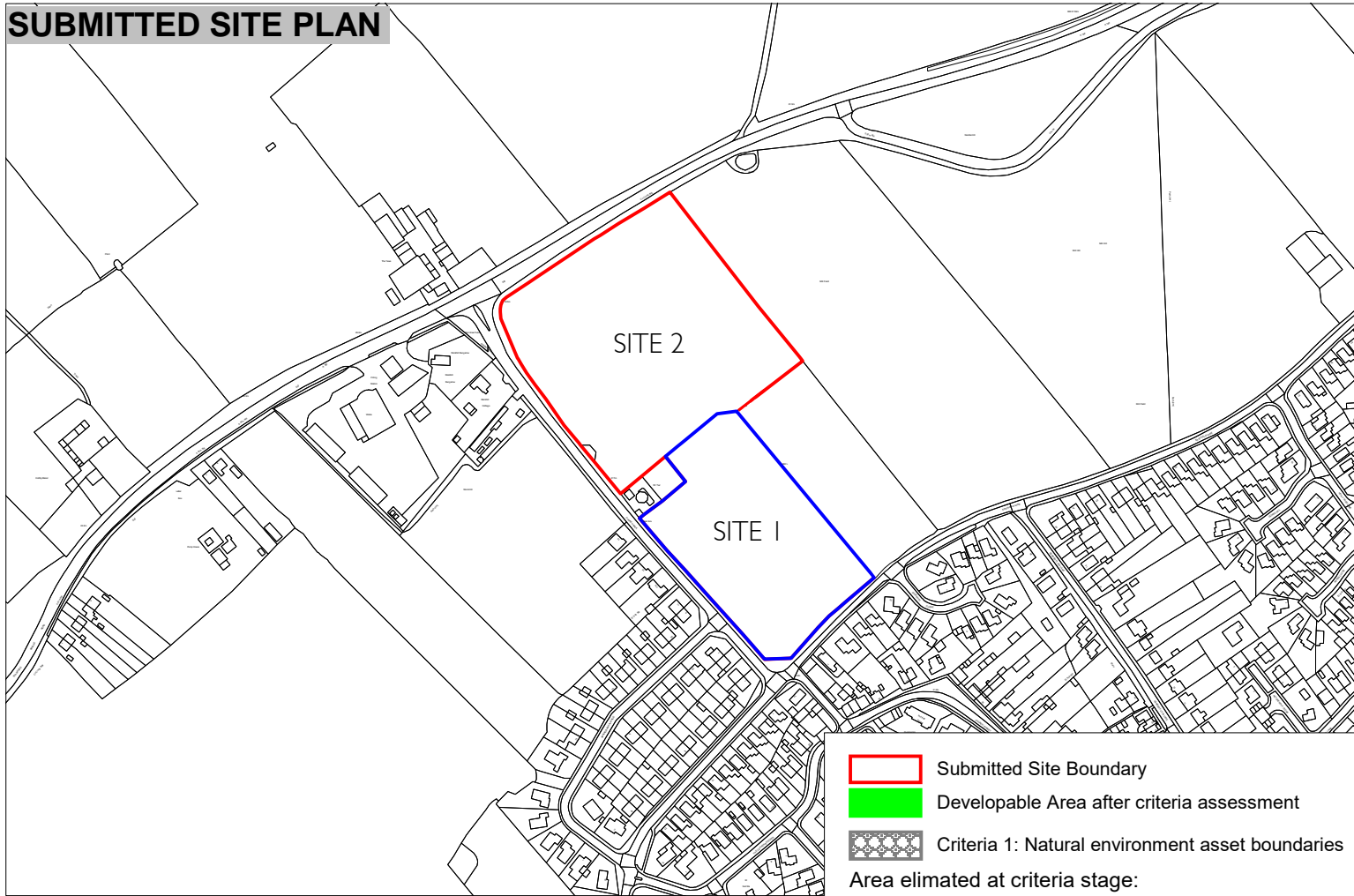
The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

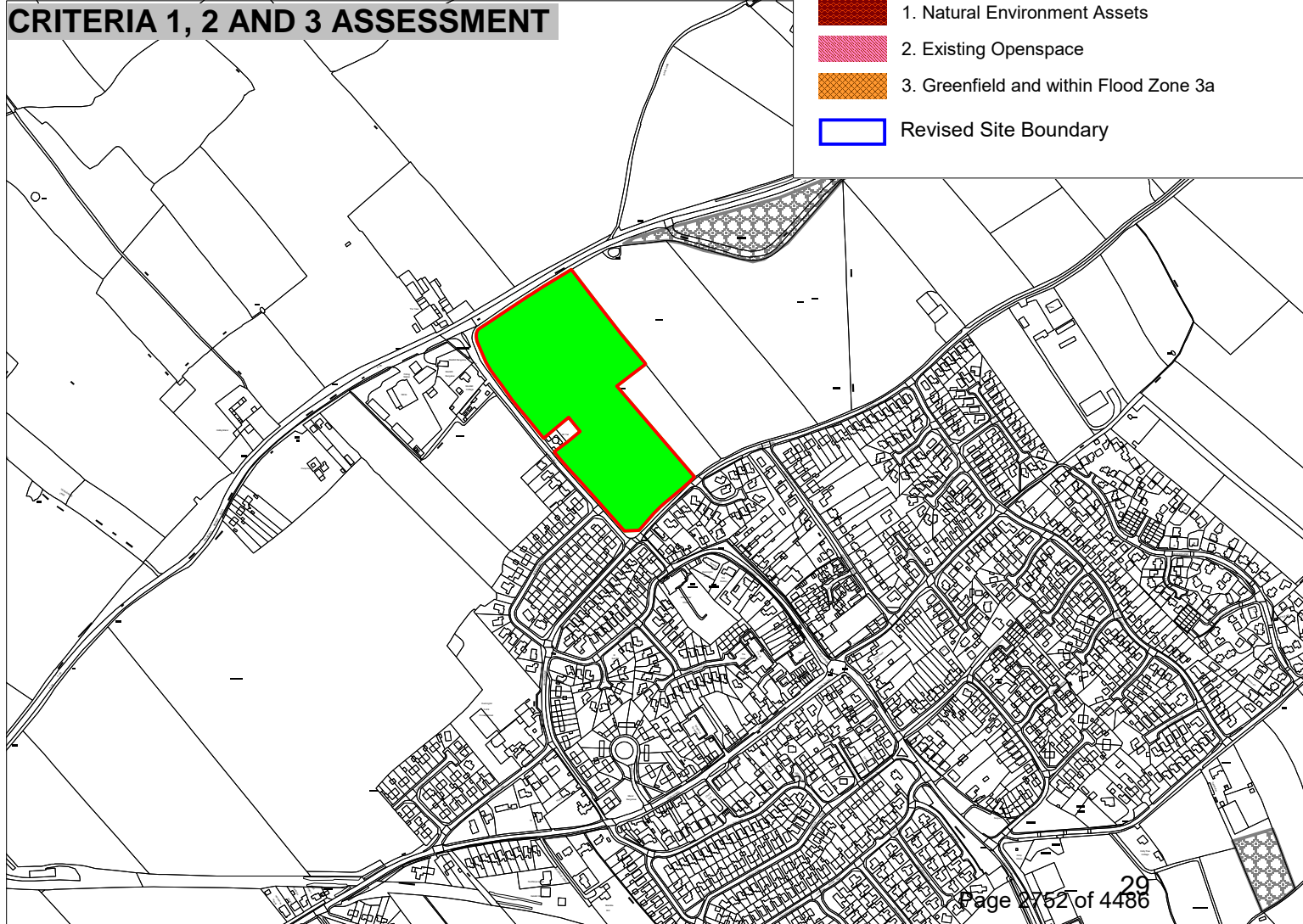
APPENDIX 2








Location Plan

SUBMITTED SITE PLAN



CRITERIA 1, 2 AND 3 ASSESSMENT



-  Submitted Site Boundary
-  Developable Area after criteria assessment
-  Criteria 1: Natural environment asset boundaries
- Area eliminated at criteria stage:
 -  1. Natural Environment Assets
 -  2. Existing Openspace
 -  3. Greenfield and within Flood Zone 3a
 -  Revised Site Boundary

APPENDIX 3

City of York List of Unimplemented Planning Permissions (as at 1 April 2018)

Ward	Parish	SITE NAME	Easting	Northing	Core Strategy Location Zone	Applic. Number	Date permission Granted	Status of Site at 31/03/2018	Expiry Date of Consent	Total Built	Total Capacity	Total Remaining	Net Total Remaining	Type of Housing	Number of Bedrooms	New/ Conv/ COU	Loss of units	GF/BF	Site size (ha)
Rural W	Upper Pop	Grange Farm Hodgson Lane Upper Poppleton	455098	453725	Rural	04/00186/FUL	20/06/2005	Under Construction	N/A	0	6	6	6	6 No town houses	2 x 2 bed, 4 x 3 bed	COU	No	GF	0.216
Dring & Wthp		Proposed New Dwelling St Edwards Close	458892	449626	Urban	17/01963/FUL	09/11/2004	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GF	0.550
Mick		All Saints Church North Street	460054	451755	City Centre	05/00048/FUL	20/03/2009	Under Construction	N/A	0	3	3	3	2 No town houses, 1 No flat	1 x 1 bed flat, 2 x 2 bed town houses	New	No	BF	0.161
Hunt & Ne	Huntington	59 The Old Village Huntington	461707	456309	Sub-Urban	05/01581/FUL	21/04/2006	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GF	0.026
Heslington	Heslington	Enclosure Farm Main Street Heslington	462858	450298	Sub-Urban	07/01046/FUL	13/08/2007	Under Construction	N/A	1	3	2	2	1 No detached house, 1 No detached Bungalow	1 x 6 bed det house, 1 x 2 bed det bung	COU	No	BF	0.223
Mick		Moat Hotel Nunnery Lane	459990	451279	Urban	08/01049/FUL	15/07/2008	Under Construction	N/A	3	4	1	1	1 No flats	1 x 2 bed	COU	No	BF	0.069
Strensall	Earswick	Store Adj to 45 The Village Earswick	461673	457200	Small Village	08/02677/FUL	24/03/2009	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	New	No	BF	0.239
Westfd		48 Wetherby Road	456732	451446	Sub-Urban	09/01338/FUL	29/10/2009	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	GDN	0.069
Fisher		4 Derwent Road	460950	449874	Urban	10/00287/FUL	14/05/2010	Under Construction	N/A	1	2	1	1	1 No Semi-detached houses	1 x 3 bed	New	Yes (demolish -1)	BF/GDN	0.050
Strensall	Earswick	4 Willow Grove Earswick	462125	457288	Small Village	10/00297/FUL	10/01/2011	Under Construction	N/A	0	2	2	1	2 No detached bungalows	1 x 3, 1 x 4 bed	New	Yes (demolish -1)	BF/GDN	0.085
Strensall	Stockton o	Stockton Lodge Sandy Lane Stockton on Forest	466396	456849	Small Village	10/00617/FUL	11/03/2013	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.035
Strensall	Stren & To	The Grange Towthorpe Road Haxby	462368	458645	Rural	10/02764/FUL	02/02/2011	Under Construction	N/A	0	1	1	1	1 No town house	1 x 3 bed	COU	No	BF	0.080
Acomb		145 Beckfield Lane	456893	452297	Sub-Urban	11/00454/FUL	27/05/2011	Under Construction	N/A	0	5	5	4	5 No Flats	5 x 1 bed	Conv	Yes -1	BF	0.079
HewW	HewW	Rowes Farm Bungalow Stockton Lane	463564	454215	Rural	11/02928/FUL	09/08/2012	Under Construction	N/A	0	2	2	2	2 No town houses	2 x 2 bed	COU	No	GF	0.100
Hunt & Ne	Huntington	Beechwood Beechwood Hoggrove	463789	455565	Rural	11/03113/FUL	26/04/2012	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 5 bed	COU	No	GF	0.093
Strensall	Stockton o	Methodist Chapel The Village Stockton on Forest	465557	455953	Small Village	12/00241/FUL	23/04/2012	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 7 bed	New	No	BF	0.076
Strensall	Stockton o	Chapel Farm 111 The Village Stockton on Forest	465801	456231	Small Village	12/01216/FUL	02/07/2012	Under Construction	N/A	0	1	1	1	1 No town house	1 x 3 bed	COU	No	GF	0.055
Mick		JW Frame (Plumbers) Ltd 9a Smales Street	460068	451439	City Centre	13/00271/FUL	19/04/2013	Under Construction	N/A	0	1	1	1	1 No town house	1 x 2 bed	COU	No	BF	0.006
Hew		66 Heworth Green	461382	452646	Urban	13/00957/FUL	09/07/2013	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.030
Derst	Dunnington	25 Garden Flats Lane Dunnington	467025	452826	Village	16/00337/REM	10/10/2016	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 4 bed	New	No	GDN	0.134
Guilth		Mack & Lawler Builders Ltd 2a Low Ousegate	460245	451881	City Centre	16/02710/ORC	06/03/2017	Not yet started	06/03/2022	0	8	8	8	8 No flats	8 x 2 bed	COU	No	BF	0.022
Strensall	Stockton o	Stockton Lodge Sandy Lane Stockton on Forest	466396	456849	Small Village	13/02626/FUL	17/10/2013	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 5 bed	New	No	GDN	0.039
Acomb		1A Danebury Crescent	457092	451686	Sub-Urban	13/02665/FUL	26/11/2013	Under Construction	N/A	0	2	2	2	2 No detached bungalows	2 x 2 bed	New	No	GDN	0.111
Strensall	Stockton o	Church Farm 84 The Village Stockton on Forest	465681	456066	Small Village	13/02755/FUL	28/03/2014	Under Construction	N/A	1	2	1	1	1 No detached houses	1 x 3 bed	New	No	GF	0.320
Hew		2a Mill Lane	461249	452623	Urban	13/03153/FUL	18/11/2013	Under Construction	N/A	0	3	3	3	3 No flats	1 x 1 & 2 x 2 bed	New	No	BF	0.024
Bishopthor	Bishopthor	Manor Farm Bishopthorpe Road	460029	449213	Rural	13/03403/FUL	05/02/2014	Under Construction	N/A	0	1	1	1	1 No town house	1 x 4 bed	COU	No	GF	0.010
Guilth		Bronze Dragon 51 Huntington Road	460908	452879	Urban	13/03573/FUL	17/01/2014	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 1 bed	New	No	BF	0.015
Mick		English Martyrs Church Hall Dalton Terrace	459313	451127	City Centre	13/03595/FUL	15/05/2014	Under Construction	N/A	0	4	4	4	4 No flats	1 x 1 & 3 x 3 bed	New	No	BF	0.027
Clifton		Bert Keech Bowling Club Sycamore Place	459653	452395	Urban	13/03727/FUL	07/01/2016	Not yet started	07/01/2019	0	5	5	5	4 No town houses, 1 No detached house	4 x 5 bed town houses, 1 x 6 bed detached house	New	No	GF	0.222
HewW	HewW	OED Books 1 Straylands Grove	461832	453509	Urban	14/00098/FUL	12/03/2014	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	GDN	0.070
Rural W	Copmantho	105 Temple Lane Copmanthorpe	457748	446020	Rural	14/00099/FUL	22/10/2014	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 3 bed	Conv	No	BF	0.170
Strensall	Stren & To	Middleton House 2 Redmayne Square Strensall	463784	461237	Large Village	17/00308/FUL	05/04/2017	Not yet started	05/04/2020	0	1	1	1	1 No detached house	1 x 5 bed	New	No	GDN	0.090
Acomb		1 Wetherby Road	456990	451497	Sub-Urban	14/00511/REM	10/06/2014	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	GDN	0.060
Fulford	Fulford	Raddon House 4 Fenwicks Lane	460846	449312	Sub-Urban	14/00613/FUL	26/11/14	Under Construction	N/A	0	1	1	0	1 No detached house	1 x 5 bed	New	yes (demolish -1)	BF	0.940
Rural W	Upper Pop	37 Station Road Upper Poppleton	455892	453757	Large Village	14/00929/FUL	26/08/2014	Under Construction	N/A	0	1	1	0	1 No detached house	1 x 4 bed	New	Yes (demolish -1)	BF	0.100
Bishopthor	Copmantho	Mar-Stan Temple Lane Copmanthorpe	458081	445880	Rural	17/00248/FUL	19/04/2017	Not yet started	19/04/2020	0	1	1	0	1 No detached bungalow	1 x 3 bed	New	yes (demolish -1)	BF	0.170
Skelt/Rawl	Skelton	Del Monte Skelton Park Trading Estate Skelton	456799	455860	Village	14/01478/OUTM	09/03/2016	Not yet started	09/03/2019	0	60	60	60	Not yet confirmed	Not yet confirmed	New	No	BF	2.290

	Westfld		G1 Newbury Avenue	457830	450303	Urban	14/01517/GR/G3	08/10/2014	Not yet started	08/10/2017	0	9	9	9	9 No flats	1 x 1, 8 x 2 bed	New	No	BF	0.282
	Derwt	Holtby	Piker Thorn Farm Bad Bargain Lane	465016	454232	Rural	14/01761/FUL	16/09/2014	Under Construction	N/A	0	1	1	0	1 no detached bungalow	1 x 2 bed	New	Yes (demolish -1)	GDN	0.026
	Fisher		1-12 Kensal Rise	460937	450731	Urban	14/01857/FUL	09/01/2015	Not yet started	09/01/2018	0	6	6	6	6 No flats	2 x 1, 4 x 2 bed	Conv	No	BF	0.150
	Hax & Wig	Haxby	The Memorial Hall 16 The Village Haxby	460834	458229	Large Village	14/01982/FUL	09/01/2015	Under Construction	N/A	0	3	3	3	3 No town houses	3 x 2 bed	New	No	BF	0.050
	Raw & Cliff	Rawcliffe	North Lodge Clifton Park Avenue	458481	453848	Sub-Urban	16/01173/FULM	02/12/2016	Under Construction	N/A	0	14	14	14	14 No flats	2 x 1, 12 x 2 bed	New	No	BF	0.127
	Guilhl		1 Paver Lane	460893	451554	City Centre	17/01637/FUL	15/09/2017	Under Construction	N/A	0	2	2	2	2 No town houses	1 x 1, 1 x 2 bed	COU	No	BF	0.020
	Dring & Wthp		306 Tadcaster Road	458910	450128	Urban	14/02074/FUL	15/09/2016	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 2 bed	Conv	No	BF	0.040
	Wheldrake	Wheldrake	Wheldrake Hall Farm 6 Church Lane Wheldrake	468350	444879	Rural	17/00636/ABC	15/05/2017	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	COU	No	GF	0.040
	Bishopthor	Bishopthor	Site of Ferry Cottage 6 Ferry lane Bishopthorpe	459846	447665	Rural	17/02304/FUL	06/02/2018	Not yet started	06/02/2021	0	1	1	0	1 No detached house	1 x 3 bed	New	yes (demolish -1)	BF	0.214
	Rural W	Nether Pock	Barn South of Greystones Church Lane Nether Poptleton	456327	454999	Large Village	14/02531/FUL	08/01/2015	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	Conv	No	BF	0.380
	Mick		Villa Italia 69 Micklegate	459918	451604	City Centre	14/02546/FUL	13/11/2015	Under Construction	N/A	0	4	4	4	3 No flats, 1 No detached house	2 x 1, 1 x 2 bed flats, 1 x 2 bed detached house	COU/New	No	BF	0.020
	Bishopthor	Bishopthor	Manor Farm Bishopthorpe Road	460029	449213	Rural	14/02859/ABC3	05/02/2015	Under Construction	N/A	0	1	1	1	1 No town house	1 x 3 bed	COU	No	GF	0.010
	Strensall	Earswick	OS Field 2424 Wisker Lane Earswick	463262	457225	Rural	15/00060/ABC3	04/03/2015	Not yet started	04/03/2020	0	3	3	3	3 No town houses	3 x 2 bed	COU	No	GF	0.100
	Holgate		Gateway 2 Holgate Park Drive	458515	451715	City Centre Ext 1	15/00150/ORC	17/03/2015	Not yet started	17/03/2020	0	0	0	0	TBA	TBA	COU	No	BF	0.272
	Westfld		Co-op 47 York Road Acomb	457658	451434	Urban	15/00238/FUL	02/07/2015	Under Construction	N/A	0	1	1	1	1 No flat	1 x 1 bed	COU	No	BF	0.013
	Heworth		First Floor Flat 126 Haxby Road	460604	453218	Urban	15/00254/FUL	07/04/2015	Under Construction	N/A	0	1	1	1	1 No flat	1 x 2 bed	COU	No	BF	0.015
	Strensall	Stren & Tor	Middleton House 2 Redmayne Square Strensall	463779	461250	Large Village	15/00362/FUL	29/05/2015	Not yet started	29/05/2018	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.040
	Holgate		Direct Workwear 158 Poptleton Road	458152	452144	Urban	15/00385/FUL	23/04/2015	Not yet started	23/04/2018	0	1	1	1	1 No flat	1 x 1 bed	COU	No	BF	0.006
	Hax & Wig	Wigginton	OS Field 0005 Sutton Road Wigginton	459033	460295	Rural	15/00449/FUL	14/05/2015	Under Construction	N/A	0	1	1	0	1 No detached bungalow	1 x 3 bed	New	Yes (demolish -1)	BF	0.070
	Holg		Orchard House 8 Hamilton Drive East	458913	451166	Urban	15/00561/FUL	28/05/2015	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 2 bed	New	No	GDN	0.087
	Wheldrake	Elvington	The Barn Dauby Lane Elvington	469492	448599	Rural	15/00638/ABC3	19/05/2015	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 3 bed	COU	No	GF	0.010
	Fisher		Friars Rest Guest House 81 Fulford Road	460840	450812	Urban	15/00677/FUL	17/06/2015	Not yet started	17/06/2018	0	1	1	1	1 No town house	1 x 5+ bed	COU	No	BF	0.020
	Skelt/Raw	Rawcliffe	11A Rosecroft Way	458395	453912	Sub-Urban	15/00708/FUL	16/09/2015	Not yet started	16/09/2018	0	1	1	1	1 No town house	1 x 3 bed	New	No	GDN	0.069
	Dring & Wthp		257 Thanet Road	457888	450042	Urban	15/00709/FUL	29/05/2015	Not yet started	29/05/2018	0	1	1	1	1 No detached Bungalow	1 x 3 bed	New	No	GDN	0.016
	Rural W	Askham Bryan	107 Main Street Askham Bryan	455114	448357	Small Village	15/00889/FUL	24/06/2015	Under Construction	N/A	0	1	1	0	1 No detached house	1 x 4 bed	New	Yes (demolish -1)	BF	0.100
	Wheldrake	Naburn	Pear Tree Cottage	459857	445562	Small Village	15/01037/FUL	22/10/2015	Under Construction	N/A	0	1	1	0	1 No detached house	1 x 4 bed	New	Yes -1	BF	0.077
	Mick		7 Charlton Street	460204	450903	Urban	15/01083/FUL	28/07/2015	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 1 bed	New	No	GDN	0.010
	Strensall	Earswick	6 Willow Grove Earswick	462140	457288	Small Village	15/01152/FUL	10/12/2015	Not yet started	10/12/2018	0	2	2	1	2 No detached bungalows	2 x 3 bed	New	Yes	GDN	0.126
	Guilhl		68 Bootham	459810	452422	City Centre	15/01157/FUL	16/10/2015	Not yet started	16/10/2018	0	1	1	1	1 No detached house	1 x 3 bed	New	No	BF	0.040
	Mick		4 Scarcroft Lane	459825	451211	Urban	17/01722/FUL	22/09/2017	Not yet started	22/09/2020	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.012
	Heworth		York House 62 Heworth Green	461328	452681	Urban	15/01196/FUL	10/08/2015	Not yet started	10/08/2018	0	3	3	2	3 No flats	1 x 2, 2 x 3 bed	COU/Conv	Yes -1	BF	0.076
	Acomb		Site to R/O 1-9 Beckfield Lane	456912	451585	Sub-Urban	16/02269/FULM	18/10/2017 Won on appeal	Under Construction	N/A	0	11	11	11	2 No semi-detached houses, 6 No town houses, 2 No semi-detached bungalows, 1 No detached bungalow	2 x 3 bed semi-detached houses, 6 x 3 bed town houses, 2 x 3 bed semi-detached bungalows, 1 x 3 bed detached bungalow	New	No	GDN	0.270
	Heworth		Former Londons 31a Hawthorne Grove	461290	452513	Urban	17/00088/FULM	31/07/2017	Under Construction	N/A	0	10	10	10	10 No flats	8 x 1, 2 x 2 bed	COU	No	BF	0.070
	Wheldrake	Elvington	Oak Trees Elvington Lane Elvington	468469	448239	Rural	17/01376/REM	16/08/2017	Not yet started	16/08/2019	0	1	1	1	1 No detached bungalow	1 x 4 bed	New	No	BF	0.780
	Hunt & New	New Earswick	Land to North and West of 41 & 43 Park Avenue New Earswick	460636	456038	Sub-Urban	15/01390/FUL	11/02/2016	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GF	0.115
	Hax & Wig	Haxby	Vacant Land South of 39 Sandringham Close Haxby	460281	457055	Large Village	17/00614/FUL	16/06/2017	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	GF	0.043
	Hax & Wig	Wigginton	Wigginton Grange Farm Corban Lane Wigginton	458978	458765	Rural	15/01441/FUL	07/09/2015	Under Construction	N/A	0	1	1	0	1 No detached house	1 x 6 bed	New	Yes (demolish -1)	BF	0.013
	Strensall	Stockton on Forest	Church Farm 84 The Village Stockton on Forest	465681	456066	Small Village	15/01446/FUL	25/02/2016	Under Construction	N/A	0	3	3	3	3 No detached houses	1 x 3, 2 x 4 bed	New	No	GF	0.170
	Guilhl		6 Peckitt Street	460362	451464	City Centre	15/01447/FUL	14/09/2015	Not yet started	14/09/2018	0	1	1	1	1 No town house	1 x 4 bed	COU	No	BF	0.010

	Guilhl		Barry Crux 20 Castlegate	460414	451605	City Centre	15/01522/FUL	22/01/2016	Not yet started	20/01/2019	0	2	2	2	2	2	2 No flats	1 x 1, 1 x 2 bed	COU	No	BF	0.023
	Westfild		Beau & Joli Ltd 1st & 2nd Floors 43 York Road Acomb	457670	451437	Urban	15/01578/RFP/PR	10/09/2015	Not yet started	10/09/2020	0	1	1	1	1	1	1 No flat	1 x 2 bed	COU	No	BF	0.018
	Hax & Wia	Haxby	14 The Avenue Haxby	461016	457701	Large Village	15/01598/FUL	06/11/2015	Not yet started	06/11/2018	0	1	1	1	1	1	1 No detached house	1 x 2 bed	New	No	GDN	0.026
	Guilhl		Site to Rear of 22a Huntington Road	460940	452668	Urban	15/01752/FUL	02/10/2015	Not yet started	02/10/2018	0	2	2	2	2	2	2 No semi-detached houses	2 x 2 bed	New	No	BF	0.020
	Rural W	Rufforth &	Land to East of Orchard Vale Wetherby Road Rufforth	452908	451529	Small Village	15/01808/FUL	11/12/2015	Not yet started	11/12/2018	0	1	1	1	1	1	1 No detached house	1 x 5 bed	New	No	GF	0.085
	Copmanthf	Copmanthf	Station Cottages Station Road Copmanthorpe	456668	446507	Village	15/01886/FUL	18/05/2016	Not yet started	18/05/2019	0	1	1	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	GDN	0.050
	Strensal	Stren & To	42 Middlecroft Drive Strensal	462878	460386	Large Village	15/01895/FUL	08/03/2016	Not yet started	08/03/2019	0	1	1	1	1	1	1 No semi-detached house	1 x 2 bed	New	No	GDN	0.012
	Guilhl		Fire Station 18 Clifford Street	460360	451493	City Centre	15/02155/FUL/M	02/09/2016	Under Construction	N/A	0	14	14	14	14	14	7 No town houses, 7 No flats	5 x 2, 2 x 3 bed flats, 7 x 4 bed town houses	New	No	BF	0.140
	Mick		Car Parking Area Holgate Road	459499	451253	City Centre	15/02295/FUL	01/03/2016	Not yet started	01/03/2019	0	6	6	6	6	6	6 No flats	6 x 1 bed	New	No	BF	0.032
	Fulford & H	Heslington	24 Main Street Heslington	462856	450204	Sub-Urban	15/02532/FUL	23/05/2016	Under Construction	N/A	0	1	1	-1	-1	-1	1 No town house	1 x 6 bed	Conv	Yes -1	BF	0.057
	Clifton		St Marys Hotel 16-17 Longfield Terrace	459633	452211	Urban	15/02544/FUL	05/01/2016	Not yet started	05/01/2019	0	2	2	2	2	2	2 No town houses	1 x 3, 1 x 4 bed	COU	No	BF	0.025
	Mick		5 Cherry Hill Lane	460279	451139	Urban	15/02576/FUL	23/03/2016	Not yet started	23/03/2019	0	2	2	2	1	1	2 No semi-detached bungalows	2 x 1 bed	Conv	Yes -1	BF	0.019
	Hunt & Nel	Huntington	2 Meadow Way Huntington	461903	455735	Sub-Urban	15/02617/FUL	16/02/2016	Not yet started	16/02/2019	0	1	1	1	1	1	1 No detached bungalow	1 x 2 bed	New	No	GDN	0.025
	Heworth	Without	206 Stockton Lane	462421	453266	Sub-Urban	15/02624/FUL	11/03/2016	Not yet started	11/03/2019	0	4	4	4	4	4	3 No detached houses, 1 No detached bungalow	all 4 bed properties	New	No	GDN	0.190
	Osbaldwk	Osbaldwk	15 Murton Way	463657	451931	Sub-Urban	15/02650/FUL	20/05/2016	Not yet started	20/05/2019	0	1	1	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.070
	Fisher		Melbourne Hotel 6 Cemetery Road	460935	450963	Urban	15/02739/FUL	01/04/2016	Under Construction	N/A	0	6	6	6	6	6	4 No flats, 2 No town houses	1 x 1 & 3 x 2 bed flats, 2 x 3 bed town houses	COU/New	No	BF	0.036
	Guilhl		Macdonalds 19-22 Fossgate	460567	451766	City Centre	15/02760/FUL	05/02/2016	Under Construction	N/A	0	5	5	5	5	5	1 No flat, 4 No town houses	1 x 1 bed flat, 1 x 2 & 3 x 3 bed town houses	COU	No	BF	0.116
	Guilhl		Coin Hicks Motors Garage & Yard to R/O 33 Bootham	460061	452367	City Centre	17/01546/FUL	23/01/2018	Not yet started	23/01/2021	0	14	14	14	14	14	14 No flats	13 x 1, 1 x 2 bed	New	No	BF	0.050
	Os & Den	Dunnington	8 Petercroft Lane Dunnington	467161	452737	Village	15/02813/FUL	06/05/2016	Not yet started	06/05/2019	0	1	1	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.031
	Acomb		4 Jorvik Close	457082	452286	Sub-Urban	15/02825/FUL	16/06/2016	Under Construction	N/A	0	1	1	1	1	1	1 No town house	1 x 3 bed	New	No	GDN	0.017
	Strensal	Earswick	Fossbank Boarding Kennels Strensal Road	461850	457772	Rural	16/02792/OUT	07/02/2017	Not yet started	07/02/2020	0	4	4	4	4	4	4 no detached houses	2 x 3, 2 x 5 bed	New	No	BF	0.320
	Heworth		Wall to Wall Ltd 71 East Parade	461494	452574	Urban	15/02878/FUL	02/03/2016	Not yet started	02/03/2019	0	1	1	1	1	1	1 No detached bungalow	1 x 2 bed	COU	No	BF	0.016
	Raw & Cliff	Rawcliffe	Site to Side of 2 Holyrod Drive fronting onto Manor Lane	457981	455023	Sub-Urban	16/02230/FUL	1/2017 Won on a	Under Construction	N/A	0	4	4	4	4	4	4 No semi-detached houses	4 x 3 bed	New	No	GF	0.084
	Mick		Hudson House Toft Green	459759	451619	City Centre	17/00576/FUL/M	23/08/2017	Under Construction	N/A	0	127	127	127	127	127	127 No Flats	49 x 1, 73 x 3.5 x 3 bed	New	No	BF	0.550
	Mick		23 Nunnery Lane	459930	451281	Urban	16/00123/FUL	23/03/2016	Under Construction	N/A	0	1	1	1	1	1	1 No flat	1 x 2 bed	COU	No	BF	0.009
	Mick		14 Priory Street	459883	451464	City Centre	16/00261/FUL	17/05/2016	Under Construction	N/A	0	2	2	2	1	1	2 no flats	1 x 2, 1 x 3 bed	Conv	Yes -1	BF	0.011
	Guilhl		Marygate Orthodontic Practice 64 Marygate	459784	452144	City Centre	16/00500/FUL	03/05/2016	Not yet started	03/05/2019	0	1	1	1	1	1	1 No town house	1 x 4 bed	COU	No	BF	0.016
	Strensal	Stockton o	Carlton Cottage Old Carlton Farm Common Lane Warthill	467176	456592	Rural	16/02604/FUL	04/01/2017	Under Construction	N/A	0	1	1	1	1	1	1 No detached house	1 x 2 bed	Conv	No	BF	0.070
	Guilhl		36 Clarence Street	460295	452670	Urban	16/00799/FUL	16/06/2016	Under Construction	N/A	0	4	4	4	4	4	4 No flats	4 x 1 bed	New	No	GDN	0.011
	Mick		Newington Hotel 147 Mount Vale	459252	450772	Urban	16/00833/FUL	14/06/2016	Under Construction	N/A	0	7	7	7	7	7	7 No town houses	2 x 2, 1 x 3, 2 x 4, 2 x 5 bed	COU/New	No	BF	0.204
	Dring & Withp		Land Between 8 & 12 White House Gardens	459039	450518	Urban	16/00870/FUL	08/07/2016	Not yet started	08/07/2019	0	1	1	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.045
	Osbaldwk	Kexby	Woodhouse Farm Dauby Lane Kexby	468905	449631	Rural	16/02558/FUL	16/01/2017	Under Construction	N/A	0	1	1	1	1	1	1 No semi-detached bungalow	1 x 3 bed	Conv	No	BF	0.086
	Hull Rd		47 Osbaldwick lane	462663	451621	Urban	16/00988/FUL	29/07/2016	Not yet started	29/07/2019	0	1	1	1	1	1	1 No town house	1 x 2 bed	New	No	GDN	0.015
	Mick		2 Custance Walk	459982	451232	Urban	16/01011/FUL	19/09/2016	Under Construction	19/06/2016	19/09/2019	0	4	4	4	2	4 No flats	4 x 1 bed	Conv	Yes -2	BF	0.020
	Westfild		Mustgetgear Ltd 43 Front Street Acomb	457306	451280	Sub-Urban	16/01014/FUL	21/06/2016	Not yet started	21/06/2019	0	2	2	2	2	2	2 No flats	2 x 1 bed	New	No	BF	0.016
	Guilhl		Stonebow House The Stonebow	460548	451853	City Centre	16/01003/FUL	10/10/2016	Under Construction	N/A	0	5	5	5	5	5	5 No flats	1 x 1, 4 x 3 bed	COU	No	BF	0.173
	Guilhl		Stonebow House The Stonebow	460548	451853	City Centre	16/01018/ORC	17/06/2016	Under Construction	N/A	0	15	15	15	15	15	15 No flats (indicative)	5 x 1, 7 x 2, 3 x 3 bed (indicative)	COU	No	BF	0.173
	Heworth W	HewW	306 Stockton Lane	462930	453578	Sub-Urban	16/01154/FUL	26/09/2016	Not yet started	N/A	0	1	1	1	1	1	1 no detached bungalow	1 x 2 bed	New	No	GDN	0.025
	Guilhl		Crook Lodge 26 St Marys	459732	452301	City Centre	16/01177/FUL	30/06/2016	Not yet started	30/06/2019	0	1	1	1	1	1	1 No town house	1 x 7 bed	COU	No	BF	0.028
	Copmanthf	Copmanthf	134 Temple Lane Copmanthorpe	457935	445895	Rural	16/01185/FUL	08/07/2016	Under Construction	N/A	0	2	2	2	2	2	2 No semi-detached houses	2 x 1 bed	Conv	No	BF	0.100

	Fisher		Flat 1 8 Wenlock Terrace	460788	450439	Urban	16/01188/FUL	05/07/2016	Not yet started	05/07/2019	0	9	9	4	9 No flats	9 x 1 bed	Conv	Yes -5	BF	0.020
	Strensall	Stren & To	The Firs Lords Moor Lane Strensall	463846	460870	Large Village	16/01239/REM	20/07/2016	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.117
	Guilhl		Herbert Todd & Son Percys Lane	460925	451611	City Centre	16/01263/FULM	26/08/2016	Under Construction	N/A	0	38	38	38	26 No Flats 12 No Town Houses	20 x 1, 6 x 3 bed flats, 4 x 5, 8 x 6 bed town houses	New	No	BF	0.160
	Rural W	Rufforth &	Rufforth Aerodrome Bradley Lane Rufforth	453699	450614	Rural	16/01303/REM	02/08/2016	Not yet started	20/05/2019	0	1	1	1	1 No detached house	1 x 4 bed *not yet confirmed	New	No	GF	0.010
	Acomb		23 The Green Acomb	457158	451396	Sub-Urban	16/01306/FUL	03/08/2016	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.050
	Wheldrake	Deighton	Ackroyds Restaurant Meats Deighton	462444	445659	Rural	16/01318/FUL	12/08/2016	Not yet started	12/08/2019	0	1	1	1	1 No detached house	1 x 5 bed	COU	No	BF	0.150
	Wheldrake	Wheldrake	Garth Cottage 8 Church Lane Wheldrake	468373	444973	Small Village	16/01353/FUL	01/09/2016	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.019
	Guilhl		Unides Systems Ltd Manor Chambers 26a marygate	459900	452257	City Centre	16/01428/ORC	23/09/2016	Not yet started	23/09/2021	0	3	3	3	3 No flats	3 x 2 bed	COU	No	BF	0.037
	Heworth		140 Fourth Avenue	462132	452243	Urban	16/01459/FUL	17/08/2016	Not yet started	17/08/2019	0	1	1	1	1 no town house	1 x 3 bed	New	No	GDN	0.027
	Guilhl		Garage Court Agar Street	460799	452375	City Centre	16/01469/FUL	10/08/2016	Under Construction	N/A	0	3	3	3	3 No town houses	3 x 2 bed	New	No	BF	0.074
	Westfld		Acomb Jewellers 10 Acomb Court Front Street	457516	451411	Sub-Urban	16/01497/FUL	24/08/2016	Not yet started	24/08/2019	0	1	1	1	1 No flat	1 x 1 bed	COU	No	BF	0.003
	HewW	HewW	440 Malton Road	463554	454909	Rural	16/01622/FUL	21/09/2016	Not yet started	21/09/2019	0	1	1	0	1 No detached House	1 x 4 bed	New	Yes (demolish -1)	BF	0.115
	Heworth		People Energies Ltd 106 Heworth Green	461517	452748	Urban	16/01625/ORC	16/09/2016	Not yet started	16/09/2021	0	1	1	1	1 No semi-detached house	1 x 4 bed	COU	No	BF	0.068
	Dring & Wthp		2 Farmlands Road	457795	449720	Sub-Urban	16/01719/FUL	13/09/2016	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.024
	Dring & Wthp		13 Highmoor Road	457742	449878	Sub-Urban	16/01265/FUL	02/11/2016	Under Construction	N/A	0	1	1	1	1 No Detached house	1 x 3 bed	New	No	GDN	0.020
	Copmanthorpe	Copmanthorpe	Land to R/O 9-11 Tadcaster Road Copmanthorpe	458904	447499	Village	16/01673/FUL	04/11/2016	Under Construction	N/A	0	4	4	4	4 no detached houses	2 x 4, 2 x 5 bed	New	No	GDN	0.370
	Mick		211 Bishopthorpe Road	460041	450149	Sub-Urban	15/00820/FUL	15/11/2016	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.017
	Westfld		36 Danesfort Avenue	457551	450662	Sub-Urban	16/01496/FUL	15/11/2016	Under Construction	N/A	0	1	1	1	1 No town house	1 x 2 bed	New	No	GDN	0.014
	Bishopthorpe	Bishopthorpe	3 Beech Avenue Bishopthorpe	459213	447343	Village	17/00817/FUL	01/06/2017	Not yet started	01/06/2020	0	2	2	1	2 No semi-detached houses	2 x 2 bed	New	Yes (demolish -1)	GDN/	0.043
	Rural W	Upper Pop	Crossfields Main Street Upper Poppleton	455611	454584	Large Village	16/01181/FUL	02/06/2017	Under Construction	N/A	0	3	3	2	3 No detached houses	2 x 5, 1 x 6 bed	New	Yes (demolish -1)	GDN/	0.154
	Clifton		12 Water End	459197	452993	Urban	15/00405/FUL	02/12/2016	Not yet started	02/12/2019	0	1	1	1	1 No detached bungalow	1 x 2 bed	New	No	GDN	0.060
	Guilhl		26-30 Swingate	460384	451954	City Centre	16/01532/FUL	07/10/2016	Not yet started	07/10/2019	0	8	8	8	8 No flats	3 x 1, 5 x 2 bed	COU	No	BF	0.058
	Holgate		128 Acomb Road	458099	451433	Urban	16/00680/FUL	04/11/2016	Under Construction	N/A	0	10	10	10	10 No flats	6 x 1, 4 x 2 bed	COU/S	No	BF	0.042
	Guilhl		51 Huntington Road	460923	452849	Urban	16/01835/FUL	04/11/2016	Not yet started	04/11/2019	0	1	1	1	1 No town house	1 x 3 bed	New	No	BF	0.018
	Rural W	Askham B	Brackenhill Askham Bryan Lane Askham Bryan	456117	449308	Rural	18/00061/FUL	28/03/2018	Not yet started	28/03/2021	0	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	BF	0.140
	Guilhl		Ryedale House 58-60 Piccadilly	460639	451481	City Centre	18/00103/ORC	15/03/2018	Not yet started	15/03/2023	0	79	79	79	79 No flats	12 x 1, 51 x 2, 16 x 3 bed	COU	No	BF	0.240
	Strensall	Stockton on	Sandburn Farm Malton Road Stockton on Forest	466473	459174	Rural	16/02305/ABC3	15/12/2016	Not yet started	16/12/2021	0	2	2	2	2 No detached houses	1 x 3, 1 x 5 bed	COU	No	GF	0.140
	Rural W	Hessay	Glebe farm Hessay to Moor Bridge Hessay	451559	453294	Rural	16/02202/FUL	28/11/2016	Not yet started	28/11/2019	0	2	2	2	2 No semi-detached houses	2 x 3 bed	New	No	GF	0.120
	Rural W	Upper Pop	Dutton Farm Boroughbridge Road	453611	453981	Rural	17/00501/FUL	1/2017 Won on a	Not yet started	20/11/2020	0	1	1	1	1 No detached house	1 x 5 bed	New	No	GF	0.900
	Osbaldwicl	Dunnington	The Bams Manor Farm Elvington Lane Dunnington	465308	451422	Rural	17/01478/FUL	16/08/2017	Under Construction	N/A	1	3	2	2	2 No town houses	2 x 4 bed	COU	No	GF	0.150
	Hunt & New Earsw	New Earsw	Land to South of 41 Park Avenue New Earswick	460655	456028	Sub-Urban	17/00200/FUL	25/07/2017	Not yet started	25/07/2020	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GF	0.049
	Guilhl		Santader 19 Market Street	460340	451795	City Centre	16/01940/FUL	01/12/2016	Not yet started	01/12/2019	0	1	1	1	1 No flat	1 x 2 bed	COU	No	BF	0.013
	Guilhl		Rowntree Wharf Navigation Road	460835	451729	City Centre	17/01888/FUL	06/12/2016	Under Construction	N/A	28	39	11	11	11 No flats	11 x 1 bed	COU	No	BF	0.475
	Guilhl		Rowntree Wharf Navigation Road	460835	451729	City Centre	17/01905/FULM	04/12/2017	Under Construction	N/A	0	14	14	14	14 No flats	14 x 1 bed	COU	No	BF	
	Guilhl		Granville House 21 Granville Terrace	461386	451468	City Centre Ext2	16/02152/FUL	01/12/2016	Under Construction	N/A	0	3	3	3	3 No flats	2 x 1, 1 x 2 bed flats	Conv	No	BF	0.015
	Guilhl		The Art Shack 4-6 Gillgate	460126	452280	City Centre	15/02517/FUL	08/12/2016	Not yet started	08/12/2019	0	4	4	3	4 No flats	2 x 1, 2 x 2 bed	COU/Conv	Yes -1	BF	0.037
	Hax & Wicg	Haxby	107 York Road Haxby	460841	457472	Large Village	16/01374/FUL	06/01/2017	Under Construction	N/A	0	1	1	0	1 No detached house	1 x 3 bed	New	Yes (demolish -1)	BF	0.100
	Fulford & H	Fulford	Fishergate County Garage 14 Heslington Lane	460996	449432	Sub-Urban	16/02665/FUL	16/01/2017	Under Construction	N/A	0	1	1	1	1 No town house	1 x 4 bed	COU	No	BF	0.022
	Wheldrake	Deighton	Springwell Main Street Deighton	462665	444348	Small Village	16/02831/FUL	03/03/2017	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	GDN	0.075
	Strensall	Earswick	Land Between 121 and 125 Strensall Road	462005	457068	Small Village	15/02950/FUL	06/03/2017	Not yet started	06/03/2020	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.028

Hunt & Nel	New Earsw	39 Park Avenue New Earswick	460678	456048	Sub-Urban	16/01871/FUL	07/03/2017	Under Construction	N/A	0	1	1	1	1	1 No detached bungalow	1 x 2 bed	New	No	GDN	0.032
Bishopthorpe	Bishopthorpe	84 Montague Road Bishopthorpe	459437	447291	Village	16/02861/FUL	08/03/2017	Not yet started	08/03/2020	0	1	1	1	1	1 No detached bungalow	1 x 4 bed	New	No	GDN	0.030
HewW		Garden to R/O 79-85 Stockton Lane	482161	453428	Urban	16/02923/FUL	11/08/2017	Not yet started	11/08/2020	0	9	9	9	9	7 No detached houses, 2 No detached bungalows	2 x 2 bed detached bungalows, 2 x 3, 3 x 3 & 2 x 5 bed detached houses	New	No	GDN	0.590
Raw & Cliff	Clifton Wtl	Proposed Development Site at Clifton Technology Centre	459049	454891	Sub-Urban	16/01533/FUL	18/01/2017	Under Construction	N/A	0	3	3	3	3	3 No town houses	3 x 2 bed	New	No	BF	0.037
Guilhi		Coal Yard 11 Mansfield Street	460990	452131	City Centre Ext 2	17/02702/FULM	15/03/2018	Not yet started	15/03/2021	0	23	23	23	23	23 No Flats (Clusters)	7 x 1, 3 x 5, 13 x 6 bed	New	No	BF	0.156
Mick		Oliver House Bishophill Junior	459974	451417	City Centre	15/02645/FULM	25/11/2016	Under Construction	N/A	0	34	34	34	34	34 No flats	5 x 1, 29 x 2 bed	New	No	BF	0.196
Guilhi		G&G Fisheries 64 Clarence Street	460317	452711	Urban	16/01960/FUL	27/01/2017	Under Construction	N/A	0	3	3	2	2	3 No flats	3 x 1 bed	Conv/New	Yes-1	BF	0.019
Raw & Cliff W		The Diocese of York Diocese House Aviator Court	458850	455060	Sub-Urban	17/00083/ORC	17/03/2017	Under Construction	N/A	8	25	17	17	17	17 No flats	7 x 1, 10 x 2 bed	COU	No	BF	0.350
Hunt & Nel	Huntington	Guildford Construction Ltd 10 Roland Court Huntington	461314	455121	Sub-Urban	16/02747/ORC	28/04/2017	Not yet started	24/04/2022	0	2	2	2	2	2 No flats	1 x 1, 1 x 2 bed * not confirmed	COU	No	BF	0.007
Raw & Cliff	Clifton Wtl	British Red Cross 5-6 Marsden Park	459182	454846	Sub-Urban	17/01075/ORC	07/07/2017	Under Construction	N/A	0	4	4	4	4	4 No flats	TBA	COU	No	BF	0.032
Mick		95-97 Micklegate	459832	451541	City Centre	17/02625/FUL	12/02/2018	Under Construction	N/A	0	6	6	5	5	6 No flats	2 x 1, 4 x 2 bed	Conv/New	Yes -1	BF	0.023
Hunt & Nel	Huntington	Sunny Lands North Lane Huntington	464324	456410	Rural	16/01561/FUL	03/04/2017	Not yet started	03/04/2020	0	1	1	0	0	1 No detached house	1 x 4 bed	New	Yes (demolish -1)	BF	0.189
Fulford & H	Heslington	Pool Bridge Farm Wheldrake Lane Crockey Hill	464121	446360	Rural	17/00411/OUT	19/05/2017	Not yet started	19/05/2020	0	1	1	1	1	1 No detached house	1 x 2 bed	COU	No	GF	0.055
Hunt & Nel	Huntington	25 New Lane Huntington	461804	455516	Sub-Urban	15/02677/FUL	27/06/2017	Not yet started	27/06/2020	0	5	5	5	5	5 No detached houses	2 x 3 bed, 3 x 4 bed	COU/New	No	GF	0.280
Osbaldwick	Dunnington	Lodge Farm Hull Road Dunnington	468309	451491	Rural	17/01088/FUL	04/07/2017	Not yet started	04/07/2020	0	3	3	3	3	2 No detached houses, 1 No detached bungalow	2 x 4 bed detached houses, 1 x 2 bed detached bungalow	COU	No	GF	0.481
Clifton		St Raphael Guest House 44 Queen Anne's Road	459724	452497	Urban	17/00331/FUL	04/04/2017	Not yet started	04/04/2020	0	1	1	1	1	1 No town house	1 x 5+ bed	COU	No	BF	0.013
Copmanthorpe	Copmanthorpe	27 Horseman Lane Copmanthorpe	456403	447226	Village	17/00055/FUL	06/04/2017	Under Construction	N/A	0	1	1	0	0	1 no detached house	1 x 4 bed	New	Yes (demolish -1)	BF	0.083
Rural W	Askham Bryan	110 Main Street Askham Bryan	454943	448369	Small Village	17/00718/FUL	25/05/2017	Not yet started	25/05/2020	0	1	1	0	0	1 No detached house	1 x 5 bed	New	Yes (demolish -1)	BF	0.205
Guilhi		Pizza Hut Ltd 10 Pavement	460479	451774	City Centre	17/00835/FUL	09/06/2017	Not yet started	09/06/2020	0	8	8	8	8	8 No flats	8 x 1 bed	COU	No	BF	0.029
Raw & Cliff	Clifton Wtl	Buildmark House George Cayley Drive	459205	454817	Sub-Urban	17/00732/FUL	09/06/2017	Not yet started	09/06/2020	0	8	8	8	8	8 No flats	4 x 1, 4 x 2 bed	New	No	BF	0.113
Clifton		24 Filey Terrace	460122	453206	Urban	17/00909/FUL	13/06/2017	Under Construction	N/A	0	2	2	1	1	2 No flats	1 x 1, 1 x 2 bed	Conv	Yes -1	BF	0.008
Dring & Wthp		Aldersyde House Aldersyde	458345	449101	Sub-Urban	16/02511/FUL	14/06/2017	Not yet started	14/06/2020	0	2	2	2	2	2 No town houses	2 x 2 bed	Conv	Yes -1	BF	0.062
Guilhi		Hill Giftware Ltd 46 Goodramgate	460462	452098	City Centre	17/00321/FUL	19/06/2017	Not yet started	19/06/2020	0	1	1	1	1	1 No flat	1 x 3 bed	COU	No	BF	0.008
Fisher		134 Lawrence Street	461610	451316	City Centre Ext 2	17/01045/FUL	20/06/2017	Not yet started	20/06/2020	0	2	2	2	2	2 No flats	2 x 2 bed	Conv	No	BF	0.027
Dring & Wthp		5 Mayfield Grove	458745	449814	Urban	16/00725/FUL	11/07/2017	Not yet started	11/07/2020	0	3	3	2	2	2 No semi-detached houses, 1 No detached bungalow	2 x 3 bed semi-detached houses and 1 x 2 bed detached bungalow	New	Yes (demolish -1)	GDN	0.061
Westfield		61a Gale Lane	457284	450825	Sub-Urban	17/00555/FUL	31/08/2017	Not yet started	31/08/2020	0	7	7	6	6	5 No flats, 2 No semi-detached bungalows	5 x 1 bed flats, 2 x 2 bed semi-detached bungalows	New	Yes (demolish -1)	GDN	0.094
Dring & Wthp		11 Highmoor Road	457759	449850	Sub-Urban	17/01435/FUL	18/08/2017	Under Construction	N/A	0	1	1	1	1	1 No detached house	1 x 2 bed	New	No	GDN	0.019

	Strensall	Stockton o	Laurel House The Village Stockton on Forest	465629	455898	Small Village	17/00726/FUL	29/09/2017	Not yet started	29/09/2020	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.111
	Hax & Wg	Haxby	87 Greenshaw Drive Haxby	460547	457924	Large Village	17/01697/FUL	06/10/2017	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.021
	Guilhl		Hilary House St Saviours Place	460665	451993	City Centre	16/00701/FUL	Won on Appeal 22/06/2017	Not yet started	22/06/2020	0	1	1	1	1 No flat	1 x 3 bed	Conv	No	BF	0.110
	Mick		198 Mount Vale	459193	450768	Urban	17/00716/FUL	30/06/2017	Not yet started	30/06/2020	0	1	1	1	1 No flat	1 x 1 bed	Conv	No	BF	0.010
	Fulford & H	Fulford	Cemetery Lodge Fordlands Road	461279	448653	Rural	17/00861/FUL	25/07/2017	Not yet started	25/07/2020	0	1	1	0	1 No flat	1 x 1 bed	COU/Conv	No	BF	0.050
	Guilhl		G&G Fisheries 64 Clarence Street	460335	452740	Urban	17/01237/FUL	26/07/2017	Under Construction	N/A	0	2	2	2	2 No flats	2 x 1 bed	New	No	BF	0.010
	Wheldrake	Elvington	Home Lea Elvington Lane Elvington	467908	448792	Rural	17/00712/FUL	18/08/2017	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 2 bed	COU	No	BF	0.075
	Clifton		Bedingham & Co 1b Newborough Street	459965	452903	Urban	17/01600/FUL	25/08/2017	Not yet started	25/08/2020	0	2	2	2	2 No flats	2 x 1 bed	COU	No	BF	0.014
	Strensall	Stockton o	Garage at 30 The Limes Stockton on Forest	465422	455752	Small Village	17/01418/FUL	25/08/2017	Not yet started	25/08/2020	0	1	1	1	1 No detached bungalow	1 x 2 bed	New	No	BF	0.030
	Strensall	Stockton o	Hermilage Farm House Malton Road Stockton on Forest	465208	457733	Rural	17/01016/FUL	31/08/2017	Not yet started	31/08/2020	0	1	1	0	1 No detached house	1 x 4 bed	New	Yes (demolish -1)	BF	0.150
	Guilhl		12 Castlegate	460398	451619	City Centre	17/01562/FUL	04/09/2017	Under Construction	N/A	0	3	3	-6	3 No town houses	2 x 3, 1 x 5 bed	Conv	Yes - 9	BF	0.024
	Fulford & H	Fulford	Former Saxon House 71-73 Fulford Road	460813	450842	Urban	15/02888/FUL	14/09/2017	Under Construction	N/A	0	10	10	10	10 No flats	5 x 1, 4 x 2, 1 x 3 bed	COU	No	BF	0.053
	Bishopthor	Bishopthor	Cavendish Jewellers Ltd Garth Cottage Sim Balk Lane	459095	447979	Rural	17/01182/FUL	11/08/2017	Not yet started	11/08/2020	0	1	1	1	1 No detached house	1 x 3 bed	COU	No	BF	0.070
	Guilhl		First Floor Flat 24 Gillygate	460160	452324	City Centre	17/01451/FUL	20/09/2017	Not yet started	20/09/2020	0	3	3	2	3 No flats	1 x 1, 2 x 2 bed	Conv	Yes -1	BF	0.027
	Clifton		2 Ratcliffe Street	459977	453314	Urban	17/01787/FUL	26/09/2017	Not yet started	26/09/2020	0	1	1	1	1 No detached bungalow	1 x 1bed	New	No	BF	0.006
	Westfild		Wards Newsagents 45 York Road Acomb	457664	451436	Urban	17/01608/FUL	29/09/2017	Under Construction	N/A	1	3	2	2	2 No flats	2 x 1 bed	Conv	Yes -1	BF	0.012
	Guilhl		Monkgate Guest House 65 Monkgate	460786	452476	City Centre	17/01596/FUL	03/10/2017	Not yet started	03/10/2020	0	1	1	1	1 no town house	1 x 6 bed	COU	No	BF	0.010
	Fisher		Alma House 15 Alma Terrace	460764	450524	Urban	17/01763/FUL	31/10/2017	Not yet started	31/10/2020	0	7	7	6	7 No flats	1 x 1, 6 x 2 bed	COU/Conv	Yes -1	BF	0.041
	Guilhl		The Fleeting Arms 54 Gillygate	460219	452399	City Centre	17/00580/FULM	06/10/2017	Under Construction	N/A	0	18	18	17	18 No flats (studio units)	18 x 1 bed	COU/Conv	Yes -1	BF	0.072
	Westfild		63 Green Lane Acomb	457646	451081	Urban	17/00884/FUL	06/10/2017	Not yet started	06/10/2020	0	4	4	3	1 No detached house, 2 No semi-detached houses, 1 No detached bungalow	1 x 3 bed detached house, 2 x 3 bed semi-detached houses, 1 x 2 bed detached bungalow	New	Yes (demolish -1)	GDN	0.098
	Westfild		24 Kir Crescent	457372	451034	Sub-Urban	17/01440/FUL	10/10/2017	Not yet started	10/10/2020	0	1	1	1	1 No town house	1 x 2 bed	New	No	GDN	0.017
	Holgate		9 Holly Bank Grove	458703	450739	Urban	17/01912/FUL	06/11/2017	Not yet started	06/11/2020	0	1	1	1	1 No town house	1 x 3 bed	New	No	GDN	0.020
	Hunt & Ne	Huntington	Arabesque House Monks Cross Drive Huntington	462443	455162	Sub-Urban	17/01369/ORC	31/07/2017	Not yet started	31/07/2022	0	56	56	56	56 No flats	54 x 1, 2 x 2 bed	COU	No	BF	0.183
	Guilhl		Smiths Gore 48 Bootham	459955	452355	City Centre	17/01541/ORC	17/08/2017	Not yet started	17/08/2022	0	11	11	11	11 No flats	11 x 2 bed	COU	No	BF	0.118
	Raw & Cliff	Clifton Wtd	Environment Agency Coverdale House Aviator Court	458892	454985	Sub-Urban	18/00172/ORC	02/10/2017	Not yet started	02/10/2020	0	34	34	34	34 No flats	34 x 1 bed	COU	No	BF	0.484
	Raw & Cliff	Clifton Wtd	Home Housing Association Ltd 131 Brailsford Crescent	459435	453903	Urban	17/02119/FUL	08/11/2017	Not yet started	08/11/2020	0	2	2	2	2 No flats	2 x 1 bed	COU	No	BF	0.026
	Mick		The Falcon Tap 94 Micklegate	459842	451594	City Centre	17/01468/FULM	13/11/2017	Not yet started	13/11/2020	0	11	11	10	11 No flats	10 x 1, 1 x 3 bed	Conv/New	Yes -1	BF	0.041
	Guilhl		Rear of 25 Bootham	460080	452317	City Centre	17/01445/FUL	15/11/2017	Not yet started	15/11/2020	0	8	8	8	8 No flats	5 x 1, 3 x 2 bed	New	No	BF	0.043
	Rural W	Skelton	Woodstock Lodge Corban Lane Wigginton	458123	459074	Rural	17/01702/FUL	17/11/2017	Not yet started	17/11/2020	0	1	1	0	1 No detached house	1 x 6 bed	Conv	Yes -1	BF	0.500
	Mick		4 Bridge Street	460163	451623	City Centre	17/01816/FUL	24/11/2017	Not yet started	24/11/2020	0	1	1	1	1 No Flat	1 x 2 bed	COU	No	BF	0.008
	Mick		Holmea Guest House 6 Southlands Road	460032	450734	Urban	17/01257/FUL	28/11/2017	Not yet started	28/11/2020	0	1	1	1	1 No town house	1 x 5 bed	COU	No	BF	0.009
	Guilhl		Bank of Scotland 6 Nessgate	460328	451857	City Centre	17/02451/ORC	11/12/2017	Not yet started	11/12/2022	0	16	16	16	16 No flats	16 x 1 bed	COU	No	BF	0.041
	Guilhl		23 Piccadilly	460662	451543	City Centre	17/02624/ORC	28/12/2017	Not yet started	28/12/2022	0	24	24	24	24 No flats	9 x 1, 15 x 2 bed	COU	No	BF	0.107
	Guilhl		Yh Training Services Ltd York House 15 Clifford Street	460370	451583	City Centre	17/02925/ORC	05/02/2018	Not yet started	05/02/2023	0	4	4	4	4 no flats	4 x 2 bed	COU	No	BF	0.026
	Raw & Cliff	Clifton Wtd	Land to West of Block D Aviator Court	458918	455075	Sub-Urban	17/03067/FUL	05/03/2018	Not yet started	05/08/2021	0	6	6	6	6 No flats	4 x 1, 2 x 2 bed	New	No	BF	0.133
	Osbaiddw	Osbaiddw	Land to South of 78 Osbaiddw Lane	462993	451896	Sub-Urban	17/01800/FUL	17/11/2017	Not yet started	17/11/2020	0	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	GDN	0.040
	Heworth	Without	7 Woodlands Grove	462134	453241	Urban	17/01890/FUL	17/11/2017	Not yet started	17/11/2020	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.020
	Hunt & Ne	Huntington	1 Meadow Way Huntington	461869	455736	Sub-Urban	17/02397/FUL	30/11/2017	Not yet started	30/11/2020	0	1	1	1	1 No detached bungalow	1 x 2 bed	New	No	GDN	0.019
	Westfild		21 Stirrup Close	456774	449898	Sub-Urban	17/01453/FUL	01/12/2017	Not yet started	01/12/2020	0	1	1	1	1 No town house	1 x 3 bed	New	No	GDN	0.012
	Rural W	Upper Pop	49 Station Road Upper Poppleton	455940	453865	Large Village	17/02143/FUL	30/11/2017	Under Construction	N/A	0	1	1	0	1 No detached bungalow	1 x 3 bed	New	Yes -1	GDN	0.095







	Guilhi		Proposed Hotel 46-50 Piccadilly (Residential Part of Scheme)	460615	451538	City Centre	17/00429/FULM	18/12/2017	Not yet started	18/12/2020	0	8	8	8	8	8 No flats	8 x 2 bed	New	No	BF	0.067
	Fulford & H	Heslington	Little Hall Main Street Heslington	462764	450243	Sub-Urban	17/01867/FUL	20/12/2017	Not yet started	20/12/2020	0	1	1	1	1	1 No town house	1 x 3 bed	Conv	No	BF	0.184
	Mick		Swinton Insurance 1Bishopthorpe Road	460171	451066	Urban	17/02575/FUL	20/12/2017	Not yet started	20/12/2020	0	1	1	1	1	1 No flat	1 x 2 bed	COU	No	BF	0.073
	Westfld		71 Green Lane Acomb	457650	451025	Urban	17/02293/FUL	08/12/2017	Under Construction	N/A	0	1	1	1	1	1 No flat	1 x 2 bed	COU	No	BF	0.096
	Clifton		Doctors Surgery 32 Clifton	459619	452725	Urban	17/02290/FUL	10/01/2018	Not yet started	10/01/2021	0	2	2	2	2	2 No town houses	2 x 1 bed	COU	No	BF	0.012
	Guilhi		Fiesta Latina 14 Clifford Street	460335	451555	City Centre	17/02224/FU	12/01/2018	Not yet started	12/01/2021	0	10	10	10	10	10 No flats	4 x 1, 6 x 2 bed	COU	No	BF	0.037
	Clifton		Archbishop Holgate Boathouse Sycamore Terrace	459504	452136	Urban	17/02717/FUL	12/01/2018	Not yet started	12/01/2021	0	1	1	1	1	1 No detached house	1 x 4 bed	New	No	BF	0.060
	Mick		20 Priory Street	459897	451451	City Centre	17/01238/FUL	15/01/2018	Not yet started	15/01/2021	0	2	2	2	1	2 No flats	2 x 1 bed	New	Yes (demolish -1)	BF	0.010
	Heworth		Heworth Court Hotel 76 Heworth Green	461405	452725	Urban	17/02492/FUL	01/02/2018	Not yet started	01/02/2021	0	2	2	2	2	2 No town houses	2 x 4 bed	COU	No	BF	0.122
	Clifton		338 Burton Stone Lane	460122	453949	Urban	17/02798/FUL	02/02/2018	Not yet started	02/02/2021	0	1	1	1	1	1 No detached bungalow	1 x 2 bed	New	No	GDN	0.021
	Osbaldwick	Dunnington	The Ridings 95 York Street Dunnington	466499	452324	Village	16/02663/FUL	8/2/18 Won on Appeal	Not yet started	08/02/2021	0	1	1	1	1	1 no detached bungalow	1 x 2 bed	New	No	GDN	0.037
	Strensall	Stockton on Forest	Whitecroft Sandy Lane Stockton on Forest	466056	456506	Small Village	17/02292/FUL	12/02/2018	Not yet started	12/02/2021	0	1	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.055
	Dring & Withp		26 Tadcaster Road Dringhouses	458759	449783	Urban	15/02726/FULM	09/03/2018	Not yet started	09/03/2021	0	11	11	11	11	3 No detached houses, 2 No detached bungalows, 6 No town houses	2 x 4, 1 x 5 bed detached houses, 2 x 3 bed detached bungalows, 6 x 3 bed town houses	New	No	GDN	0.520
	Copmanthorpe	Copmanthorpe	Land to R/O 15 Tadcaster Road Copmanthorpe	456867	447475	Village	17/03069/FUL	15/03/2018	Not yet started	15/03/2021	0	1	1	1	1	1 No detached house	1 x 5 bed	New	No	GDN	0.120
	Guilhi		Abbeyfield Veterinary Centre 49 Clarence Street	460271	452713	Urban	17/02739/FUL	06/02/2018	Not yet started	06/02/2021	0	2	2	2	2	2 no flats (student cluster units)	2 x 10 bed (cluster units)	COU	No	BF	0.040
	Rural W	Askham R	Askham Fields Farm York Road Askham Richard	453306	447595	Rural	17/02997/FUL	08/02/2018	Not yet started	08/02/2021	0	2	2	0	0	1 No detached house & 1 No flat	1 x 4 bed detached house, 1 x bed flat	New	Yes (demolish -2)	BF	0.280
	Guilhi		93 Union Terrace	460289	452802	City Centre	17/00722/FUL	12/02/2018	Not yet started	12/02/2021	0	2	2	2	1	2 No flats	2 No flats	Conv	Yes (-1)	BF	0.017
	Guilhi		Grove House 40-48 Penleys Grove Street	460593	452567	Urban	17/01129/FULM	13/02/2018	Not yet started	13/02/2021	0	32	32	32	32	32 No Flats	28 x 1, 1 x 2, 3 x 3 bed	COU	No	BF	0.250
	Holgate		107 Carr Lane	457619	451885	Sub-Urban	17/02973/FUL	14/02/2018	Not yet started	14/02/2021	0	5	5	4	4	5 No flats	4 x 1, 1 x 2 bed	Conv	Yes (-1)	BF	0.028
	Osbaldwick	Holby	Sycamore Cottage Main Street Holby	467385	454304	Small Village	17/02966/FUL	15/02/2018	Not yet started	15/02/2021	0	1	1	1	1	1 no detached bungalow	1 x 2 bed	Conv	No	BF	0.170
	Guilhi		The Jorvik Hotel 52 Marygate	459821	452189	City Centre	17/02250/FUL	23/02/2018	Not yet started	23/02/2021	0	2	2	2	2	2 No town houses	2 x 5+ bed	New	No	BF	0.077
	Fisher		1B Wolsley Street	461167	451125	City Centre Ext 2	17/03024/FUL	27/02/2018	Not yet started	27/02/2021	0	1	1	1	1	1 No flat	1 x 2 bed	COU	No	BF	0.008
	Westfld		HSBC 19 York Road Acomb	457768	451456	Urban	17/02912/RFPFR	15/03/2018	Not yet started	15/03/2023	0	1	1	0	0	1 No town house	1 x 4 bed	COU/Conv	Yes (-1)	BF	0.034
	Heworth		81 Fifth Avenue	461423	452107	Urban	18/00058/FUL	12/03/2018	Not yet started	12/03/2021	0	2	2	2	1	2 No town houses	2 x 2 bed	Conv	Yes (-1)	BF	0.029
	Guilhi		147 Lawrence Street	461673	451359	City Centre Ext 2	17/03063/FUL	26/03/2018	Not yet started	26/03/2021	0	4	4	3	3	4 No flats	1 x 1, 3 x 2 bed	Conv	Yes (-1)	BF	0.017
	Fulford & H	Fulford	Adams House Hotel 5 main Street Fulford	460922	449602	Urban	16/02737/FUL	08/03/2017	Not yet started	08/03/2020	0	1	1	1	1	1 No detached house	1 x 5+ bed	COU	No	BF	0.065

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	Skell/Raw & CliffW	Clifton Without	The Grain Stores Water Lane	459367	454429	Urban/sub-urban	15/00121/REM M	12/05/2015	Under Construction	N/A	122	215	93	93	44 No detached houses, 10 No semi-detached houses, 39 No Town Houses	11 x 3, 33 x 4 bed detached houses, 6 x 3, 4 x 4 bed semi-detached houses, 5 x 2, 27 x 3, 4 x 4, 3 x 5 bed town houses	New	No	BF	6.000
	Mick		Former Terrys Factory Bishopthorpe Road Phase II	459961	449909	Urban	14/01716/FUL M	24/02/2015	Under Construction	N/A	41	230	189	189	150 No flats, 7 No detached houses, 32 No town houses	2 x 3, 5 x 4 bed detached houses, 5 x 2, 27 x 3, 16 x 1, 134 x 2 bed flats	New	No	BF	
	Mick		Former Terrys Factory Bishopthorpe Road Phase III	459961	449909	Urban	15/00456/FUL M	22/07/2015	Under Construction	N/A	161	163	2	2	2 No flats	2 x 2 bed	COU	No	BF	
	Fulfrd		Germany Beck Site East of Fordlands Road	461663	449121	Sub-Urban	12/00384/REMN	09/05/2013	Under Construction	N/A	0	655	655	655	215 No detached houses, 142 no semi-detached houses, 25 No detached bungalows, 197 Town houses, 76 No flats	2 x 2, 176 x 3, 34 x 4 & 3 x 5 bed detached houses, 49 x 2 & 93 x 3 bed semi detached houses, 25 x 2 bed detached bungalows, 150 x 2, & 47 x 3 bed town houses, 8 x 1 & 68 x 2 bed flats	New	No	GF	16.600
	Osbaldwick	Osbaldwick	(Phase 3 & 4) Land to West of Metcalfe Lane Osbaldwick	462913	452260	Sub-Urban	12/01878/REMN	13/03/2013	Under Construction	N/A	189	299	110	110	13 No detached houses, 40 No semi-detached houses, 2 No detached bungalows, 2 No semi-detached bungalows, 65 No town houses, 24 No flats	8 x 4 & 3 x 5 bed detached houses, 6 x 3 & 29 x 4 bed semi-detached houses, 6 x 2 bed semi detached bungalows, 40 x 3 & 9 x 4 bed town houses, 3 x 1 & 21 x 2 bed flats	New	No	GF	
	Osbaldwick	Osbaldwick	(Phase 4 - amended) Land to West of Metcalfe Lane Osb	462913	452260	Sub-Urban	16/00342/FULM	18/11/2016	Under Construction	N/A	0	36	36	36	4 No detached houses, 10 No semi-detached houses, 22 No town houses	3 x 3, 1 x 4 bed detached houses, 4 x 3, 6 x 4 bed semi-detached houses, 18 x 3, 4 x 4 bed town houses	New	No	GF	
	Guilhi		Hungate Development Site (Blocks D, F, & H)	460784	451839	City Centre	15/01709/OUTM	18/07/2006	Not yet started	N/A	0	466	466	466	662 No flats (Block D = 186 Flats, Block F = 101 flats, Block H = 179 flats)	Blocks D & F: 149 x 1, 116 x 2, 22 x 3 bed both reserved matters (Block D): 97 x 1, 81 x 2, 8 x 3 bed and Block F: 52 x 1, 35 x 2 and 14 x 3 bed) - Blocks H TBA	New	No	BF	4.100

Guilthi		Hungate Development Site (Block G)	460784	451839	City Centre	17/03032/REMN	19/02/2018	Not yet started	20/12/2020	0	196	196	196	196 Flats	129 x 1, 67 x 2 bed	New	No	BF	
FisherGate		St Josephs Convent of Poor Clare Collenlines Lawrence	461372	451321	City Centre Ext 2	14/02404/FULM	09/03/2015	Under Construction	N/A	526	542	16	15	16 No flats	15 x 1, 1 x 3, bed clusters	New/COU	Yes -1	BF	2,560
Fulford & Fulford	Fulford	Royal Masonic Benevolent Institute Connaught Court St	460688	449521	Sub-Urban	13/03481/FULM	13/06/2016	Not yet started	13/06/2019	0	14	14	14	14 No detached houses	2 x 4, 8 x 5, 4 x 6 bed	New	No	GF	1,100
FisherGate		York Barbican Paragon Street	460848	451211	City Centre Ext 2	13/02135/FULM	24/08/2017	Not yet started	24/08/2020	0	187	187	187	187 No flats	57 x 1, 130 x 2 bed	New	No	BF	0,960
Guilthi		The Cocoa Works Haxby Road	460535	453542	Urban	17/00284/FULM	14/09/2017	Not yet started	14/09/2020	0	258	258	258	258 Flats	37 x 1, 205 x 2, 16 x 3 bed	COU	No	BF	2,350

3409 3345

	Housing Allocation Site
	Greenfield Site
	Garden Infill Site
	ORC - Office Residential Conversion
	Student Accommodation
	Retirement Living Accommodation

APPENDIX 4

Analysis of Proposed Allocations and Expected Rates of Delivery

Ref	Site	Site Area	Yield	Timing	Density	Years 1 to 5	Years 6-10	Years 11-15	Years 16-21
H1	Former Gas Works, 24 Heworth Green (Phase 1)	2.87	271	Short Term (Years 1 -5)	94.43	271			
H1	Former Gas works, 24 Heworth Green (Phase 2)	0.67	65	Medium Term (Years 6-10)	97.01	65			
H3	Burnholme School	1.90	72	Short Term (Years 1 -5)	37.89	72			
H5	Lowfield School	3.64	162	Short to Medium term (Years 1 -10)	44.51	80	82		
H6	Land R/O The Square Tadcaster Road	1.53	0	Short to Medium Term (Years 1 -10)	0.00				
H7	Bootham Crescent	1.72	86	Short to Medium Term (Years 1 -10)	50.00	46	40		
H8	Askham Bar Park & Ride	1.57	60	Short Term (Years 1 -5)	38.22	60			
H10	The Barbican	0.96	187	Short Term (Years 1 -5)	194.79	187			
H20	Former Oakhaven EPH	0.33	56	Short Term (Years 1 -5)	169.70	56			
H22	Former Heworth Lighthouse	0.29	15	Short Term (Years 1 -5)	51.72	15			
H23	Former Grove House EPH	0.25	11	Short Term (Years 1 -5)	44.00	11			
H29	Land at Moor Lane Copmanthorpe	2.65	88	Short to Medium Term (Years 1 -10)	33.21	88			
H31	Eastfield Lane Dunnington	2.51	76	Short to Medium Term (Years 1 -10)	30.28	76			
H38	Land RO Rufforth Primary School Rufforth	0.99	33	Short to Medium Term (Years 1 -10)	33.33	33			
H39	North of Church Lane Elvington	0.92	32	Short to Medium Term (Years 1 -10)	34.78	32			
H46	Land to North of Willow Bank and East of Haxby Road, New Earswick	2.74	104	Short to Medium Term (Years 1 -10)	37.96	104			
H52	Willow House EPH, Long Close Lane	0.20	15	Short Term (Years 1 -5)	75.00	15			
H53	Land at Knapton Village	0.33	4	Short Term	12.12	4			
H55	Land at Layerthorpe	0.20	20	Short Term (Years 1 -5)	100.00	20			
H56	Land at Hull Road	4.00	70	Short Term (Years 1 -5)	17.50	70			
H58	Clifton Without Primary School	0.70	25	Short Term (Years 1 -5)	35.71	25			
H59	Queen Elizabeth Barracks – Howard Road, Strensall			Short to Medium term (Years 1 –10)					
ST1	British Sugar/Manor School	46.30	1200	Lifetime of the Plan (Years 1-16)	25.92	0	600	600	
ST2	Former Civil Service Sports Ground Millfield Lane	10.40	266	Short to Medium Term (Years 1 -10)	25.58	166	100		
ST4	Land adj. Hull Road & Grimston Bar	7.54	211	Short to Medium Term (Years 1 -10)	27.98	111	100		
ST5	York Central	35.00	1700	Lifetime of the Plan and Post Plan period (Years 1-21)	48.57	0	500	600	600
ST7	Land East of Metcalfe Lane	34.50	845	Lifetime of the Plan (Years 1 -16)	24.49	200	295	350	
ST8	Land North of Monks Cross	39.50	968	Lifetime of the Plan (Years 1 -16)	24.51	250	300	418	
ST9	Land North of Haxby	35.00	735	Lifetime of the Plan (Years 1 -16)	21.00	150	285	300	
ST14	Land to West of Wigginton Road	55.00	1348	Lifetime of the Plan and Post Plan period (Years 1 -21)	24.51	200	400	400	348
ST15	Land to West of Elvington Lane	159.00	3339	Lifetime of the Plan and Post Plan period (Years 1 -21)	21.00	300	900	900	900
ST16	Terrys Extension Site – Terry's Clock Tower (Phase 1)	2.18	22	Short to Medium Term (Years 1-5)		22			
ST16	Terry's Extension Site – Terry's Car Park (Phase 2)		33	Short to Medium Term (Years 1 – 10)			33		
ST16	Terry's Extension Site – Land to rear of Terry's Factory (Phase 3)		56	Short to Medium Term (Years 1 – 10)			56		
ST17	Nestle South (Phase 1)	2.35	263	Short to Medium Term (Years 1 -10)	111.91	100	163		
ST17	Nestle South (Phase 2)	4.70	600	Medium to Long Term (Years 6 – 15)	127.66		300	300	
ST31	Land to the South of Tadcaster Road, Copmanthorpe	8.10	158	Short to Medium Term (Years 1-10)	19.51	50	108		
ST32	Hungate (Phases 5+)	2.17	328	Short to Medium Term (Years 1-10)	151.15	128	200		
ST33	Station Yard, Wheldrake	6.00	147	Short to Medium Term (Years 1-10)	24.50	47	100		
ST35**	Queen Elizabeth Barracks, Strensall	28.80		Medium to Long Term (Years 6-15)	0.00				
ST36**	Impfal Barracks, Fulford Road	18.00	769	Post Plan period (Years 16-21)	42.72				600
		525.51	14,440			3,054	4,562	3,868	2,448

Years 1-15
Years 1 to 21

11,484
13,932

APPENDIX 5

Analysis of Affordable Housing Models – Yorvik Homes

Illustration No 1
Discounted Market Sale

3 Bedroom House	
Open Market Value	£300,000
Discount (40%)	£120,000
Purchase Price	<u>£180,000</u>
Deposit (10%)	£18,000
Mortgage	£162,000
Capital	£210
Interest	£444
Rate - 3.29%	
Total Monthly Payment	£655

The above illustration is from Darlington Building Society through a mortgage broker who has dealt with Discounted Market Sale Properties on another Yorvik Homes development in Richmondshire.

The DMS scheme has proved highly successful and offers homeowners the benefit of **freehold** ownership at a more affordable level than other tenures.

Illustration No 2
Transferred to RSL
Intermediate Rent

3 Bedroom House	
Open Market Rent	£900
20% Discount for Intermediate Rent	£180
Total Rent Per Calendar Month	£720

Illustration No 3
Transferred to RP
Shared Equity Property

3 Bedroom House	
Open Market Value	£300,000
50% Equity	<u>£150,000</u>
Monthly Mortgage Payment	£605
Intermediate Rent on Retained Equity	£360
Monthly Admin / Insurance Fees	£27
Total Monthly Cost	£992

In this illustration the freehold is owned by the RSL, and as such the purchasers are leaseholders, yet the leaseholder pays for 100% of repairs and maintenance.

The monthly cost when taking into account rent, mortgage and fees is significantly higher than that of DMS properties.

CONCLUSION DMS PROPERTIES ARE THE MOST AFFORDABLE HOUSING FOR PEOPLE ON MEDIUM INCOMES.

From: Paul Butler [REDACTED]
Sent: 22 July 2019 15:03
To: localplan@york.gov.uk
Cc: [REDACTED]
Subject: YORK LOCAL PLAN - PROPOSED MODIFICATIONS CONSULTATION - OSBALDWICK - SUPPORT FOR SITE REFERENCE ST7
Attachments: City of York Local Plan - Site ST7 - Osbaldwick - TWF - Form - July 2019.pdf; City of York Local Plan - Site ST7 - Osbaldwick - TWF - July 2019.pdf; ST7 - Osbaldwick - Previous Local Plan Reps.zip
Follow Up Flag: Follow up
Flag Status: Completed

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir or Madam,

We write on behalf of our clients TW Fields to provide City of York Council (CYC) with their representations to CYC's Proposed Modifications to the York Local Plan (June 2019).

Please find enclosed our representations to the Proposed Modifications consultation. We request our previous representations are considered alongside this letter as part of a holistic and comprehensive representation for Land East of Metcalfe Lane, Osbaldwick (Site Ref. ST17).

Our client continues to **support** CYC's identification of the site as a new Garden Village within the emerging City of York Local Plan. However, it is our view that CYC should have taken the opportunity presented through the Proposed Modifications consultation to resolve our concerns with the current red line site allocation boundary. Whilst the site can deliver 845 homes within the plan period within CYC's proposed site allocation boundary, it is our view that the current boundary should be expanded in order to enhance the community and green infrastructure that the site can deliver in respect of the policy aspirations required by Policy SS9 of the Publication Draft Local Plan.

Should you require any further details or clarification on the content of the enclosed representations please do not hesitate to contact me.

Kind regards,

Paul

Paul Butler
Director



www.pbplanning.co.uk

[REDACTED]
07970 506702
PO Box 827, York, YO31 6EE

City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make.

Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Paul
Last Name		Butler
Organisation (where relevant)	TW Fields	PB Planning Ltd
Representing (if applicable)		
Address – line 1		PO Box 827
Address – line 2		York
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		YO31 6EE
E-mail Address		
Telephone Number		07970 506702

Representations must be received by Monday 22 July 2019, up until midnight.

Representations received after this time will not be considered duly made.

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B - Your Representation

(Please use a separate Part B form for each issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM3, PM4, PM5, PM22 and PM44

Document:

Proposed Modifications & Housing Needs Update

Page Number:

Various

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Please see enclosed representations.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared **Justified**

Effective **Consistent with national policy**

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

Please see enclosed representations

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

Please see enclosed representations

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please see enclosed representations. We need to be present to fully put forward our case for the retention of the site allocation within the Local Plan.

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 2018 to inform the Local Plan process. We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't. City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

Signature

Date

Local Plan,
City of York Council,
West Offices,
Station Rise,
York, YO1 6GA

22nd July 2019

Dear Sir or Madam,

CITY OF YORK LOCAL PLAN – LAND EAST OF METCALFE LANE – TW FIELDS – SUPPORT FOR SITE REFERENCE ST7

We write on behalf of our client TW Fields (TWF) to provide City of York Council (CYC) with their representations to CYC's Proposed Modifications to the York Local Plan (June 2019).

From a review of the Proposed Modifications, it is clear that CYC have not taken the opportunity to modify the Local Plan to take on board the evidence we previously presented in our representations to earlier versions of the Local Plan, by letters dated 4th April 2018, 12th September 2016 and 27th October 2017. As a result, we remain concerned that the Local Plan cannot be considered sound in the context of Paragraph 182 of the NPPF.

This letter does not seek to re-iterate the comments made to CYC in our previously submitted representations. It provides a response specifically in respect of the Proposed Modifications to the Local Plan. In doing so it will summarise comments we have previously made where needed.

We request our previous representations are considered alongside this letter as part of a holistic and comprehensive representation for Land East of Metcalfe Lane, Osbaldwick (Site Ref. ST17).

Our client continue to **support** CYC's identification of the site as a new Garden Village within the emerging City of York Local Plan. However, it is our view that CYC should have taken the opportunity presented through the Proposed Modifications consultation to resolve our concerns with the current red line site allocation boundary.

Whilst the site can deliver 845 homes within the plan period within CYC's proposed site allocation boundary, it is our view that the current boundary should be expanded in order to enhance the community and green infrastructure that the site can deliver in respect of the policy aspirations required by Policy SS9 of the Publication Draft Local Plan.

Furthermore, a key matter that CYC need to consider in respect of the need to expand the site allocation boundary is the requirement to deliver a southern access to Osbaldwick Link Road. Extending the boundary as requested by these and previous representations will ensure that this required access point (as stipulated by Policy SS9) can be delivered.

Finally, and specifically with regards to CYC's proposed amendment to the Local Plan's objectively assessed housing needs figure (to 790 dwellings per annum), we share the view of the wider development industry that this figure is not justified by compelling evidence on account of it not aligning with the methodological requirements established by national planning guidance. A more accurate representation of the objectively assessed housing needs for the City would lead to a significant increase in the number of homes that the Local Plan should seek to deliver.

We provide further commentary on this point below. However, it is clear that alongside our request for an expansion to the site allocation boundary there is also a case to increase the number of homes that the site can deliver. Which is of course something that officers have previously recommended.

LAND EAST OF METCALFE LANE, OSBALDWICK – SUMMARY & PREVIOUSLY IDENTIFIED DEVELOPMENT OPTIONS

A summary of our previous representations is provided in the table below: -

Site ST7 – Representations Summary
<ul style="list-style-type: none"> • We fully support the principle of the proposed allocation of the site by CYC • Three deliverable and viable development proposals are being put forward for CYC's consideration: <ul style="list-style-type: none"> ○ Option 1 - The delivery of 845 homes (including up to 253 affordable homes) at the site alongside each of CYC's proposed "Planning Principles" with additional areas of recreational open space and landscaping. ○ Option 2 - The delivery of 975 homes (including up to 292 affordable homes) at the site to meet any potential increase in the City's housing requirements alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC's proposed "Planning Principles" for the site. ○ Option 3 - The delivery of 1,225 homes (including up to 368 affordable homes) at the site to meet any potential increase in the City's housing requirements alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC's proposed "Planning Principles" for the site. • The development proposals can deliver 315 homes within the first 5 years of the Local Plan and up to 1,225 homes within the plan period (Should our Option 3 be progressed). • The proposals will deliver a Sub-Urban Garden Village design philosophy with the provision of substantial community infrastructure including a primary school, village centre and public open space, allotments and recreational facilities. • The net developable residential area of each of the proposed options are similar in size to the current allocation site area prescribed by CYC. The expansion required to deliver each of the options in the manner we propose would not require a significant amount of further land to be released from the Green Belt when considered against the wider extent of the proposed boundaries of the York Green Belt. • Vehicular access will be taken from Murton Way, Stockton Lane & Bad Bargain Lane. Preferential walking and cycling routes are provided throughout the site to deliver direct routes which are logical and well-integrated to encourage use. Bus penetration routes will be provided through the site also. • The existing views and setting of York Minster, Millennium Way and Osbaldwick Conservation Area will be preserved and enhanced through a series of green corridors and retention of separation distances within the development masterplan. Including a large strategic greenspace located in the central area of the site in accordance with CYC's proposals. • Ecological mitigation will be provided through the retention of existing features. The site previously contained a SINC, however, the ecological value of this area of the site has now been lost due to recent engineering works undertaken by Yorkshire Water. • The development proposals replicate the historical development patterns of the City in respect of the formation of a satellite settlement located on the periphery of the main urban edge.

The site was identified by the Council because it is not located in an area of “Primary Constraint” and does not compromise York’s future Green Belt proposals. The development has been master-planned so that it will have minimum impact on the historic character and setting of the City. As stated above, the existing views and setting of York Minster, Millennium Way and Osbaldwick Conservation Area will be preserved and enhanced through a series of green corridors and retention of existing separation distances from present residential areas.

The development proposals replicate the historical development patterns of the City in respect of the formation of a satellite settlement located on the periphery of the main urban edge.

The site is strategically located to the east of the City, but importantly separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible. The development proposals are situated in a suitable and highly sustainable location in respect of connectivity to existing jobs and services and there are no technical or environmental (built and natural) constraints that would preclude the development of the site.

The site has been identified as strategic housing site allocation ST7 within iterations of the City of York Local Plan since June 2013. At that time the Preferred Options Local Plan identifies the site as having potential to deliver 1,800 homes. The number of homes to be provided at the site was retained at 1,800, along with an increase in the site’s allocation red line boundary, within the now withdrawn City of York Publication Draft Local Plan (October 2014). Prior to the withdrawal of the previous Publication Draft Local Plan, our clients undertook and submitted technical assessments associated with the delivery of the previously proposed red line site allocation boundary and the delivery of 1,800 homes at the site.

As CYC have previously undertaken public consultation and Sustainability Appraisal work in respect of the larger site, there remains the potential for the enlargement of the allocation back to the previously considered acceptable size, should CYC need to do so to meet the City’s increased housing needs.

This letter reiterates our client’s design philosophy for the proposed development of a Garden Village at the site and demonstrates the site’s deliverability for residential development in accordance with national planning guidance. In doing so we again draw the Council’s attention to the following documents that have been submitted alongside our promotion of the site: -

- Indicative Masterplan – 975 Homes – PRA Architects – August 2016
- Indicative Masterplan – 1,225 Homes – PRA Architects – October 2017

In our previously submitted representations we provided the key conclusions of a number of technical assessments associated with the development proposals. The parameters established within the comprehensive technical reports were utilised in the preparation of the indicative masterplans for the site.

As part of the preparation of these representations we have sought to prepare a masterplan to identify how the development proposals can deliver 845 homes within CYC’s proposed site allocation boundary. The updated masterplan is enclosed alongside this letter.

With regards to our proposed Option 2, which recommends the delivery of 975 homes at the site, CYC’s Officer’s endorsed an increase in the proposed site allocation from 34.5ha (845 homes) to 44ha (975 homes) to CYC’s Local Plan Working Group on the 10th July 2017. The reasoning behind the recommendation was as follows: -

“This reflects developers/landowners concerns raised regarding the viability/deliverability of the site, the related ability to deliver the planning principles including provision of educational and community facilities and concerns over the provision of site access to the south of the site. Officers consider that this boundary amendment could improve the viability of the site and ensure that the planning principles can be delivered.”

This option was also put forward by CYC's Officer's as a potential change to the Local Plan ahead of consultation in respect of the Publication Draft Local Plan at CYC's Local Plan Working Group on the 23rd January 2018.

Whilst CYC's Officer's recommendations were not approved on either occasion, we believe there is still a strong case for the expansion of the site in respect of both the site allocation boundary and housing numbers.

With regard to our proposed Option 3, the 1,225 home opportunity for the development of the site was previously put forward for CYC's consideration on account of the same reasons identified above for Option 2, but also to ensure the delivery of enduring and permanent Green Belt boundaries beyond the plan period.

Notwithstanding the above, we believe that it is of paramount importance that in the first instance CYC ensure that the site allocation boundary for their proposed number of homes (845) is correct to ensure the delivery of a Garden Village style development alongside the comprehensive delivery of CYC's community and green infrastructure aspirations for the site as required by Policy SS9 of the Publication Draft Local Plan.

Within our previous representations we provided an assessment of each of the development options against each of CYC's policy parameters identified within draft local plan policy SS9. For brevity, we do not seek to repeat this assessment here and ask that CYC refer to our previous submissions which are enclosed with this letter.

MEETING THE CITY OF YORK'S FUTURE HOUSING NEEDS

We maintain our view that there is a case for the identification of additional housing allocations to those currently proposed by CYC in order to meet the City's housing needs over the proposed plan period.

As part of the Proposed Modifications consultation a Housing Needs Update has been produced by GL Hearn, date January 2019. The report has been produced to consider the use of the 2016 subnational household projections (SNHP).

Originally the report was produced to support the Council's previous level of homes (867 per annum) and the decision of members to not include an affordability ration uplift, contrary to the recommendations of the report and officers. Notwithstanding the purpose of the report, it is now noted that the Council are seeking to reduce their OAN to 790 homes per annum, with this update forming the principle piece of evidence.

It is noted that using the 2014 household projections shows a starting point of 849 dwellings per annum, with a 15% affordability uplift resulting in an OAN of 976 dwellings per annum. This calculation is exactly the same as the approach advocated in the update report, however it uses the 2014 projections rather than the 2016 projections. In simple terms, the 2016 projections are not considered an appropriate starting point the OAN should be increased to 976 dpa.

The 2014-based MHCLG household projections should take preference to the 2016-based ONS household projections following the Government's technical consultation in respect of the 2018 NPPF's Standard Method, and the subsequent confirmation in the Planning Practice Guidance (PPG) that 2016-based ONS household projections should not be used for the purpose of calculating Standard Method.

It is considered that the 2014-based household projection for York should represent the demographic starting point of housing need. This shows need for 849 dwellings per annum (dpa) once the Council's vacancy rate assumption has been applied. The Council's 15% market signals uplift should be applied to this figure, resulting in OAN of 976 dpa.

However, the market signals uplift should also be considered in the context of the 30% market signals uplift applied under Standard Method, which results in overall need of 1,069 dpa.

Given that the evidence does not support the level of homes that the Local Plan is seeking to deliver, the proposed modifications in the plan in respect of the housing requirement are therefore all considered to be unsound.

Therefore, in order to make the plan sound, the housing figure should be adjusted upwards to reflect a robust assessment of the OAN.

The evidence maintains our previously presented case for the release of additional land as housing allocations within the emerging CYC Local Plan in order to meet the City's full objectively assessed housing needs, such as an extension of our client's Osbaldwick site to deliver at least 975 homes.

GREEN BELT TOPIC PAPER ADDENDUM

Evidence of the ability to expand the site allocation boundary of the Osbaldwick site is also presented in CYC's latest Green Belt Topic Paper Addendum.

The Osbaldwick site is assessed in Annex 5 of the Green Belt Topic Paper Addendum. The assessment includes the following analysis that we entirely support: -

- *As part of the strategy for accommodating York's assessed development needs the degree of harm has been judged to be far less than would be caused should the housing development in those settlements be located, instead, on the edge of the existing built up area of the City or in its surrounding settlements. As such, and as is set out in Historic England's response to consultation, a strategy in which part of York's development needs are met in new freestanding settlements beyond the ring road would help to safeguard the size and compact nature of the historic city, the perception of York being a free-standing historic city set within a rural hinterland, key views towards York from the ring road, and the relationship of the main built up area of York to its surrounding settlements.*
- *The site has been pulled away from the existing urban edge of Heworth Without, Meadlands and Osbaldwick to create a separate settlement or 'garden village'. Some important principles were addressed through the ongoing site selection process; principal amongst these was the need for development to reflect and respond to the impacts identified through Heritage Impact Appraisal, namely: that the development read as a settlement that is separate from York and sits within its own landscape context. A degree of loss of compactness is unavoidable; development would expand the perceived urban boundary outwards although the site itself would be separate.*
- *It is considered that the effects for the allocation boundary could be reduced to minor subject to the implementation of mitigation and treatment of the landscape.*
- *There are no designated heritage assets within the site, but to the south is Osbaldwick Conservation Area whose character could be impacted by development.*
- *The site sits within the general extent of the York Green Belt. The site is broadly contained by recognisable and permanent landscape features; it is partially contained by two strong hedge boundaries and tree boundaries to the west and part of the eastern boundary. It will be important to create a new Green Belt edge to the site's eastern boundary contiguous with strong existing hedgerows. Outgang Lane is established and the low level tree boundary to the south is also a recognisable feature. The northern boundary runs along Tang Hall Beck for the most part.*

The evidence we have presented in this and previous representations confirms that each of the proposed development options for the site has adhered to CYC's analysis of the Green Belt in this location of the City and each of the key planning parameters that need to be followed in order to protect the City's setting and character.

Each of the expanded site options seek to maintain a "gap" between the site and the surrounding settlement area to create a separate settlement. The assessment rightly identifies that the development of the site provides the potential to deliver permanent defensible boundaries through appropriate landscape mitigation. Accordingly, each of the development options being proposed can deliver this whilst ensuring that the settlement remains separate from the surrounding urban edge.

The net developable residential area of each of the proposed options are similar in size to the current allocation site area prescribed by CYC. The expansion required to deliver each of the options in the manner we propose would not require a significant amount of further land to be released from the Green Belt when considered against the wider extent of the proposed boundaries of the York Green Belt.

We therefore maintain our recommendation that the site allocation boundary be expanded to align with our development proposals for the site. The preferred option being decided in respect of housing needs.

MECHANISM TO AMEND THE SITE ALLOCATION BOUNDARY

Whilst CYC have not taken the opportunity through the Proposed Modifications consultation to amend the site allocation boundary in order to respond to the comments we have previously provided, the potential to do so still remains through the Examination in Public process, and specifically within any future Main Modifications to the Local Plan.

We ask that CYC consider the evidence provided within these and previously submitted representations and work with us should one of the number of identified reasons arise that would require a review or expansion of the site allocation boundary for the Osbaldwick site.

CONCLUSIONS

On the basis of the information provided within this letter, and the enclosed documentation, we wish to place on record our **support** for the proposed allocation of Land to the East of Metcalfe Lane which is currently proposed by CYC as a new Garden Village within the emerging City of York Local Plan.

Whilst we support the principles of the allocation of the site, we believe that amendments are required to the site's proposed boundaries in order to ensure that CYC's Garden Village philosophy for the site can be delivered alongside each of CYC's identified Planning Parameters.

Furthermore, these representations have also presented a compelling case for the release of additional land at the site in order to meet the City's full objectively assessed housing needs.

Consequently, we have presented three potential development options to the Council to provide a new Garden Village of either 845 homes, 975 homes or 1,225 homes, alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space, allotments and recreational facilities.

The site is strategically located to the east of the City, but importantly separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible.

The development proposals are situated in a **suitable** and highly sustainable location and there are no technical or environmental (built and natural) constraints that would preclude the development of the site. The site is **available** now as it is under the control of a regional development company who are

actively seeking to secure the site's allocation for residential development. The site can also be considered **achievable** as new homes can be delivered on the site within the next 5 years and indeed within the first five years of the Local Plan.

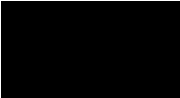
In light of the guidance provided in Paragraph 182 of the NPPF (2012), we consider the following: -

- The Local Plan is **positively prepared** in respect of the delivery of 845 homes at the Land East of Metcalfe Lane site as the delivery of homes from the site will contribute significantly to meeting the evidenced objectively assessed development and infrastructure requirements of the City.
- The Local Plan is **justified** in respect of the Land East of Metcalfe Lane site as compelling evidence has been provided in this and previously submitted representations to demonstrate that the site's allocation is an appropriate strategy for delivering a sustainable Garden Village of 845 homes in this location of the City, when considered against the reasonable alternatives, based on proportionate evidence;
- The Local Plan is **effective** as the proposed housing numbers at the Land East of Metcalfe Lane site are entirely deliverable within the plan period; &
- The Local Plan is **consistent with national policy** in respect of the Land East of Metcalfe Lane site as compelling evidence has been provided to demonstrate that the proposed development will deliver sustainable development within the plan period. Particular in respect of Paragraph 52 of the NPPF which identifies that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements that follow the principles of Garden Cities (or a Garden Village in this case).

Finally, in respect of procedural matters, we would like to work alongside CYC to finalise the site specific strategic development policy to be included within the final version of the Local Plan as part of the future Main Modifications process. Working together we can ensure that CYC's and the local community's planning parameters for the site are deliverable.

Should you require any further details or clarification on the content of this letter please do not hesitate to contact me.

Yours sincerely,

A black rectangular redaction box covering the signature of Paul Butler.

PAUL BUTLER

Director

A black rectangular redaction box covering the contact information of Paul Butler.

Previous Representations

Local Plan,
City of York Council,
West Offices,
Station Rise,
York,
YO1 6GA

12th September 2016

Dear Sir or Madam,

CITY OF YORK LOCAL PLAN – LAND EAST OF METCALFE LANE – TW FIELDS – SUPPORT FOR SITE REFERENCE ST7

We write on behalf of our client TW Fields (TWF) to provide City of York Council (CYC) with further information in respect of the deliverability of their land interest at Land East of Metcalfe Lane which is currently proposed by CYC as a new Garden Village within the emerging City of York Local Plan. Our client fully **supports** the principle of the proposed allocation of the site by CYC as set out within the Preferred Sites Document (July 2016).

Site ST7 – Representations Summary

- We fully support the principle of the proposed allocation of the site by CYC
- The allocation boundary needs to be expanded in order to deliver a minimum of 975 homes at the site.
- The proposals will deliver a Sub-Urban Garden Village design philosophy with the provision of substantial community infrastructure including a primary school, village centre and public open space and recreational facilities.
- The net developable residential area of the proposed option is smaller than the current allocation site area prescribed by CYC.
- Vehicular access will be taken from Murton Way, Stockton Lane & Bad Bargain Lane. Preferential walking and cycling routes are provided throughout the site to deliver direct routes which are logical and well-integrated to encourage use. Bus penetration routes will be provided through the site also.
- The existing views and setting of York Minster, Millennium Way and Osbaldwick Conservation Area will be preserved and enhanced through a series of green corridors and retention of separation distances within the development masterplan. Including a large strategic greenspace located in the central area of the site in accordance with CYC's proposals.
- Ecological mitigation will be provided through the retention of existing features and also through compensatory provision for any loss of the existing SINC located within the site.
- The development proposals replicate the historical development patterns of the City in respect of the formation of a satellite settlement located on the periphery of the main urban edge.

Our proposals have the potential to provide for a new sub-urban Garden Village of 975 homes, alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space and recreational facilities. The site is strategically located to the east of the City, but importantly separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible. The development proposals are situated in a suitable and highly sustainable location in respect of connectivity to existing jobs and services and there are no technical or environmental (built and natural) constraints that would preclude the development of the site.

This letter sets out our client's design philosophy for the proposed development of a Sub-Urban Garden Village at the site and demonstrates the site's deliverability for residential development in accordance with national planning guidance. In doing so the letter refers to the following document which is enclosed: -

- Indicative Masterplan – PRA Architects – August 2016

In addition, the representations provide the key conclusions of a number of technical assessments associated with the development proposals. The assessments which are referenced below provide an update of the comprehensive technical reports which were previously submitted to CYC in the promotion of the larger site area. The parameters established within the comprehensive technical reports were utilised in the preparation of the new indicative masterplan for the site. Full versions of each of the above listed reports are of course available on request.

PROPOSED DEVELOPMENT

The proposed development has been formulated following the undertaking of ecology, landscape, Green Belt, flood risk, archaeology and highways assessments. The proposals seek to deliver a Sub-Urban Garden Village development of up to 975 new homes, community facilities and substantial areas of recreation and amenity areas. The vision of the proposals is to deliver a landscape led development which seeks to preserve and enhance the green framework of the site and its surroundings.

CYC Development Parameters

CYC's Preferred Sites Consultation Document identifies the following parameters associated with the proposed development of the site: -

1. *Site Size/Developable Area – 35.4Ha*
2. *Indicative Site Capacity – 845 homes (805 within plan period)*
3. *Archetype/Density – Strategic Site – 70% net site area at 35dph*
4. *Proposed Allocation – Allocated for residential development for 845 dwellings*
5. *Planning Principles: -*
 - a. *Deliver a sustainable housing mix in accordance with CYC's most up to date housing needs evidence.*
 - b. *Creation of a new 'garden' village that reflects the existing urban form of York.*
 - c. *Create a Local Centre incorporating appropriate shops, services and community facilities.*
 - d. *Education and community provision should be made early in the scheme's phasing, in order to allow the establishment of a new sustainable community.*
 - e. *A new primary facility and secondary provision (potentially in combination with Site ST8 – North of Monks Cross) may be required to serve the development as there is limited capacity available in existing schools. Further detailed assessments and associated viability work will be required.*
 - f. *Provide access either from Stockton Lane and/or Murton Way (via Outgang Lane), with a small proportion of development traffic potentially served off Bad Bargain lane. Access between Stockton Lane and Murton Way will be limited to public transport and walking/ cycling links only.*
 - g. *Deliver high quality, frequent and accessible public transport services through the whole site, to provide attractive links to York City Centre.*
 - h. *Public transport links through the adjacent site urban area will be sought, as well as public transport upgrades to either the Derwent Valley Light Rail Sustrans route, or bus priority measures on Hull Rd and/or Stockton lane, subject to feasibility and viability.*
 - i. *Optimise pedestrian and cycle integration, connection and accessibility in and out of the site and connectivity to the City and surrounding area.*
 - j. *Create strategic greenspace to protect the setting of the Millennium Way that runs through the site.*
 - k. *Minimise impacts of access from Murton Way to the South on SINC site 57 'Osbalwick Meadows'.*
 - l. *There are important views of the Minster from this part of the city particularly along Bad Bargain Lane further to the east of this site.*

CYC Planning Parameters Comparison with TWF Development Option

The table below provides a comparison of CYC’s identified aspirations for the site (outlined above) against the planning principles proposed by TWF’s proposed development option. Evidence to substantiate the inputs are set out in further detail below and within the enclosed documentation. Particular reference should be given to the enclosed Indicative Masterplan.

Ref.	CYC	TWF Option
1. Site Size	35.4Ha	43.53Ha
2. Site Capacity	845 Homes (805 Plan Period)	975 Homes (All within the plan period)
3. Density	Strategic Site – 70% net site area at 35dph	Sub-Urban Garden Village – 30.47 Ha net site area at 32dph
4. Allocation	845 Homes	975 Homes
CYC Planning Parameters		
5(a)	Sustainable Housing Mix	Site can deliver a variety of housing needs including first time buyers, detached family homes and homes for senior citizens.
5(b)	Garden Village	70% net developable area at 32dph will ensure the delivery of a Sub-Urban Garden Village located on the edge of an urban area.
5(c)	Local Centre	0.43Ha of land will be provided for a Local Centre which has the potential to provide a variety of facilities for prospective residents.
5(d)	Phasing of Community Facilities	The proposed community infrastructure and 10.31ha of public open space will be delivered commensurate with the progression of the development and made available for use as required.
5(e)	Primary/Secondary Education	1.91Ha of land for new Primary School buildings and playing fields are to be provided on site. An appropriate contribution will be delivered for secondary education. Discussions with Archbishop Holgate’s School have identified their desire and need for all of the potential new pupils from the development to attend the school to ensure its future viability.
5(f) & 5(g)	New Access Roads & Public Transport	Three access points are proposed from Stockton Lane (north), from Bad Bargain Lane (West) and from Murton Way (south). Each will be delivered to the standard needed to enable bus penetration through the site, connecting to existing settlement areas.
5(h)	Public Transport Upgrades	Existing pedestrian and cycle routes located within and adjacent to the site will be safeguarded and improved where required. Connection with existing bus routes will be enabled and infrastructure improved where required.
5(i)	Pedestrian & Cycle Connectivity	Existing pedestrian and cycle routes located within and adjacent to the site will be safeguarded and improved where required.
5(j)	Protect Millennium Way	The setting of Millennium Way will be preserved and enhanced through a series of green corridors proposed within the development masterplan. Including a large strategic greenspace located in the central area of the site in accordance with CYC’s proposals.
5(k)	Minimise Impact on SINC	Ecological mitigation will be provided through the retention of existing features and also through compensatory provision for any loss of the existing SINC located within the site.
5(l)	Safeguard views to York Minster	The existing views of York Minster will be retained and enhanced through a series of green corridors proposed within the development masterplan.

The comparison provided in the table above establishes that TWF’s development options will deliver CYC’s key planning parameters as set out within the Preferred Sites Document.

Though TWF support CYC’s proposed allocation of the site, the evidence presented in the table above and the enclosed documentation, clearly demonstrates that the allocation boundary/site area needs to be expanded in order to deliver 975 homes at the site. This is in association with the delivery of a Sub-Urban Garden Village design philosophy and the provision of substantial community infrastructure including a primary school, village centre and public open space and recreational facilities. Importantly,

the increase in land area would not have an impact on coalescence with the existing urban edge and surrounding settlements.

One further important factor that we would like to raise CYC's attention to is the net developable area proposed within the development options. CYC's proposed allocation amounts to **845 homes within 34.5ha** of land in total. It is our understanding that this area predominantly relates to the residential areas of the site, with the provision of public open space and recreational facilities being located within the central area of strategic greenspace and the site's edges, as proposed within the Preferred Options Document. We set out in the table above that the net developable area for our proposed development option is **975 homes within 30.47Ha** of land. An area lower than that prescribed by CYC. The gross areas of land associated with our client's development option is above CYC's 34.5ha figure, however, the additional land areas include a primary school, village centre, public open spaces and recreational facilities, including allotments. The increase in land area is entirely associated with the creation of a Sub-Urban Garden Village which benefits from substantial community infrastructure. Creating a new settlement where people will truly want to live.

TWF's development proposal represents a deliverable and viable development opportunity to provide a significant proportion of the City's housing needs. In addition to the benefits presented above, we believe it is also important that CYC places great weight towards the economic and social benefits that the delivery of 975 homes and the associated community infrastructure can provide to the City of York:

- Creating sustainable communities through meeting market and affordable housing needs, offering existing and potential residents of the City the opportunity to live in the type of house and location they desire.
- Delivering significant financial contributions towards the improvement of the City's infrastructure through the provision of S106/CIL payments.
- The development has the potential to deliver a new primary school. There will also be significant contributions available to support the local secondary school, Archbishop Holgate's School, as well as potential new pupils to ensure its future viability.
- New capital expenditure in the region of £117.5m creating substantial direct and indirect employment opportunities of approximately 334 new jobs of which 70% are usually retained in the local area.
- Sustaining and improving the District's labour market through delivering the right homes in the right locations.
- Increasing retail and leisure expenditure in the local area by between £23m per annum, creating a potential 141 jobs in these sectors.
- Provision of funding towards public services from an estimated figure of £8.95m from the Government's new homes bonus and annual council tax payments of £1.49m per annum.

It is unequivocal that the development of 975 homes at the site as part of a new Sub-Urban Garden Village can deliver substantial economic, social and environmental benefits to the local area and wider City.

The National Planning Policy Framework seeks to encourage sustainable growth and identifies in Paragraph 8 that economic growth, such as that which this site can deliver, can secure higher social and environmental standards. Furthermore, Paragraph 52 identifies that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements that follow the principles of Garden Cities (or a Sub-Urban Garden Village in this case).

Paragraph 52 of the Framework further states that in such circumstances local planning authorities should consider opportunities to provide the best way of achieving sustainable development. The remaining sections of this letter consider the economic, social and environmental impact and benefits of the proposed development option in further detail.

A NEW SUB-URBAN GARDEN VILLAGE – PRESERVING THE CHARACTER AND SETTING OF YORK

The proposal will provide for a new landscape led Sub-Urban Garden Village development for the City of York of 975 new homes. The site is located on the eastern boundary of the City adjacent to the Heworth, Tang Hall, Burnholme and Osbaldwick areas. Homes on the site will be designed and delivered within a comprehensive masterplan which will ensure that they respect the character of the surrounding area whilst seeking to incorporate 21st century designs to provide a development of its own unique character within a Green Framework. The proposals will contain design guides which will help to create a new exemplary Sub-Urban Garden Village for York.

The enclosed Indicative Masterplan prepared by PRA identifies the site's potential to deliver the following: -

- By undertaking a landscape led masterplan, development parcels have naturally been developed.
- Existing landscape features, including hedges and trees are retained within the site and can be further enhanced through additional planting within the built form.
- Adequate access can be achieved to the site for pedestrians, cyclists and vehicles, providing easy access to public transport and services which exist within the locality. Vehicular access will be taken from Murton Way, Stockton Lane & Bad Bargain Lane. Preferential walking and cycling routes are provided throughout the site to deliver direct routes which are logical and well-integrated to encourage use. Bus penetration routes will be provided through the site also.
- The existing views and setting of York Minster, Millennium Way and Osbaldwick Conservation Area are an important natural/built resource that have been preserved and enhanced through a series of green corridors and retention of separation distances within the development masterplan. Including a large strategic greenspace located in the central area of the site in accordance with CYC's proposals.
- Whilst the site comprises open land, its boundaries will be clearly well-defined, robust and enduring and have the ability to contain development within a framework of settlement, vegetation cover and landform.
- Sustainable drainage systems minimising surface water run-off will be delivered. The proposed drainage ponds will also provide ecological benefits.
- 10.31ha of public open space is distributed evenly throughout the site allowing easy access for all future residents of the development.
- Amenity space which has been carefully considered in terms of its position both in relation to its accessibility and usability and also in respect of its visual impact and sensitivity to its surroundings.
- Ecological mitigation will be provided through the retention of existing features and also through compensatory provision for any loss of the existing SINC located within the site.
- The development parcels, although secondary in their positioning within the site, will provide approximately 975 dwellings in a high quality environment sitting harmoniously within wider landscape setting.

The site was identified by the Council because it is not located in an area of "Primary Constraint" and does not compromise York's future Green Belt proposals. The development has been master-planned so that it will have minimum impact on the historic character and setting of the City. As stated above, the existing views and setting of York Minster, Millennium Way and Osbaldwick Conservation Area will be preserved and enhanced through a series of green corridors and retention of existing separation distances from present residential areas.

The development proposals replicate the historical development patterns of the City in respect of the formation of a satellite settlement located on the periphery of the main urban edge.

H2 Landscape Planning Partnership, previously undertook a Landscape & Visual Impact Assessment of the site in association with the previously proposed larger housing allocation. This work was previously submitted to CYC. They have assessed the amended proposals for the site and have concluded that the current masterplan is fully in accordance with their previously identified Landscape and Visual Impact recommendations.

On account of the above we agree with CYC's conclusion that the site does not fulfil any of the five Green Belt purposes for the following reasons: -

- **The development of the site would not result in unrestricted urban sprawl** due to the masterplan vision of delivering a landscape led scheme that delivers new strong defensible landscape boundaries and the provision of greenspace on the site's boundaries providing large separation distances between the development and existing residential areas.
- **The development of the site would not result in the merging of adjacent settlements** as the nearest detached settlements to the site are Murton to the east and Stockton on the Forrest to the north east, and the proposed landscape boundaries and the A64 Ring Road will ensure coalescence is prevented.
- **The site does not assist in safeguarding the countryside from encroachment** on account of the significant areas of open countryside that exist to the east of the site both within the A64 Ring Road's limits and beyond.
- **The proposed development of the site will have no detrimental effect on the setting and special character of historic features** as an assessment has been undertaken of the historic setting of York Minster and Osbaldwick Conservation Area and the masterplan has been designed to preserve and where possible enhance the heritage assets within proximity of the site.
- The fifth purpose of Green Belt **to assist in urban regeneration, by encouraging the recycling of derelict and other urban land** is a general purpose which will not be adversely affected by the site.

SAFEGUARDING HISTORIC CHARACTER

BWB Consulting have undertaken an assessment of the archaeology and built heritage of the site.

In respect of archaeology, this assessment has ascertained that to the north of Bad Bargain Lane is evidence of Roman settlement, occupation and industrial activity. This evidence takes the form of kilns that were used for the manufacture of pottery and tiles, with the presence of the production sites being suggestive of settlement. This has been substantiated by the presence of a Roman road that crosses the area to the north of Apple Tree Farm and links York with the fort situated at Stamford Bridge.

A sample geophysical survey was undertaken to provide further information on the archaeology but to also determine if the site was conducive to this evaluation method. The results determined the presence of a Roman road and possible settlement activity either side of this. Other features were identified which may relate to those previously identified.

Further detailed assessment and evaluation will be undertaken to further determine the extent of the Roman and earlier archaeology within the site. This will facilitate the detailed design of the future development proposals to either allow for preservation in situ (where feasible) and preservation by record.

There is evidence to indicate that the site was farmed in the medieval period, principally from surviving ridge and furrow earthworks. The area was also farmed in the post-medieval period, seen from the array of field boundaries that were created during the enclosure of the landscape. The most prominent earthworks lie in the southwestern extent and are likely to relate to the field systems associated with the medieval settlement of Osbaldwick, which is situated immediately to the south. Some of the earthworks are also likely to be associated with the medieval moated manor located on the southwest side of Osbaldwick.

The fields containing the ridge and furrow and those that make up the rest of the site do not form part of the four principal strays (including Monk Stray and Walmgate Stray), which lie some distance to the north and southwest of the site respectively. Equally the development will not impact these strays and it will not affect any green wedges that lead to the City due to the encroachment of housing estates to the west, which have obscured views in to the City.

There are opportunities for community engagement and outreach, both through direct involvement with archaeological work and through public lectures/press releases and publication. TWF would welcome further discussion with CYC to explore this potential.

With regards to built heritage, the prominence of the Minster and the corresponding low-lying surrounding landscape, allow far-reaching views which emphasise the strong identity of the city. As such, the City Council are keen to ensure that this dominance is protected within new development, alongside the ability to appreciate and understand the historic settlement of York itself. As identified above, future development within the site will take these aspects into consideration.

With regard to the tangibility of the historic City, the proposed development area has not been highlighted by the Council within their Historic Character and Setting Update (2013) or their earlier 2011 document as contributing to the City's historic character and setting. However, land adjacent to the development area to the east has been highlighted as an '*area preventing coalescence*' and an '*area retaining rural setting*'. Modern housing already forms a separation with the historic urban form to the west of the site and extension within this area would not remove the understanding of the historic form within the city. There is the potential for infringement upon the historic village of Osbaldwick, one of the city's historic satellite settlements; however, as can be seen from the enclosed indicative masterplan, this can be mitigated through the provision of the proposed substantial separation buffer.

With regard to views of York Minster, the development area does lie within one key long distance view and one key city-wide view, as defined in the York City Central Historic Core Conservation Area Appraisal. Both incorporate long-distance views of the Minster, within which the urban form already forms part of the backdrop. The enclosed indicative masterplan seeks to preserve these views through the provision of a series of green corridors and specifically through the delivery of the central strategic greenspace as desired by CYC. Furthermore, it is considered unlikely that low-level residential development will form a dominant feature of these views and will not interrupt any existing key views.

Accordingly, there are no heritage matters which would preclude the development of the site.

DELIVERING A SUSTAINABLE & ACCESSIBLE SETTLEMENT

The site is located in a highly sustainable area adjacent to the City of York.

The masterplan for the site includes the potential to provide shops and other necessary facilities within the development. Whilst the number of facilities and services of York City Centre will be made available by public transport connections and cycling, there is an abundance of services and facilities located within walking and cycling distance to the site in the settlement areas of Osbaldwick, Burnholme, Heworth and Tang Hall. There are a number of employment opportunities available at Osbaldwick Industrial Estate and Link Road Business Park to the south of the site. The site is located within proximity of the park and ride facilities at Grimston Bar. There are a number of existing primary and secondary schools located within walking and cycling distance of the development. The site is also located within walking and cycling distance of the York University Heslington East Campus.

Three access points are proposed from Stockton Lane (north), from Bad Bargain Lane (West) and from Murton Way (south). Each will be delivered to the standard needed to enable bus penetration through the site, connecting to existing settlement areas.

i-Transport have assessed the proposed access provision utilising the detailed work that they undertook in respect of the previously proposed larger housing allocation at the site (which was submitted to CYC). Their assessment has confirmed that although the size of the allocation has been reduced, it remains appropriate that three access opportunities are retained to serve the proposed development for the following reasons: -

- Traffic is spread between the access points, ensuring that the development is not constrained by capacity on the existing road network.
- Traffic from the site can leave the site at the junction closest to the destination and thus minimise traffic flows on the external road network. A road can be provided through the site which facilitates this but which does not encourage rat-running. Previous modelling work by CYC's consultants confirmed this.
- The three access points provide good and direct connections to the Strategic Road Network (SNR). This minimised the passage of traffic through established urban areas. Having two routes to the SNR, from Murton Way and Stockton Lane, will also minimise traffic impacts at junctions on the SNR on the York ring road.
- Trips around the City Centre will be minimised as traffic can approach destinations near the centre using the most appropriate radial route.
- The proposed allocation is not adjacent to the main road network and therefore the provision of three access points will minimise cul-de-sac lengths.
- Travel distances will be reduced, resulting in reduced emissions and environmental impacts.
- The provision of three access routes will facilitate a supporting bus strategy, with buses being able to use through routes, avoiding cul-de-sacs. North to South routes can also be facilitated.

Further to the above, i-Transport's overall assessment of the latest development proposals has confirmed that: -

- There are significant transport related opportunities, and few constraints, associated with the development of the site for residential uses;
- The site can be satisfactorily accessed and the access designs will accommodate traffic flows generated by the site. New access proposals include a re-alignment of Murton Way with Osbaldwick Link Road;
- The location of the site will allow opportunities for sustainable travel within York and for easy access to the main road network for car travel movements to longer distance destinations.
- Utilising two principle vehicular access points to the north & south of the site will ensure that the majority of new car travel from the development will circumnavigate existing settlement areas of the City; and
- A strategy can be developed to connect the site to existing facilities by bus, on foot and bicycle. This includes the provision of a new bus route and service through the site and upgrades to existing pedestrian and cycle paths where required.

The development of the site presents an opportunity to create modal shift and resultant sustainable travel patterns. Overall it is concluded that the site will be a suitable location for residential development.

SAFEGUARDING BIODIVERSITY

BWB Consulting have undertaken an assessment of the ecological value of the site. From a review of primary documents and an ecological walkover it has been determined that within the site there are a number of potential ecological constraints as summarised below: -

- Ground nesting birds and breeding birds across the site including boundary features such as hedges;
- Bats roosts within the mature trees within and surrounding the site;
- Amphibians including Great crested newts;
- SINC designations (Sites of Interest for Nature Conservation)

The first of these relating to birds is a standard constraint which affects most development sites and can be assessed and addressed by the use of appropriate seasonally specific surveys. The overall risk for taking the development forward due to this potential constraint is low. Appropriate bird surveys will be undertaken as part of any future planning application.

Bat surveys would be undertaken in two forms for a site of this size including transect survey and also an appraisal of bats in trees. Any required mitigation measures will then be identified and delivered as required.

An amphibians and reptile survey will be carried out as standard due to the habitats and ponds present within the site boundary but recent developments in eDNA testing may facilitate this for Great Crested Newt in particular. If a population is found to be present, then bottle trapping may be necessary. Again, any required mitigation measures will then be identified and delivered as required.

The main area of important habitat is the second tier wildlife site that lies in a strip of land to the south of the ponds and Bad Bargain Lane. It runs directly underneath the pylons and is a designated a Site of Interest for Nature Conservation or SINC. This area does not receive statutory protection in the same way as a Site of Special Scientific Interest (SSSI) and the citation of its reasons for designation is held by the Local Authority (LA). Appropriate measures including mitigation to compensate for the loss of any material attribute relating to ecology or biodiversity to the SINC will be considered as part of the assessment and survey of the SINC. Other measures including mitigation by design have also been considered, indeed the routing of the southern access point to the site has been re-aligned to ensure that it circumnavigates the SINC as much as possible. Due to land ownership constraints it is impossible to avoid the SINC altogether. However, it is proposed to provide significant levels of compensation for the proposed loss of area of SINC in the areas of land which surround it.

Accordingly, there are no biodiversity matters which would preclude the development of the site.

DELIVERING SUSTAINABLE DRAINAGE INFRASTRUCTURE

ID Civils have undertaken an up to date assessment of the development proposals against flood risk and drainage policy and guidance.

In respect of flood risk, a review against Environment Agency (EA) Flood Risk and Surface Water Flooding Plans has identified that the developable areas of the site are located within Flood Zone 1, which are areas with a low risk of flooding (1 in 1000 year or greater annual probability). The site has multiple points of access to the existing highway infrastructure and in the event of an extreme flood there is a safe emergency access point for all developed areas. Development will be set at a minimum level of 600mm above the EA modelled flood zone 3 levels and outside any Flood Zone 2 areas.

With regard to drainage matters, ID Civils confirm that a system of sustainable drainage will be developed to ensure that surface water run-off from developed areas does not exceed the current greenfield run-off rate from the site. A series of SUDS ponds/swales will be developed across the site in accordance with current guidance and EA advice to ensure that run-off is attenuated prior to being discharged to a watercourse. Attenuation will be designed to accommodate up to the 100-year storm event, plus a factor of 50% to account for climate change and urban creep across the development lifetime. The SUDS system will offer both run-off attenuation and improve water quality at the point of discharge.

The capacity of foul and combined sewers to cater for the new development will be provided by Yorkshire Waters powers under section 98 of the Water Act, following a detailed feasibility assessment of the load provided by the development and the existing network and treatment work capacity.

DELIVERY TIMESCALES

We envisage that a planning application will be submitted by Summer 2018, following the adoption of the Local Plan.

Taking into account the proposed submission date it is currently envisaged that first dwelling completions on the site will take place in 2019/20 following the submission of an outline planning application, subsequent reserved matters applications and initial site infrastructure works.

The potential size of the site offers the opportunity for three builders to develop the scheme simultaneously. Therefore, it is anticipated that the development will deliver a yield of at least 90 homes per annum with the potential to deliver up to 120 homes per annum (on account of being under 1,000 homes in size). The table below provides the site’s cumulative dwelling delivery projection per annum that CYC can use within their forthcoming housing trajectory work.

Year	TWF Development Option
2018/2019	0
2019/2020	45
2020/2021	135
2021/2022	225
2022/2023	315
2023/2024	405
2024/2025	495
2025/2026	585
2026/2027	675
2027/2028	765
2028/2029	855
2029/2030	945
2030/2031	975
2031/2032	
2032/2033	

The proposed community infrastructure and areas of public open space will be delivered commensurate with the progression of the development and made available for use as required.

The development proposals can deliver significant benefits to the City of York, alongside making a significant contribution to CYC’s housing requirements over the course of the plan period. In reference to CYC’s Preferred Sites consultation document it is prudent to identify that the site has the potential to deliver 975 homes over the anticipated plan period. Which is a greater contribution to the City’s housing needs to that currently identified by CYC.

DELIVERABILITY ASSESSMENT

In accordance with Footnote 11 of Paragraph 47 of the National Planning Policy Framework, we believe that the site can be considered as a **Deliverable** residential development site on account of: -

Suitability

The site is located in a suitable location for residential development now. As identified above, the development proposals are situated in a suitable and highly sustainable location in respect of connectivity to existing jobs and services and there are no technical or environmental (built and natural) constraints that would preclude the development of the site.

Availability

The site is available for development now. The site is available for residential development as there are no legal or ownership constraints as all landowners have made the land available for development. TWF have an interest in the site and by virtue of this and previous submissions are expressing an intention to develop the site for residential use.

Achievability

A viable housing development can be delivered on the site within the next five years and indeed within the first 5 years of the adoption of the Local Plan. TWF are seeking to develop the site for residential use. Prior to the progression of development sites, they undertake a thorough marketing and economic viability assessment for each site, including an assessment of any site specific abnormal costs. The site

is considered to be achievable for residential development now as there is a realistic prospect that the site can deliver new homes within the next 5 years and indeed within the first 5 years of the adoption of the Local Plan.

Deliverability Conclusion

The site can be considered a deliverable residential development site and its release would provide a number of significant economic, social and environmental benefits as identified above.

Furthermore, it is clear that the evidence provided within this letter and the enclosed documentation demonstrates that each of the factors raised within CYC's Interim Sustainability Appraisal (2016) will be responded to appropriately as follows: -

- The site will provide 975 homes which will be significantly positive for meeting the City's housing needs.
- The site has access to a number of existing facilities and transport routes and the proposals seek to enhance these connections.
- The lack of existing open space in the area will be rectified through the provision of 10.31ha of new publicly accessible open space.
- Archaeological evaluation of the site has taken place and the required mitigation techniques have been identified.
- Drainage and Flood Risk appraisals have taken place and through the use of SUDS techniques there is clear potential for the site to contribute to reductions in flood risk on and off site.
- The existing views and setting of York Minster, Millennium Way and Osbaldwick Conservation Area are an important natural/built resource that have been preserved and enhanced through a series of green corridors and retention of separation distances within the development masterplan. Including a large strategic greenspace located in the central area of the site in accordance with CYC's proposals.

CONCLUSIONS

On the basis of the information provided within this letter, and the enclosed documentation, we wish to place on record our **support** for the proposed allocation of Land to the East of Metcalfe Lane which is currently proposed by CYC as a new Sub-Urban garden village within the emerging City of York Local Plan.

Whilst we support the principles of the allocation of the site, we believe that amendments are required to the site's proposed boundaries in order to ensure that CYC's Garden Village philosophy for the site can be delivered alongside each of CYC's identified Planning Parameters.

Our proposals have the potential to provide a new Sub-Urban Garden Village of 975 homes, alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space and recreational facilities. The site is strategically located to the east of the City, but importantly separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible.

The development proposals are situated in a **suitable** and highly sustainable location and there are no technical or environmental (built and natural) constraints that would preclude the development of the site. The site is **available** now as it is under the control of a regional development company who are actively seeking to secure the site's allocation for residential development. The site can also be considered **achievable** as new homes can be delivered on the site within the next 5 years and indeed within the first five years of the Local Plan.

Finally, in respect of procedural matters, we would like to work alongside CYC to formulate a site specific strategic development policy to be included within future versions of the Local Plan. Working together we can ensure that CYC's and the local community's planning parameters for the site are deliverable.

Should you require any further details or clarification on the content of this letter please do not hesitate to contact me.

Yours sincerely,



PAUL BUTLER
Director



Local Plan,
 City of York Council,
 West Offices,
 Station Rise,
 York,
 YO1 6GA

27th October 2017

Dear Sir or Madam,

CITY OF YORK LOCAL PLAN – LAND EAST OF METCALFE LANE – TW FIELDS – SUPPORT FOR SITE REFERENCE ST7

We write on behalf of our client TW Fields (TWF) to provide City of York Council (CYC) with further information in respect of the deliverability of their land interest at Land East of Metcalfe Lane which is currently proposed by CYC as a new Garden Village within the emerging City of York Local Plan. Our client fully **supports** the principle of the proposed allocation of the site by CYC within the Pre-Publication Draft document (September 2017).

Site ST7 – Representations Summary
<ul style="list-style-type: none"> • We fully support the principle of the proposed allocation of the site by CYC • The allocation boundary needs to be expanded in order to deliver a minimum of 975 homes at the site. • Two deliverable and viable development proposals are being put forward for CYC’s consideration: <ul style="list-style-type: none"> ○ The delivery of 975 homes at the site alongside each of CYC’s proposed “Planning Principles”. ○ The delivery of 1,225 homes at the site to meet any potential increase in the City’s housing requirements, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC’s proposed “Planning Principles” for the site. • The proposals will deliver a Sub-Urban Garden Village design philosophy with the provision of substantial community infrastructure including a primary school, village centre and public open space, allotments and recreational facilities. • The net developable residential area of each of the proposed options are either smaller or similar in size to the current allocation site area prescribed by CYC. • Vehicular access will be taken from Murton Way, Stockton Lane & Bad Bargain Lane. Preferential walking and cycling routes are provided throughout the site to deliver direct routes which are logical and well-integrated to encourage use. Bus penetration routes will be provided through the site also. • The existing views and setting of York Minster, Millennium Way and Osbaldwick Conservation Area will be preserved and enhanced through a series of green corridors and retention of separation distances within the development masterplan. Including a large strategic greenspace located in the central area of the site in accordance with CYC’s proposals. • Ecological mitigation will be provided through the retention of existing features. The site previously contained a SINC, however, the ecological value of this area of the site has now been lost due to recent engineering works undertaken by Yorkshire Water. • The development proposals replicate the historical development patterns of the City in respect of the formation of a satellite settlement located on the periphery of the main urban edge.

Our proposals have the potential to provide for a new sub-urban Garden Village of either 975 homes or 1,225 homes, alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space, allotments and recreational facilities. The site is strategically located to the east of the City, but importantly separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible. The development proposals are situated in a suitable and highly sustainable

location in respect of connectivity to existing jobs and services and there are no technical or environmental (built and natural) constraints that would preclude the development of the site.

This letter sets out our client's design philosophy for the proposed development of a Sub-Urban Garden Village at the site and demonstrates the site's deliverability for residential development in accordance with national planning guidance. In doing so the letter refers to the following document which is enclosed: -

- Indicative Masterplan – Option 1 – PRA Architects – August 2016
- Indicative Masterplan – Option 2 – PRA Architects – October 2017

In addition, the representations provide the key conclusions of a number of technical assessments associated with the development proposals. The assessments which are referenced below provide an update of the comprehensive technical reports which were previously submitted to CYC in the promotion of the larger site area. The parameters established within the comprehensive technical reports were utilised in the preparation of the new indicative masterplan for the site. Full versions of each of the above listed reports are of course available on request.

With regards to our proposed Option 1, which recommends the delivery of 975 homes at the site, in order to meet an evidenced increase to the City's housing requirements, CYC's Officer's endorsed an increase in the proposed site allocation from 34.5ha (845 homes) to 44ha (975 homes) to CYC's Local Plan Working Group on the 10th July 2017. The reasoning behind the recommendation was as follows:

“This reflects developers/landowners concerns raised regarding the viability/deliverability of the site, the related ability to deliver the planning principles including provision of educational and community facilities and concerns over the provision of site access to the south of the site. Officers consider that this boundary amendment could improve the viability of the site and ensure that the planning principles can be delivered.”

Whilst CYC's Officer's recommendation wasn't accepted at the time, we believe there is still a strong case for the expansion of the site in respect of both size and housing numbers. As CYC's Officer's recommendation mirrors our proposed Option 1 in respect of size and number of homes, we fully support the previously proposed expansion of the site. These representations provide further evidence to substantiate CYC's Officer's recommendation, whilst also providing further evidence of the need to increase the size of the site in order to meet the increased housing needs of the City.

With regard to our proposed Option 2, the new 1,225 home opportunity for the development of the site is being put forward for CYC's consideration on account of the potential need for additional housing numbers on account of the Government's recent announcement associated with a standardised methodology for calculating annual housing requirements. The planning arguments associated with the newly proposed second option are discussed in further detail below.

The site was previously identified as strategic housing site allocation ST7 within the withdrawn City of York Publication Draft Local Plan (October 2014). At that time CYC proposed the delivery of 1,800 homes at the site. Whilst the two development options identified below relate to a figure lower than 1,800 homes, all the technical reports associated with the development of the site were originally undertaken in relation to the larger site area. Consequently, there remains the potential for the enlargement of the allocation back to the previously considered acceptable size, should CYC need to do so to meet the City's increased housing needs.

PROPOSED DEVELOPMENT

As identified above, there are two potential masterplan options associated with the development of the site: -

1. The delivery of 975 homes at the site. This masterplan option represents a deliverable and viable opportunity to deliver additional homes at the site, whilst also ensuring that each of CYC's proposed "Planning Principles" are delivered.
2. The delivery of 1,225 homes at the site to meet any potential increase in the City's housing requirements, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC's proposed "Planning Principles" for the site. This option could also deliver an increase in economic and social benefits associated with the delivery of more homes at the site.

The proposed development options have been formulated following the undertaking of ecology, landscape, Green Belt, flood risk, archaeology and highways assessments. The proposals seek to deliver a Sub-Urban Garden Village development, community facilities and substantial areas of recreation and amenity areas. The vision of the proposals is to deliver a landscape led development which seeks to preserve and enhance the green framework of the site and its surroundings.

CYC Development Parameters

CYC's Pre-Publication Draft Local Plan consultation document identifies the following parameters associated with the proposed development of the site: -

1. *Site Size/Developable Area – 35.4Ha*
2. *Indicative Site Capacity – 845 homes*
3. *Archetype/Density – Strategic Site – 70% net site area at 35dph*
4. *Planning Principles: -*
 - i. *Create a new 'garden' village that reflects the existing urban form of York of the main York urban area as a compact city surrounded by villages.*
 - ii. *Deliver a sustainable housing mix in accordance with the Council's most up to date Strategic Housing Market Assessment and affordable housing policy.*
 - iii. *Create a new local centre providing an appropriate range of shops, services and facilities to meet the needs of future occupiers of the development.*
 - iv. *Deliver education and community provision early in the scheme's phasing, in order to allow the establishment of a new sustainable community. A new primary facility and secondary provision (potentially in combination with Site ST8 – North of Monks Cross) may be required to serve the development as there is limited capacity available in existing schools. Further detailed assessments and associated viability work will be required.*
 - v. *Demonstrate that all transport issues have been addressed, in consultation with the Council as necessary, to ensure sustainable transport provision at the site is achievable. The impacts of the site individually and cumulatively with sites ST8, ST9, ST14 and ST15 should be addressed.*
 - vi. *Provide vehicular access from Stockton Lane to the north of the site and/or Murton Way to the south of the site (as shown on the proposals map), with a small proportion of public transport traffic potentially served off Bad Bargain lane. Access between Stockton Lane and Murton Way will be limited to public transport and walking/ cycling links only.*
 - vii. *Deliver high quality, frequent and accessible public transport services through the whole site, to provide attractive links to York City Centre. It is envisaged such measures will enable upwards of 15% of trips to be undertaken using public transport. Public transport links through the adjacent urban area will be sought, as well as public transport upgrades to either the Derwent Valley Light Rail Sustrans route, or bus priority measures on Hull Rd and/or Stockton lane, subject to feasibility and viability.*
 - viii. *Optimise pedestrian and cycle integration, connection and accessibility in and out of the site and connectivity to the city and surrounding area creating well-connected internal streets and walkable neighbourhoods, to encourage the maximum take-up of these more 'active' forms of transport (walking and cycling).*
 - ix. *Create new open space (as shown on the proposals map) to protect the setting of the Millennium Way that runs through the site. Millennium Way is a historic footpath which follows Bad Bargain Lane and is a footpath linking York's strays and should be kept open. A 50m*

green buffer has been included along the route of the Millennium Way that runs through the site to provide protection to this Public Right of Way and a suitable setting for the new development.

- x. Minimise impacts of access from Murton Way to the south on ‘Osboldwick Meadows’ Site of Importance for Nature Conservation and provide compensatory provision for any loss.
- xi. Preserve existing views to, and the setting of, York Minster, Millennium Way and Osboldwick Conservation Area.

CYC Planning Parameters Comparison with TWF Development Options

The table below provides a comparison of CYC’s identified aspirations for the site (outlined above) against the planning principles proposed by TWF’s proposed development options. Evidence to substantiate the inputs are set out in further detail below and within the enclosed documentation. Particular reference should be given to the enclosed Indicative Masterplans for each of the proposed development options.

Ref.	CYC	TWF Option 1	TWF Option 2
1. Site Size	35.4Ha	43.53Ha	57.27Ha
2. Site Capacity	845 Homes (All within the plan period)	975 Homes (All within the plan period)	1,225 Homes (All within the plan period)
3. Density	Strategic Site – 70% net site area at 35dph	Sub-Urban Garden Village – 30.47 Ha net site area at 32dph	Sub-Urban Garden Village – 40.1Ha net site area at 32dph
CYC Planning Parameters			
4(i)	Garden Village	Approximately 70% net developable area at 32dph will ensure the delivery of a Sub-Urban Garden Village located on the edge of an urban area.	Approximately 70% net developable area at 32dph will ensure the delivery of a Sub-Urban Garden Village located on the edge of an urban area.
4(ii)	Sustainable Housing Mix	Site can deliver a variety of housing needs including first time buyers, detached family homes, homes for senior citizens, build for rent and affordable housing.	Site can deliver a variety of housing needs including first time buyers, detached family homes, homes for senior citizens, build for rent and affordable housing. The site can also help to deliver additional homes should CYC’s annual housing requirement increase.
4(iii)	Local Centre	0.43Ha of land will be provided for a Local Centre which has the potential to provide a variety of facilities for prospective residents.	0.43Ha of land will be provided for a Local Centre which has the potential to provide a variety of facilities for prospective residents.
4(iv)	Phasing of Community Facilities & Primary/Secondary Education	The proposed community infrastructure and 10.31ha of public open space will be delivered commensurate with the progression of the development and made available for use as required. 0.59Ha of land for new Primary School buildings and 1.32ha of land adjacent for playing fields are to be provided on site (total 1.91ha). An appropriate contribution will be delivered for secondary education. Discussions with Archbishop Holgate’s School have identified their desire and need for all of the potential new pupils from the development to attend the school to ensure its future viability.	The proposed community infrastructure and 14.83ha of public open space will be delivered commensurate with the progression of the development and made available for use as required. 1.32Ha of land for new Primary School buildings and playing fields are to be provided on site. An appropriate contribution will be delivered for secondary education. Discussions with Archbishop Holgate’s School have identified their desire and need for all of the potential new pupils from the development to attend the school to ensure its future viability.

4(v)	Individual & Cumulative Transport Impact	TWF will work alongside CYC and other developers where necessary in order to ensure that the individual and cumulative highways impact on the City is mitigated. Detailed discussions have already taken place with CYC to agree the site-specific access solutions for the development proposals.	TWF will work alongside CYC and other developers where necessary in order to ensure that the individual and cumulative highways impact on the City is mitigated. Detailed discussions have already taken place with CYC to agree the site-specific access solutions for the development proposals.
4(vi)	New Access Roads & Public Transport	Three access points are proposed from Stockton Lane (north), from Bad Bargain Lane (West) and from Murton Way (south). Each will be delivered to the standard needed to enable bus penetration through the site, connecting to existing settlement areas. The northern and southern parcels of the site will be connected for bus penetration, pedestrian and cycle access only. An access is required from Bad Bargain Lane in order to ensure permeability and to enhance the site's ability to deliver new homes as early in the plan period as possible.	Three access points are proposed from Stockton Lane (north), from Bad Bargain Lane (West) and from Murton Way (south). Each will be delivered to the standard needed to enable bus penetration through the site, connecting to existing settlement areas. The northern and southern parcels of the site will be connected for bus penetration, pedestrian and cycle access only. An access is required from Bad Bargain Lane in order to ensure permeability and to enhance the site's ability to deliver new homes as early in the plan period as possible.
4(vii)	Public Transport Upgrades	The site's access points and internal spine roads will be delivered to the standard needed to enable bus penetration through the site, connecting to existing settlement areas. The northern and southern parcels of the site will be connected for bus penetration, pedestrian and cycle access only. Existing pedestrian and cycle routes located within and adjacent to the site will be safeguarded and improved where required. Connection with existing bus routes will be enabled and infrastructure improved where required.	The site's access points and internal spine roads will be delivered to the standard needed to enable bus penetration through the site, connecting to existing settlement areas. The northern and southern parcels of the site will be connected for bus penetration, pedestrian and cycle access only. Existing pedestrian and cycle routes located within and adjacent to the site will be safeguarded and improved where required. Connection with existing bus routes will be enabled and infrastructure improved where required.
4(viii)	Pedestrian & Cycle Connectivity	Existing pedestrian and cycle routes located within and adjacent to the site will be safeguarded and improved where required.	Existing pedestrian and cycle routes located within and adjacent to the site will be safeguarded and improved where required.
4(ix)	Protect Millennium Way	The setting of Millennium Way will be preserved and enhanced through a series of green corridors proposed within the development masterplan. Including a large strategic greenspace located in the central area of the site in accordance with CYC's proposals.	The setting of Millennium Way will be preserved and enhanced through a series of green corridors proposed within the development masterplan. Including a large strategic greenspace located in the central area of the site in accordance with CYC's proposals.

4(x)	Minimise Impact on SINC	Ecological mitigation will be provided through the retention of existing features. The site contained a SINC located close to the proposed southern access point, however, the ecological value of this area of the site has now been lost due to recent engineering works undertaken by Yorkshire Water.	Ecological mitigation will be provided through the retention of existing features. The site contained a SINC located close to the proposed southern access point, however, the ecological value of this area of the site has now been lost due to recent engineering works undertaken by Yorkshire Water.
4(xi)	Safeguard views to York Minster, Osbaldwick Conservation Area and Millennium Way	The existing views of York Minster and the setting of Millennium Way will be retained and enhanced through a series of green corridors proposed within the development masterplan. Alongside the green corridors, substantial areas of open space will be retained between the site's boundaries and existing settlement areas, including Osbaldwick Conservation Area.	The existing views of York Minster and the setting of Millennium Way will be retained and enhanced through a series of green corridors proposed within the development masterplan. Alongside the green corridors, substantial areas of open space will be retained between the site's boundaries and existing settlement areas, including Osbaldwick Conservation Area.

The comparison provided in the table above establishes that both of TWF's development options will deliver CYC's key planning parameters as set out within the Pre-Publication Draft Local Plan.

In particular, the requirements to deliver a sustainable housing mix could also include an element of Built to Rent (BTR) to help increase the supply in the Private Rented Sector (PRS) which has been identified by Government as a significant element of the national housing need. Following the Montague Review in 2012 there have been a significant number of Government initiatives on BTR and the House of Commons briefing paper (June 2017) stated that *"the PRS is viewed as an essential part of a strong housing market; successive Governments have tried to create and promote a more professional PRS that is more attractive to tenants, developers and investors"*. The PRS can provide flexibility of tenure, mobility and opportunities for employees, including the Key Worker section. With regards to the East of Metcalfe Lane, Osbaldwick site, the provision of BTR could complement the more traditional housebuilder product that will be delivered across the majority of the site.

Though TWF support CYC's proposed allocation of the site, the evidence presented in the table above and the enclosed documentation, clearly demonstrates that the allocation boundary/site area needs to be expanded in order to deliver 975 homes at the site. This is in association with the delivery of a Sub-Urban Garden Village design philosophy and the provision of substantial community infrastructure including a primary school, village centre and public open space, allotments and recreational facilities. Importantly, the increase in land area would not have an impact on coalescence with the existing urban edge and surrounding settlements. The site's areas of environmental value (natural and built) has also been carefully considered in the formulation of TWF's proposed Option 2 relating to 1,225 homes.

One further important factor that we would like to raise CYC's attention to is the net developable area proposed within each of the two above options. CYC's proposed allocation amounts to **845 homes within 35.4ha** of land in total. It is our understanding that this area predominantly relates to the residential areas of the site, with the provision of public open space, allotments and recreational facilities being located on the site's edges, as proposed within the Pre-Publication Draft Local Plan. We set out in the table above, and within the enclosed Indicative Masterplans for each of the two development options, that the net developable areas for the two proposed options are **975 homes within 30.47Ha** of land and **1,225 homes within 40.1Ha** of land. Both areas are of course lower or similar in size to that prescribed by CYC. The gross areas of land associated with both of our client's development options are above the current 35.4ha figure, however, the additional land areas include a primary school, nursery, village centre, public open spaces, allotments and recreational facilities. The increase

in land area is entirely associated with the creation of a Sub-Urban Garden Village which benefits from substantial community infrastructure. Creating a new settlement where people will truly want to live.

The similarities between both of TWF's development options are clear. Whilst both represent deliverable and viable development opportunities to deliver a significant proportion of the City's housing needs, the difference between the two is associated with the increase in proposed residential dwellings and, of course, the proportionate economic and social benefits associated with the delivery of more homes from the site. The two proposed development options at the site can deliver the following economic and social benefits to the City of York: -

- Creating sustainable communities through meeting market and affordable housing needs, offering existing and potential residents of the City the opportunity to live in the type of house and location they desire. Including the provision of between 292 affordable homes and 368 affordable homes.
- Delivering significant financial contributions towards the improvement of the City's infrastructure through the provision of S106/CIL payments.
- The development has the potential to deliver a new primary school. There will also be significant contributions available to support the local secondary school, Archbishop Holgate's School, as well as potential new pupils to ensure its future viability.
- New capital expenditure in the region of between £119.8m and £147.2m creating substantial direct and indirect employment opportunities of approximately 387 to 405 new jobs, including apprenticeships, of which 70% are usually retained in the local area.
- Sustaining and improving the District's labour market through delivering the right homes in the right locations.
- Increasing retail and leisure expenditure in the local area by between £22.8m and £28m per annum, creating a potential 133 to 164 jobs in these sectors.
- Provision of services included superfast broadband.
- Provision of funding towards public services from an estimated figure of between £8.56m and £10.5m from the Government's new homes bonus and annual council tax payments of £1.43m to £1.75m per annum.

It is unequivocal that the development of 975 homes or 1,225 homes at the site as part of a new Sub-Urban Garden Village can deliver substantial economic, social and environmental benefits to the local area and wider City.

The National Planning Policy Framework seeks to encourage sustainable growth and identifies in Paragraph 8 that economic growth, such as that which this site can deliver, can secure higher social and environmental standards. Furthermore, Paragraph 52 identifies that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements that follow the principles of Garden Cities (or a Sub-Urban Garden Village in this case).

Paragraph 52 of the Framework further states that in such circumstances local planning authorities should consider opportunities to provide the best way of achieving sustainable development. The remaining sections of this letter consider the economic, social and environmental impact and benefits of the proposed development option in further detail.

A NEW SUB-URBAN GARDEN VILLAGE – PRESERVING THE CHARACTER AND SETTING OF YORK

The proposal will provide for a new landscape led Sub-Urban Garden Village development for the City of York of either 975 or 1,225 new homes. The site is located on the eastern boundary of the City adjacent to the Heworth, Tang Hall, Burnholme and Osbaldwick areas. Homes on the site will be designed and delivered within a comprehensive masterplan which will ensure that they respect the character of the surrounding area whilst seeking to incorporate 21st century designs to provide a development of its own unique character within a Green Framework. The proposals will contain design guides which will help to create a new exemplary Sub-Urban Garden Village for York.

The two enclosed Indicative Masterplans prepared by PRA identifies the site's potential to deliver the following: -

- By undertaking a landscape led masterplan, development parcels have naturally been developed.
- Existing landscape features, including hedges and trees are retained within the site and can be further enhanced through additional planting within the built form.
- Adequate access can be achieved to the site for pedestrians, cyclists and vehicles, providing easy access to public transport and services which exist within the locality. Vehicular access will be taken from Murton Way, Stockton Lane & Bad Bargain Lane. Preferential walking and cycling routes are provided throughout the site to deliver direct routes which are logical and well-integrated to encourage use. Bus penetration routes will be provided through the site also.
- The existing views and setting of York Minster, Millennium Way and Osbaldwick Conservation Area are an important natural/built resource that have been preserved and enhanced through a series of green corridors and retention of separation distances within the development masterplan. Including a large strategic greenspace located in the central area of the site in accordance with CYC's proposals.
- Whilst the site comprises open land, its boundaries will be clearly well-defined, robust and enduring and have the ability to contain development within a framework of settlement, vegetation cover and landform.
- Sustainable drainage systems minimising surface water run-off will be delivered. The proposed drainage ponds will also provide ecological benefits.
- Up to 1.91Ha of land for new Primary School buildings and playing fields are to be provided on site.
- 10.31ha to 14.83ha of public open space is distributed evenly throughout the site allowing easy access for all future residents of the development.
- Amenity space which has been carefully considered in terms of its position both in relation to its accessibility and usability and also in respect of its visual impact and sensitivity to its surroundings.
- Ecological mitigation will be provided through the retention of existing features. The site previously contained a SINC located close to the proposed southern access point, however, the ecological value of this area of the site has now been lost due to recent engineering works undertaken by Yorkshire Water.
- The development parcels, although secondary in their positioning within the site, will provide between 975 and 1,225 homes in a high-quality environment sitting harmoniously within wider landscape setting.

The site was identified by the Council because it is not located in an area of "Primary Constraint" and does not compromise York's future Green Belt proposals. The development has been master-planned so that it will have minimum impact on the historic character and setting of the City. As stated above, the existing views and setting of York Minster, Millennium Way and Osbaldwick Conservation Area will be preserved and enhanced through a series of green corridors and retention of existing separation distances from present residential areas.

The development proposals replicate the historical development patterns of the City in respect of the formation of a satellite settlement located on the periphery of the main urban edge.

H2 Landscape Planning Partnership, previously undertook a Landscape & Visual Impact Assessment of the site in association with the previously proposed larger housing allocation. This work was previously submitted to CYC. They have assessed the amended proposals for the site and have concluded that the current masterplan is fully in accordance with their previously identified Landscape and Visual Impact recommendations.

On account of the above we agree with CYC's conclusion that the site does not fulfil any of the five Green Belt purposes for the following reasons: -

- ***The development of the site would not result in unrestricted urban sprawl*** due to the masterplan vision of delivering a landscape led scheme that delivers new strong defensible landscape boundaries and the provision of greenspace on the site's boundaries providing large separation distances between the development and existing residential areas.

- **The development of the site would not result in the merging of adjacent settlements** as the nearest detached settlements to the site are Murton to the east and Stockton on the Forrest to the north east, and the proposed landscape boundaries and the A64 Ring Road will ensure coalescence is prevented.
- **The site does not assist in safeguarding the countryside from encroachment** on account of the significant areas of open countryside that exist to the east of the site both within the A64 Ring Road's limits and beyond.
- **The proposed development of the site will have no detrimental effect on the setting and special character of historic features** as an assessment has been undertaken of the historic setting of York Minster and Osbaldwick Conservation Area and the masterplan has been designed to preserve and where possible enhance the heritage assets within proximity of the site.
- The fifth purpose of Green Belt **to assist in urban regeneration, by encouraging the recycling of derelict and other urban land** is a general purpose which will not be adversely affected by the site.

SAFEGUARDING HISTORIC CHARACTER

BWB Consulting have undertaken an assessment of the archaeology and built heritage of the site.

In respect of archaeology, this assessment has ascertained that to the north of Bad Bargain Lane is evidence of Roman settlement, occupation and industrial activity. This evidence takes the form of kilns that were used for the manufacture of pottery and tiles, with the presence of the production sites being suggestive of settlement. This has been substantiated by the presence of a Roman road that crosses the area to the north of Apple Tree Farm and links York with the fort situated at Stamford Bridge.

A sample geophysical survey was undertaken to provide further information on the archaeology but to also determine if the site was conducive to this evaluation method. The results determined the presence of a Roman road and possible settlement activity either side of this. Other features were identified which may relate to those previously identified.

Further detailed assessment and evaluation will be undertaken to further determine the extent of the Roman and earlier archaeology within the site. This will facilitate the detailed design of the future development proposals to either allow for preservation in situ (where feasible) and preservation by record.

There is evidence to indicate that the site was farmed in the medieval period, principally from surviving ridge and furrow earthworks. The area was also farmed in the post-medieval period, seen from the array of field boundaries that were created during the enclosure of the landscape. The most prominent earthworks lie in the southwestern extent and are likely to relate to the field systems associated with the medieval settlement of Osbaldwick, which is situated immediately to the south. Some of the earthworks are also likely to be associated with the medieval moated manor located on the southwest side of Osbaldwick.

The fields containing the ridge and furrow and those that make up the rest of the site do not form part of the four principal strays (including Monk Stray and Walmgate Stray), which lie some distance to the north and southwest of the site respectively. Equally the development will not impact these strays and it will not affect any green wedges that lead to the City due to the encroachment of housing estates to the west, which have obscured views in to the City.

There are opportunities for community engagement and outreach, both through direct involvement with archaeological work and through public lectures/press releases and publication. TWF would welcome further discussion with CYC to explore this potential.

With regards to built heritage, the prominence of the Minster and the corresponding low-lying surrounding landscape, allow far-reaching views which emphasise the strong identity of the city. As such, the City Council are keen to ensure that this dominance is protected within new development,

alongside the ability to appreciate and understand the historic settlement of York itself. As identified above, future development within the site will take these aspects into consideration.

With regard to the tangibility of the historic City, the proposed development area has not been highlighted by the Council within their Historic Character and Setting Update (2013) or their earlier 2011 document as contributing to the City's historic character and setting. However, land adjacent to the development area to the east has been highlighted as an '*area preventing coalescence*' and an '*area retaining rural setting*'. Modern housing already forms a separation with the historic urban form to the west of the site and extension within this area would not remove the understanding of the historic form within the city. There is the potential for infringement upon the historic village of Osbaldwick, one of the city's historic satellite settlements; however, as can be seen from the two enclosed indicative masterplans, this can be mitigated through the provision of the proposed substantial separation buffer.

With regard to views of York Minster, the development area does lie within one key long distance view and one key city-wide view, as defined in the York City Central Historic Core Conservation Area Appraisal. Both incorporate long-distance views of the Minster, within which the urban form already forms part of the backdrop. The two enclosed indicative masterplans seek to preserve these views through the provision of a series of green corridors and specifically through the delivery of the central strategic greenspace as desired by CYC. Furthermore, it is considered unlikely that low-level residential development will form a dominant feature of these views and will not interrupt any existing key views.

Accordingly, there are no heritage matters which would preclude either of the two development options proposed at the site.

DELIVERING A SUSTAINABLE & ACCESSIBLE SETTLEMENT

The site is located in a highly sustainable area adjacent to the City of York.

The two indicative masterplan options for the site include the potential to provide shops and other necessary facilities within the development. Whilst the number of facilities and services of York City Centre will be made available by public transport connections and cycling, there is an abundance of services and facilities located within walking and cycling distance to the site in the settlement areas of Osbaldwick, Burnholme, Heworth and Tang Hall. There are a number of employment opportunities available at Osbaldwick Industrial Estate and Link Road Business Park to the south of the site. The site is located within proximity of the park and ride facilities at Grimston Bar. There are a number of existing primary and secondary schools located within walking and cycling distance of the development. The site is also located within walking and cycling distance of the York University Heslington East Campus.

Three access points are proposed from Stockton Lane (north), from Bad Bargain Lane (West) and from Murton Way (south). Each will be delivered to the standard needed to enable bus penetration through the site, connecting to existing settlement areas.

i-Transport have assessed the proposed access provision utilising the detailed work that they undertook in respect of the previously proposed larger housing allocation at the site (which was submitted to CYC). Their assessment has confirmed that although the size of the allocation has been reduced, it remains appropriate that three access opportunities are retained to serve the proposed development for the following reasons: -

- Traffic is spread between the access points, ensuring that the development is not constraints by capacity on the existing road network.
- Traffic from the site can leave the site at the junction closest to the destination and thus minimise traffic flows on the external road network. A road can be provided through the site which facilitates this but which does not encourage rat-running. Previous modelling work by CYC's consultants confirmed this.
- The three access points provide good and direct connections to the Strategic Road Network (SNR). This minimised the passage of traffic through established urban areas. Having two routes to the

SNR, from Murton Way and Stockton Lane, will also minimise traffic impacts at junctions on the SNR on the York ring road.

- Trips around the City Centre will be minimised as traffic can approach destinations near the centre using the most appropriate radial route.
- The proposed allocation is not adjacent to the main road network and therefore the provision of three access points will minimise cul-de-sac lengths.
- Travel distances will be reduced, resulting in reduced emissions and environmental impacts.
- The provision of three access routes will facilitate a supporting bus strategy, with buses being able to use through routes, avoiding cul-de-sacs. North to South routes can also be facilitated.

Further to the above, i-Transport's overall assessment of the latest development proposals has confirmed that: -

- There are significant transport related opportunities, and few constraints, associated with the development of the site for residential uses;
- The site can be satisfactorily accessed and the access designs will accommodate traffic flows generated by the site. New access proposals include a re-alignment of Murton Way with Osbaldwick Link Road;
- The location of the site will allow opportunities for sustainable travel within York and for easy access to the main road network for car travel movements to longer distance destinations.
- Utilising two principle vehicular access points to the north & south of the site will ensure that the majority of new car travel from the development will circumnavigate existing settlement areas of the City; and
- A strategy can be developed to connect the site to existing facilities by bus, on foot and bicycle. This includes the provision of a new bus route and service through the site and upgrades to existing pedestrian and cycle paths where required. The proposals will also encourage green transport options in the form of car sharing and vehicle charging points.

The development of the site presents an opportunity to create modal shift and resultant sustainable travel patterns. Overall it is concluded that the site will be a suitable location for residential development.

SAFEGUARDING BIODIVERSITY

BWB Consulting have undertaken an assessment of the ecological value of the site. From a review of primary documents and an ecological walkover it has been determined that within the site there are a number of potential ecological constraints as summarised below: -

- Ground nesting birds and breeding birds across the site including boundary features such as hedges;
- Bats roosts within the mature trees within and surrounding the site;
- Amphibians including Great crested newts;
- SINCS designations (Sites of Interest for Nature Conservation)

The first of these relating to birds is a standard constraint which affects most development sites and can be assessed and addressed by the use of appropriate seasonally specific surveys. The overall risk for taking the development forward due to this potential constraint is low. Appropriate bird surveys will be undertaken as part of any future planning application.

Bat surveys would be undertaken in two forms for a site of this size including transect survey and also an appraisal of bats in trees. Any required mitigation measures will then be identified and delivered as required.

An amphibians and reptile survey will be carried out as standard due to the habitats and ponds present within the site boundary but recent developments in eDNA testing may facilitate this for Great Crested Newt in particular. If a population is found to be present, then bottle trapping may be necessary. Again, any required mitigation measures will then be identified and delivered as required.

The main area of important habitat is the second tier wildlife site that lies in a strip of land to the south of the ponds and Bad Bargain Lane. It runs directly underneath the pylons and is designated a Site of Interest for Nature Conservation or SINC. This area does not receive statutory protection in the same way as a Site of Special Scientific Interest (SSSI) and the citation of its reasons for designation is held by the Local Authority (LA). Whilst this area of the site is currently designated as a SINC, it is our understanding that any value that it had has now been removed on account of recent engineering works undertaken by Yorkshire Water. The site's remaining value will be re-assessed. Due to land ownership constraints it is impossible to avoid this area of the site altogether. However, should any ecological value remain, it is proposed to provide significant levels of compensation for the proposed loss of area in the areas of land which surround it.

Accordingly, there are no biodiversity matters which would preclude either of the two development options proposed at the site.

DELIVERING SUSTAINABLE DRAINAGE INFRASTRUCTURE

ID Civils have undertaken an up to date assessment of the development proposals against flood risk and drainage policy and guidance.

In respect of flood risk, a review against Environment Agency (EA) Flood Risk and Surface Water Flooding Plans has identified that the developable areas of the site are located within Flood Zone 1, which are areas with a low risk of flooding (1 in 1000 year or greater annual probability). The site has multiple points of access to the existing highway infrastructure and in the event of an extreme flood there is a safe emergency access point for all developed areas. Development will be set at a minimum level of 600mm above the EA modelled flood zone 3 levels and outside any Flood Zone 2 areas.

With regard to drainage matters, ID Civils confirm that a system of sustainable drainage will be developed to ensure that surface water run-off from developed areas does not exceed the current greenfield run-off rate from the site. A series of SUDS ponds/swales will be developed across the site in accordance with current guidance and EA advice to ensure that run-off is attenuated prior to being discharged to a watercourse. Attenuation will be designed to accommodate up to the 100-year storm event, plus a factor of 50% to account for climate change and urban creep across the development lifetime. The SUDS system will offer both run-off attenuation and improve water quality at the point of discharge.

The capacity of foul and combined sewers to cater for the new development will be provided by Yorkshire Waters powers under section 98 of the Water Act, following a detailed feasibility assessment of the load provided by the development and the existing network and treatment work capacity.

MEETING THE CITY OF YORK'S FUTURE HOUSING NEEDS

As identified above, we believe that there is a case for the identification of additional housing allocations to those currently proposed by CYC in order to meet the City's housing needs over the proposed plan period.

At present the Council have decided to progress with a housing target which is based solely on the baseline figure which is derived from the ONS 2014-based sub-national household projections and does not include the 10% uplift for market signals which is advised within the Council's latest SHMA.

By omitting the 10% uplift, and not progressing with a housing requirement of 953 dwellings per annum, the Council are failing to meet their full OAN, as required by the Framework and the Planning Practice Guidance (PPG). There are considered to be no overarching constraints within the District that justify the Council not delivering their full OAN. This approach fails to meet any of the tests of soundness set out in paragraph 182 of the Framework as the Local Plan is not positively prepared; justified; effective and consistent with national policy.

No evidence has been provided by the Council to justify the removal of the SHMA's proposed 10% uplift for market signals and it is assumed that this has been viewed as a way of reducing the overall housing target.

The Government's recent consultation document "*Planning for the Right Homes in the Right Places*" (September 2017) identifies a proposed standardised methodology for the calculation of the baseline OAN for each of the Country's Local Authority areas. Importantly, the guidance identifies in Table 1 on Page 22 of the document that in the circumstance when a Local Authority's Local Plan has not progressed to the submission of the Local Plan by the 31st March 2018 then the proposed standardised methodology should be utilised.

The Government's proposed standardised methodology includes for an uplift for market signals over and above the baseline figure and in the specific case of York, would lead to a housing requirement of 1,070 dwellings per annum. Although the methodology is subject to consultation and therefore carries limited weight at this time, it provides an indication as to how the Government considers housing requirements should be calculated, and the consideration of market signals is a key issue.

The Council are now in a position where their own evidence and the Government's proposed standardised methodology, all state that an uplift for market signals should be added to the baseline figure, and all of which indicate that the true full OAN is greater than the 867 dwellings per annum which is being proposed.

Therefore, in order to make the plan sound, the housing figure should be adjusted upwards to consider market signals.

In conclusion, there is a compelling case for the release of additional land as housing allocations within the emerging CYC Local Plan in order to meet the City's full objectively assessed housing needs, such as an extension of our client's Land East of Metcalfe Lane, Osbaldwick site to deliver an increased total of 1,225 new homes.

DELIVERY TIMESCALES

We envisage that a planning application will be submitted in 2019, following the adoption of the Local Plan.

Taking into account the proposed submission date it is currently envisaged that first dwelling completions on the site will take place in 2019/20 following the submission of a hybrid planning application and initial site infrastructure works.

The potential size of the site offers the opportunity for three builders to develop the scheme simultaneously. Therefore, it is anticipated that the development will deliver a yield of at least 90 homes per annum with the potential to deliver up to 120 homes per annum. Whilst our Option 2 relates to a development of over 1,000 homes (meaning up to four developers could potentially develop the scheme simultaneously) taking into account the potential developers of this site, in this instance it is considered sensible to base the delivery trajectory of the site of three builders delivering at least 90 homes per annum.

The table below provides the site's cumulative dwelling delivery projection per annum that CYC can use within their forthcoming housing trajectory work.

Year	TWF Development Option 1	TWF Development Option 2
2018/2019	0	0
2019/2020	45	45
2020/2021	135	135
2021/2022	225	225
2022/2023	315	315
2023/2024	405	405
2024/2025	495	495
2025/2026	585	585
2026/2027	675	675
2027/2028	765	765
2028/2029	855	855
2029/2030	945	945
2030/2031	975	1,035
2031/2032		1,125
2032/2033		1,225

The proposed community infrastructure and areas of public open space will be delivered commensurate with the progression of the development and made available for use as required.

The development proposals can deliver significant benefits to the City of York, alongside making a significant contribution to CYC’s housing requirements over the course of the plan period. In reference to CYC’s Pre-Publication Draft consultation document it is prudent to identify that the site has the potential to deliver 975 to 1,225 homes within the anticipated plan period. Which is a greater contribution to the City’s housing needs to that currently identified by CYC.

DELIVERABILITY ASSESSMENT

In accordance with Footnote 11 of Paragraph 47 of the National Planning Policy Framework, we believe that the site can be considered as a **Deliverable** residential development site on account of: -

Suitability

The site is located in a suitable location for residential development now. As identified above, the development proposals are situated in a suitable and highly sustainable location in respect of connectivity to existing jobs and services and there are no technical or environmental (built and natural) constraints that would preclude the development of the site.

Availability

The site is available for development now. The site is available for residential development as there are no legal or ownership constraints as all landowners have made the land available for development. TWF have an interest in the site and by virtue of this and previous submissions are expressing an intention to develop the site for residential use.

Achievability

A viable housing development can be delivered on the site within the next five years and indeed within the first 5 years of the adoption of the Local Plan. TWF are seeking to develop the site for residential use. Prior to the progression of development sites, they undertake a thorough marketing and economic viability assessment for each site, including an assessment of any site specific abnormal costs. The site is considered to be achievable for residential development now as there is a realistic prospect that the site can deliver new homes within the next 5 years and indeed within the first 5 years of the adoption of the Local Plan.

Deliverability Conclusion

The site can be considered a deliverable residential development site and its release would provide a number of significant economic, social and environmental benefits as identified above.

CONCLUSIONS

On the basis of the information provided within this letter, and the enclosed documentation, we wish to place on record our **support** for the proposed allocation of Land to the East of Metcalfe Lane which is currently proposed by CYC as a new Sub-Urban Garden Village within the emerging City of York Local Plan.

Whilst we support the principles of the allocation of the site, we believe that amendments are required to the site's proposed boundaries in order to ensure that CYC's Garden Village philosophy for the site can be delivered alongside each of CYC's identified Planning Parameters.

Our proposals have the potential to provide a new Sub-Urban Garden Village of either 975 homes or 1,225 homes, alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space, allotments and recreational facilities. The site is strategically located to the east of the City, but importantly separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible.

The development proposals are situated in a **suitable** and highly sustainable location and there are no technical or environmental (built and natural) constraints that would preclude the development of the site. The site is **available** now as it is under the control of a regional development company who are actively seeking to secure the site's allocation for residential development. The site can also be considered **achievable** as new homes can be delivered on the site within the next 5 years and indeed within the first five years of the Local Plan.

Finally, in respect of procedural matters, we would like to work alongside CYC to finalise the site specific strategic development policy to be included within future versions of the Local Plan. Working together we can ensure that CYC's and the local community's planning parameters for the site are deliverable.

Should you require any further details or clarification on the content of this letter please do not hesitate to contact me.

Yours sincerely,

A black rectangular box redacting the signature of Paul Butler.

PAUL BUTLER

Director

A black rectangular box redacting contact information, likely a phone number or email address.

Local Plan,
City of York Council,
West Offices,
Station Rise,
York, YO1 6GA

4th April 2018

Dear Sir or Madam,

CITY OF YORK LOCAL PLAN – LAND EAST OF METCALFE LANE – TW FIELDS – SUPPORT FOR SITE REFERENCE ST7

We write on behalf of our client TW Fields (TWF) to provide City of York Council (CYC) with their representations to CYC's Publication Draft Local Plan (February 2018).

From a review of the latest version of the Local Plan, it is clear that CYC have not taken on board the evidence we previously presented in our representations to earlier versions of the Local Plan, by letters dated 12th September 2016 and 27th October 2017. As a result, we are concerned that the current Publication Draft Local Plan cannot be considered sound in the context of Paragraph 182 of the NPPF.

This letter does not seek to re-iterate the comments made to CYC in our previously submitted representations. These are enclosed, and we request that they are submitted alongside this letter to the Secretary of State as a holistic comprehensive representation for the Land to the East of Metcalfe Lane site.

This letter will however provide a summary of the comments previously made, before providing updates in our response to CYC's evidence base in association with the deliverability of this site and the objectively assessed housing needs of the City.

Our client's **support** CYC's identification of the site as a new Garden Village within the emerging City of York Local Plan.

However, whilst the site can deliver 845 homes within the plan period within CYC's current site red line site allocation boundary, it is our view that the current boundary should be expanded in order to enhance the community and green infrastructure that the site can deliver in respect of the policy aspirations required by Policy SS9 of the Publication Draft Local Plan.

Furthermore, a key matter that CYC need to consider in respect of the need to expand the current red line site allocation boundary for the site, is the requirement to deliver a southern access to Osbaldwick Link Road. Extending the boundary as requested by these and previous representations will ensure that this requested access (as stipulated by Policy SS9) can be delivered without any landownership issues.

We understand that one of CYC's concerns associated with the potential increase of the red line allocation site boundary is the knock-on impact of an increase in the number of homes to be delivered at the site. Consequently, within these representations we provide an additional option which, whilst retaining our proposed minimum allocation boundary, will provide the number of homes desired at the site by CYC and also increase the amount of land provided for community and green infrastructure.

We therefore request that CYC amend the red line allocation boundary prior to the submission of the Local Plan to the Secretary of State in order to ensure that the Local Plan can be found sound. From a delivery point of view, this will also allow us to prepare and submit a planning application prior to the adoption of the Local Plan, which could then be determined shortly after the Local Plan's adoption. Thus, ensuring the delivery of new homes from the site at the earliest point possible.

LAND EAST OF METCALFE LANE, OSBALDWICK – SUMMARY & DEVELOPMENT OPTIONS

A summary of our previous representations is provided in the table below: -

Site ST7 – Representations Summary
<ul style="list-style-type: none"> • We fully support the principle of the proposed allocation of the site by CYC • Three deliverable and viable development proposals are being put forward for CYC’s consideration: <ul style="list-style-type: none"> ○ The delivery of 845 homes (including up to 253 affordable homes) at the site alongside each of CYC’s proposed “Planning Principles” with additional areas of recreational open space and landscaping. ○ The delivery of 975 homes (including up to 292 affordable homes) at the site alongside each of CYC’s proposed “Planning Principles”. ○ The delivery of 1,225 homes (including up to 368 affordable homes) at the site to meet any potential increase in the City’s housing requirements, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC’s proposed “Planning Principles” for the site. • The development proposals can deliver 315 homes within the first 5 years of the Local Plan and up to 1,225 homes within the plan period. • The proposals will deliver a Sub-Urban Garden Village design philosophy with the provision of substantial community infrastructure including a primary school, village centre and public open space, allotments and recreational facilities. • The net developable residential area of each of the proposed options are either smaller or similar in size to the current allocation site area prescribed by CYC. • Vehicular access will be taken from Murton Way, Stockton Lane & Bad Bargain Lane. Preferential walking and cycling routes are provided throughout the site to deliver direct routes which are logical and well-integrated to encourage use. Bus penetration routes will be provided through the site also. • The existing views and setting of York Minster, Millennium Way and Osbaldwick Conservation Area will be preserved and enhanced through a series of green corridors and retention of separation distances within the development masterplan. Including a large strategic greenspace located in the central area of the site in accordance with CYC’s proposals. • Ecological mitigation will be provided through the retention of existing features. The site previously contained a SINC, however, the ecological value of this area of the site has now been lost due to recent engineering works undertaken by Yorkshire Water. • The development proposals replicate the historical development patterns of the City in respect of the formation of a satellite settlement located on the periphery of the main urban edge.

Whilst the introduction of this letter focused on the need for CYC to expand the red line site allocation boundary to ensure the delivery of a minimum 845 home Garden Village at the site, the site has the potential to provide for a new garden village of either 845; 975; or up to 1,225 new homes, alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space and recreational facilities.

The site has been identified as strategic housing site allocation ST7 within iterations of the City of York Local Plan since June 2013. At that time the Preferred Options Local Plan identifies the site as having potential to deliver 1,800 homes. The number of homes to be provided at the site was retained at 1,800, along with an increase in the site’s allocation red line boundary, within the now withdrawn City of York Publication Draft Local Plan (October 2014). Prior to the withdrawal of the previous Publication Draft Local Plan, our clients undertook and submitted technical assessments associated with the delivery of the previously proposed red line site allocation boundary and the delivery of 1,800 homes at the site.

As CYC have previously undertaken public consultation and Sustainability Appraisal work in respect of the larger site, there remains the potential for the enlargement of the allocation back to the previously considered acceptable size, should CYC need to do so to meet the City’s increased housing needs.

The site is strategically located to the east of the City, but importantly separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible. The development proposals are situated in a suitable and highly sustainable location in respect of connectivity to existing jobs and services and there are no technical or environmental (built and natural) constraints that would preclude the development of the site.

This letter reiterates our client's design philosophy for the proposed development of a Garden Village at the site and demonstrates the site's deliverability for residential development in accordance with national planning guidance. In doing so the letter refers to the following documents which are enclosed:

- Indicative Masterplan – Option 1 – PRA Architects – August 2016
- Indicative Masterplan – Option 2 – PRA Architects – October 2017

In our previously submitted representations we provided the key conclusions of a number of technical assessments associated with the development proposals. The assessments referenced in our previous submissions provide an update of the comprehensive technical reports which were previously submitted to CYC in the promotion of the larger site area. The parameters established within the comprehensive technical reports were utilised in the preparation of the indicative masterplans for the site. Full versions of each of the above listed reports are of course available on request.

With regards to our proposed Option 1, which recommends the delivery of 975 homes at the site in order to meet an evidenced increase to the City's housing requirements, CYC's Officer's endorsed an increase in the proposed site allocation from 34.5ha (845 homes) to 44ha (975 homes) to CYC's Local Plan Working Group on the 10th July 2017. The reasoning behind the recommendation was as follows:

“This reflects developers/landowners concerns raised regarding the viability/deliverability of the site, the related ability to deliver the planning principles including provision of educational and community facilities and concerns over the provision of site access to the south of the site. Officers consider that this boundary amendment could improve the viability of the site and ensure that the planning principles can be delivered.”

This option was also put forward by CYC's Officer's as a potential change to the Local Plan ahead of consultation in respect of the Publication Draft Local Plan at CYC's Local Plan Working Group on the 23rd January 2018.

Whilst CYC's Officer's recommendations were not approved on either occasion, we believe there is still a strong case for the expansion of the site in respect of both size and housing numbers. As CYC's Officer's recommendation mirrors our proposed Option 1 in respect of size and number of homes, we fully support the previously proposed expansion of the site. These representations provide further evidence to substantiate CYC's Officer's recommendation, whilst also providing further evidence of the need to increase the size of the site in order to meet the increased housing needs of the City.

With regard to our proposed Option 2, the 1,225 homes opportunity for the development of the site was previously put forward for CYC's consideration on account of the potential need for additional housing numbers on account of the Government's recent announcement associated with a standardised methodology for calculating annual housing requirements. The planning arguments associated with the newly proposed second option are discussed in our previously submitted representations.

Notwithstanding the above, we believe that it is of paramount importance that in the first instance CYC ensure that the site allocation red line boundary for their proposed number of homes (845) is correct to ensure the delivery of a Garden Village style development alongside the comprehensive delivery of CYC's community and green infrastructure aspirations for the site as required by Policy SS9 of the Publication Draft Local Plan.

With this point in mind, within these representations we provide a new 845 home option for the site which, whilst retaining our proposed minimum allocation boundary, will provide the number of homes

desired at the site by CYC and also increase the amount of land provided for community and green infrastructure.

The updated masterplan options associated with the development of the site are as follows: -

- A. **New Proposed Option.** The delivery of 845 homes at the site. This option represents a deliverable and viable opportunity to meet CYC's proposed number of homes at the site, whilst also ensuring that each of CYC's proposed "Planning Principles" are delivered.
 - 1. The delivery of 975 homes at the site to meet any potential increase in the City's housing requirements, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC's proposed "Planning Principles" for the site. This option could also deliver an increase in economic and social benefits associated with the delivery of more homes at the site.
 - 2. The delivery of 1,225 homes at the site to meet any potential increase in the City's housing requirements, alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC's proposed "Planning Principles" for the site. This option could also deliver an increase in economic and social benefits associated with the delivery of more homes at the site.

The proposed development options have been formulated following the undertaking of ecology, landscape, Green Belt, flood risk, archaeology and highways assessments. The proposals seek to deliver a Garden Village development, community facilities and substantial areas of recreation and amenity areas. The vision of the proposals is to deliver a landscape led development which seeks to preserve and enhance the green framework of the site and its surroundings.

Within our previous representations we provided an assessment of each of the development options against each of CYC's policy parameters identified within draft local plan policy SS9. For brevity, we do not seek to repeat this assessment here and ask that CYC refer to our previous submissions which are enclosed with this letter.

However, in order to reaffirm our point in respect of the need to expand the current proposed site allocation red line boundary, we provide in the table below an analysis of the amount of land that would be available for community and green infrastructure within CYC's current site allocation red line boundary and each of our development options.

Option A (845 homes) has the same land area as the previously assessed Option 1 (975 homes) and as a result there is an increase in the land available for new community and green infrastructure, which will in turn allow the site to deliver all of the planning parameters in Policy SS9.

Ref.	CYC	Option A	Option 1	Option 2
Site Size / Capacity	35.4Ha / 845 Homes (845 plan period)	43.53Ha / 845 Homes (All within the plan period)	43.53Ha / 975 Homes (All within the plan period)	57.27 Ha / 1,225 Homes (All within the plan period)
Density / Design Ethos	Strategic Site – 70% net site area at 35dph	Garden Village – Approximately 60% net developable area – 26.4Ha at 32dph	Sub-Urban Garden Village – Approximately 70% net developable area - 30.47 Ha net site area at 32dph	Sub-Urban Garden Village – Approximately 70% net developable area – 40.1 Ha net site area at 32dph
Additional Land Uses / Analysis	<p>A density of 35 dph over the net developable area would result in a development that is similar in density to those currently taking place within the main urban areas of the City i.e. Redrow's scheme at the Grain Stores; Persimmon's scheme at Germany Beck and BDW's scheme at New Lane, Huntington.</p> <p>It does not allow for space/planting between dwellings or further green wedges/planting throughout the street scene. Which is what a Garden Village ethos requires. Which is more aligned to a density of 32dph and a net developable area of 60% to 70%</p> <p>At 32 dph over a 60% developable area, 680 homes could be delivered. This increases to 793 homes over a 70% new developable area.</p> <p>Increasing this to at least 845 homes, would therefore result in a reduction of the land available for the delivery of all of the other essential and desirable uses such as a new primary school, local centre and recreational open space.</p>	<p>The option can deliver: -</p> <ul style="list-style-type: none"> • 0.43Ha of land for a Local Centre • 1.91Ha of land provided for Nursery and a two-form entry Primary Education • 14.79 Ha of Open Space within the site. • The delivery of the required southern access road to Osbaldwick Link Road. • The existing views of York Minster and the setting of Millennium Way will be retained and enhanced through a series of green corridors proposed within the development masterplan. Alongside the green corridors, substantial areas of open space will be retained between the site's boundaries and existing settlement areas, including Osbaldwick Conservation Area. 	<p>The option can deliver: -</p> <ul style="list-style-type: none"> • 0.43Ha of land for a Local Centre • 1.91Ha of land provided for Nursery and a two-form entry Primary Education. • 10.72Ha of Open Space within the site. • The delivery of the required southern access road to Osbaldwick Link Road. • The existing views of York Minster and the setting of Millennium Way will be retained and enhanced through a series of green corridors proposed within the development masterplan. Alongside the green corridors, substantial areas of open space will be retained between the site's boundaries and existing settlement areas, including Osbaldwick Conservation Area. 	<p>The option can deliver: -</p> <ul style="list-style-type: none"> • 0.43Ha of land for a Local Centre • 1.91Ha of land provided for Nursery and a two-form entry Primary Education. • 14.83 Ha of Open Space within the site. • The delivery of the required southern access road to Osbaldwick Link Road. • The existing views of York Minster and the setting of Millennium Way will be retained and enhanced through a series of green corridors proposed within the development masterplan. Alongside the green corridors, substantial areas of open space will be retained between the site's boundaries and existing settlement areas, including Osbaldwick Conservation Area.

The similarities between each of TWF’s development options are clear. Whilst they all represent deliverable and viable development opportunities to deliver a significant proportion of the City’s housing needs, the difference between the three options is associated with the increase in proposed residential dwellings and, of course, the proportionate economic and social benefits associated with the delivery of more homes from the site.

The three proposed development options at the site can deliver the following economic and social benefits to the City of York: -

Socio-Economic Benefit	Option A 845 Homes	Option 1 975 Homes	Option 2 1,225 Homes
Creating sustainable communities through meeting market and affordable housing needs, offering existing and potential residents of the City the opportunity to live in the type of house and location they desire	Including up to <u>405</u> Affordable Homes	Including up to <u>292</u> Affordable Homes	Including up to <u>368</u> Affordable Homes
Delivering significant financial contributions towards the improvement of the City’s infrastructure including the provision of S106/CIL payments. The development has the potential to deliver a new primary school. There will also be significant contributions available to support the local secondary school, Archbishop Holgate’s School, as well as potential new pupils to ensure its future viability.	S106/CIL payments will increase proportionately for each Option		
New capital construction expenditure from private funding	£103.5m	£119.8m	£147.2m
Creation of substantial direct and indirect employment opportunities, including apprenticeships, of which 70% are usually retained in the local area.	339 Jobs	387 Jobs	405 Jobs
Sustaining and improving the District’s labour market through delivering the right homes in the right locations.	Benefit will increase proportionately for each Option		
Increased retail and leisure expenditure in the local area per annum	£19.7m	£22.8m	£28m
Creation of additional jobs within the local retail and leisure sector	115 Jobs	133 Jobs	164 Jobs
Provision of funding towards public services from the Government’s new homes bonuses	£7.4m	£8.56m	£10.5m
Provision of funding towards public services from annual Council tax payments	£1.23m	£1.43m	£1.75m
Provision of services including superfast broadband			

It is clear that all three of our proposed development option for the site can deliver substantial economic, social and environmental benefits to the local area and wider City.

The National Planning Policy Framework seeks to encourage sustainable growth and identifies in Paragraph 8 that economic growth, such as that which this site can deliver, can secure higher social and environmental standards. Furthermore, Paragraph 52 identifies that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements that follow the principles of Garden Cities (or a Garden Village in this case).

A NEW GARDEN VILLAGE – PRESERVING THE CHARACTER AND SETTING OF YORK

The site is located on the eastern boundary of the City adjacent to the Heworth, Tang Hall, Burnholme and Osbaldwick areas. Homes on the site will be designed and delivered within a comprehensive masterplan which will ensure that they respect the character of the surrounding area whilst seeking to incorporate 21st century designs to provide a development of its own unique character within a Green Framework. The proposals will contain design guides which will help to create a new exemplary Garden Village for York.

The Indicative Masterplan options prepared by PRA identifies the site’s potential to deliver the following:

- By undertaking a landscape led masterplan, development parcels have naturally been developed.

- Existing landscape features, including hedges and trees are retained within the site and can be further enhanced through additional planting within the built form.
- Adequate access can be achieved to the site for pedestrians, cyclists and vehicles, providing easy access to public transport and services which exist within the locality. Vehicular access will be taken from Murton Way, Stockton Lane & Bad Bargain Lane. Preferential walking and cycling routes are provided throughout the site to deliver direct routes which are logical and well-integrated to encourage use. Bus penetration routes will be provided through the site also.
- The existing views and setting of York Minster, Millennium Way and Osbaldwick Conservation Area are an important natural/built resource that have been preserved and enhanced through a series of green corridors and retention of separation distances within the development masterplan. Including a large strategic greenspace located in the central area of the site in accordance with CYC's proposals.
- Whilst the site comprises open land, its boundaries will be clearly well-defined, robust and enduring and have the ability to contain development within a framework of settlement, vegetation cover and landform.
- Sustainable drainage systems minimising surface water run-off will be delivered. The proposed drainage ponds will also provide ecological benefits.
- Up to 1.91Ha of land for new Primary School buildings and playing fields are to be provided on site.
- 10.72ha to 14.83ha of public open space distributed evenly throughout the site allowing easy access for all future residents of the development.
- Amenity space which has been carefully considered in terms of its position both in relation to its accessibility and usability and also in respect of its visual impact and sensitivity to its surroundings.
- Ecological mitigation will be provided through the retention of existing features. The site previously contained a SINC located close to the proposed southern access point, however, the ecological value of this area of the site has now been lost due to recent engineering works undertaken by Yorkshire Water.
- The development parcels, although secondary in their positioning within the site, will provide 845, 975 or 1,225 homes in a high-quality environment sitting harmoniously within wider landscape setting.

The site was identified by the Council because it is not located in an area of "Primary Constraint" and does not compromise York's future Green Belt proposals. The development has been master-planned so that it will have minimum impact on the historic character and setting of the City. As stated above, the existing views and setting of York Minster, Millennium Way and Osbaldwick Conservation Area will be preserved and enhanced through a series of green corridors and retention of existing separation distances from present residential areas.

The development proposals replicate the historical development patterns of the City in respect of the formation of a satellite settlement located on the periphery of the main urban edge.

H2 Landscape Planning Partnership, previously undertook a Landscape & Visual Impact Assessment of the site in association with the previously proposed larger housing allocation. This work was previously submitted to CYC. They have assessed the amended proposals for the site and have concluded that the current masterplan is fully in accordance with their previously identified Landscape and Visual Impact recommendations.

With regards to built heritage, the prominence of the Minster and the corresponding low-lying surrounding landscape, allow far-reaching views which emphasise the strong identity of the city. As such, the City Council are keen to ensure that this dominance is protected within new development, alongside the ability to appreciate and understand the historic settlement of York itself. As identified above, future development within the site will take these aspects into consideration.

With regard to the tangibility of the historic City, the proposed development area has not been highlighted by the Council within their Historic Character and Setting Update (2013) or their earlier 2011 document as contributing to the City's historic character and setting. However, land adjacent to the

development area to the east has been highlighted as an '*area preventing coalescence*' and an '*area retaining rural setting*'. Modern housing already forms a separation with the historic urban form to the west of the site and extension within this area would not remove the understanding of the historic form within the city. There is the potential for infringement upon the historic village of Osbaldwick, one of the city's historic satellite settlements; however, as can be seen from the enclosed indicative masterplans, this can be mitigated through the provision of the proposed substantial separation buffer.

With regard to views of York Minster, the development area does lie within one key long-distance view and one key city-wide view, as defined in the York City Central Historic Core Conservation Area Appraisal. Both incorporate long-distance views of the Minster, within which the urban form already forms part of the backdrop. The enclosed indicative masterplans seek to preserve these views through the provision of a series of green corridors and specifically through the delivery of the central strategic greenspace as desired by CYC. Furthermore, it is considered unlikely that low-level residential development will form a dominant feature of these views and will not interrupt any existing key views.

Accordingly, there are no heritage matters which would preclude the development options proposed at the site.

The development proposals will deliver a landscape led development which is separated from the existing urban edge and surrounding villages and ensures that the historic and landscape character of this area of the City is preserved and enhanced where possible.

MEETING THE CITY OF YORK'S FUTURE HOUSING NEEDS

We maintain our view that there is a case for the identification of additional housing allocations to those currently proposed by CYC in order to meet the City's housing needs over the proposed plan period.

At present the Council have maintained their decision to progress with a housing target which is based solely on the baseline figure which is derived from the ONS 2014-based sub-national household projections and does not include the 10% uplift for market signals which is advised within the Council's latest SHMA.

By omitting the 10% uplift, and not progressing with a housing requirement of 954 dwellings per annum, the Council are failing to meet their full OAN, as required by the Framework and the Planning Practice Guidance (PPG). There are considered to be no overarching constraints within the District that justify the Council not delivering their full OAN. Such an approach therefore fails to meet any of the tests of soundness set out in paragraph 182 of the NPPF as the Local Plan is not positively prepared; justified; effective and consistent with national policy.

No new evidence has been provided by the Council to justify the removal of the SHMA's proposed 10% uplift for market signals and it is assumed that this has been viewed as a way of reducing the overall housing target. This is unacceptable and is not a sound and robust means of preparing a Local Plan.

The Government's consultation document "*Planning for the Right Homes in the Right Places*" (September 2017) identified a proposed standardised methodology for the calculation of the baseline OAN for each of the Country's Local Authority areas. The Government's proposed standardised methodology includes for an uplift for market signals over and above the baseline figure and in the specific case of York, would lead to a housing requirement of 1,070 dwellings per annum.

Since the commencement of CYC's consultation on the Publication Draft Local Plan, the Government have published further consultation documents associated with a Revised National Planning Policy Framework and Draft National Planning Practice Guidance in March 2018.

The Draft National Planning Practice Guidance (Draft NPPG) provides further guidance in respect of the calculation of an LPA's OAN. The document maintains the proposed standardised methodology for

the calculation of OAN, using household projections as the baseline and an uplift for market signals. However, it also identifies the following other key considerations: -

- Plan-making authorities should not apply constraints to the overall assessment of need. Limitations including supply of land, capacity of housing markets, viability, infrastructure, Green Belt or environmental designations, are considerations when assessing how to meet need. These types of considerations are not relevant to assessing the scale of that need.
- There may be circumstances where it is justifiable to identify need above the need figure identified by the standard method. The need figure generated by the standard method should be considered as the minimum starting point in establishing a need figure for the purposes of plan production. The method relies on past growth trends and therefore does not include specific uplift to account for factors that could affect those trends in the future. Where it is likely that additional growth (above historic trends identified by household projections) will occur over the plan period, an appropriate uplift may be applied to produce a higher need figure that reflects that anticipated growth. Circumstances where an uplift will be appropriate include but are not limited to; where growth strategies are in place, strategic level infrastructure improvements are planned, funding is in place to promote and facilitate growth (i.e. Housing Deals, Housing Infrastructure Fund). **We would consider the impact of anticipated growth through an Enterprise Zone (York Central, which is also an identified Housing Zone) to be included as an appropriate circumstance to increase housing growth as well. CYC have also submitted two Housing Infrastructure Fund bids to Government as well. One at York Central and one at the Clifton Gate site.**
- The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow. The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the strategic plan may need to be considered where it could help deliver the required number of affordable homes. **Given York's affordable housing needs, we consider that compelling evidence is available to justify an uplift in the OAN on in order to meet such housing needs.**

Although the Revised NPPF and Draft NPPG are still subject to consultation, they provide a further indication as to how the Government considers housing requirements should be calculated, and the consideration of market signals, strategic growth (employment & housing) and affordable housing as key issues to be considered. Which align closely with the current provisions of the NPPF. Put simply, the guidance provided in the bullet points above cannot be ignored.

The Council are now in a position where their own evidence and the Government's proposed standardised methodology, all state that an uplift for market signals should be added to the baseline figure, and all of which indicate that the true full OAN is greater than the 867 dwellings per annum which is being proposed.

Therefore, in order to make the plan sound, the housing figure should be adjusted upwards to consider market signals, strategic growth and affordable housing needs. This in turn will require additional sites to be allocated for residential development.

Our clients have also previously identified concerns with the approach taken by CYC with regard to the delivery of windfall development throughout the plan period. Such a reliance on unplanned development is contrary to the legislative provision of a plan-led system and should not form the basis of the CYC Local Plan moving forwards. Such an approach will not direct homes to those areas that have seen limited growth over recent years and have a clear need for new homes in the future. It is also highly

likely that no affordable housing will be provided on windfall sites located in the Urban Area on account of the 15-dwelling threshold proposed in draft Policy H10.

Finally, there are also concerns associated with the deliverability of the York Central and Barrack sites.

In respect of York Central this relates to uncertainties over the timescales associated with the site's initial infrastructure works and the final quantum of new homes that can be delivered at the site. We have raised a number of concerns over the ability of the York Central site to deliver the proposed number of homes within the plan period at every stage of consultation on the Local Plan. However, notwithstanding these comments, the number of homes anticipated to be delivered at the site has been increased to between 1,700 and 2,500, with a minimum of 1,500 homes within the plan period. The provision of a range of housing numbers is evidence to justify our case of the uncertainties associated with the development of the site. Furthermore, there is no justifiable evidence to back up these figures.

With regard to the Barrack sites, the concerns relate to *when* and *if* both of the sites will become available for development within the plan period. At present no concrete evidence has been provided by the Ministry of Defence that these sites are indeed no longer needed.

Unless these current uncertainties are resolved, it is our view that the quantum of new homes to be delivered at these sites should be considered over and above the identification of housing allocations to meet the City's housing needs. If not, there is a real possibility that that the City could fail to demonstrate the delivery of a sufficient number of deliverable housing sites to meet the City's housing requirement.

In conclusion, when each of the above points are considered holistically, there is a compelling case for the release of additional land as housing allocations within the emerging CYC Local Plan in order to meet the City's full objectively assessed housing needs, such as an extension of our client's Land East of Metcalfe Lane site to deliver at least 975 homes.

Notwithstanding the above, in the first instance CYC need to ensure that the site allocation red line boundary for their proposed number of homes (845) at the Land East of Metcalfe Lane site is correct to ensure the delivery of a Garden Village style development alongside the Council's community and green infrastructure aspirations for the site as required by Policy SS9 of the Publication Draft Local Plan.

MECHANISM TO AMEND THE SITE ALLOCATION BOUNDARY

There is a legal process which CYC can undertake in order to amend the red line site allocation boundary ahead of the submission of the Local Plan to the Secretary of State.

The process includes the following steps: -

- Amend the Local Plan's Proposal Maps;
- Update the Local Plan's Sustainability Appraisal;
- Update Local Plan Policy SS9 (if necessary); &
- Reference the amendments to the Proposal Maps and Policy SS9 within a Modifications Document to be submitted to the Secretary of State along with the Local Plan.

In order for the Local Plan to meet its legal obligations, it is necessary for the Sustainability Appraisal to be up to date in respect of the final, submitted, red line site allocation boundary for the site and the quantum of development proposed.

Consequently, should CYC update the current Sustainability Appraisal in accordance with the red line site allocation boundary proposed within our representations for the 845 homes option, and include reference to the quantum of development identified in the table above on Page 5 of these representations, then CYC would be legally allowed to amend the red line site allocation boundary prior to the submission of the Local Plan to the Secretary of State.

As adequate consultation has already taken place on a variety of development options for the site previously, including a much larger site area, the Local Plan would be considered sound with regards to the obligations of national planning policy and guidance.

We urge CYC to undertake the tasks identified above to ensure that the Local Plan can be found sound on the submission of the Local Plan to the Secretary of State in respect of Local Plan Policy SS9.

CONCLUSIONS

On the basis of the information provided within this letter, and the enclosed documentation, we wish to place on record our **support** for the proposed allocation of Land to the East of Metcalfe Lane which is currently proposed by CYC as a new Garden Village within the emerging City of York Local Plan.

Whilst we want to work alongside CYC to ensure the delivery of a sound Local Plan for the City, we are concerned that unless changes are made to the Publication Draft Local Plan prior to its submission to the Secretary of State, it will not be in a position where it can be found sound. With regards to the East of Metcalfe Lane site, this relates to the proposed site allocation boundary.

Whilst we support the principles of the allocation of the site, we believe that amendments are required to the site's proposed boundaries in order to ensure that CYC's Garden Village philosophy for the site can be delivered alongside each of CYC's identified Planning Parameters.

Whilst the delivery of 845 homes at the site within the plan period can be considered sound in respect of Paragraph 182 of the NPPF. We believe that Policy SS9 of the Local Plan would be considered more robust and sound if the red line site allocation boundary is amended to mirror that which we propose in our client's 845 home option.

Furthermore, these representations have also presented a compelling case for the release of additional land as housing allocations within the emerging CYC Local Plan in order to meet the City's full objectively assessed housing needs.

Consequently, our proposals have the potential to provide a new Garden Village of either 845 homes, 975 homes or 1,225 homes, alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space, allotments and recreational facilities. The site is strategically located to the east of the City, but importantly separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible.

The development proposals are situated in a **suitable** and highly sustainable location and there are no technical or environmental (built and natural) constraints that would preclude the development of the site. The site is **available** now as it is under the control of a regional development company who are actively seeking to secure the site's allocation for residential development. The site can also be considered **achievable** as new homes can be delivered on the site within the next 5 years and indeed within the first five years of the Local Plan.

In light of the guidance provided in Paragraph 182 of the NPPF, we consider the following: -

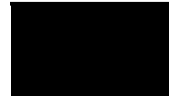
- The Local Plan is **positively prepared** in respect of the delivery of 845 homes at the Land East of Metcalfe Lane site as the delivery of homes from the site will contribute significantly to meeting the evidenced objectively assessed development and infrastructure requirements of the City.
- The Local Plan is **justified** in respect of the Land East of Metcalfe Lane site as compelling evidence has been provided in this and previously submitted representations to demonstrate that the site's allocation is an appropriate strategy for delivering a sustainable Garden Village of 845 homes in this location of the City;

- The Local Plan is **effective** as the proposed housing numbers at the Land East of Metcalfe Lane site are entirely deliverable within the plan period; &
- The Local Plan is **consistent with national policy** in respect of the Land East of Metcalfe Lane site as compelling evidence has been provided to demonstrate that the proposed development will deliver sustainable development within the plan period. Particular in respect of Paragraph 52 of the NPPF which identifies that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements that follow the principles of Garden Cities (or a Garden Village in this case).

Finally, in respect of procedural matters, we would like to work alongside CYC to finalise the site specific strategic development policy to be included within future versions of the Local Plan. Working together we can ensure that CYC's and the local community's planning parameters for the site are deliverable.

Should you require any further details or clarification on the content of this letter please do not hesitate to contact me.

Yours sincerely,

A black rectangular box redacting the signature of Paul Butler.

PAUL BUTLER

Director

A black rectangular box redacting the contact information of Paul Butler.

From: Paul Butler [REDACTED]
Sent: 25 July 2019 15:12
To: localplan@york.gov.uk
Cc: [REDACTED]
Subject: RE: YORK LOCAL PLAN - PROPOSED MODIFICATIONS CONSULTATION - OSBALDWICK - SUPPORT FOR SITE REFERENCE ST7
Attachments: 1000.36 B ST7 - Osbaldwick - 845 Homes - Development Areas 24.07.19.pdf

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good afternoon,

I write further to my email below and our recent submission of representations to the Proposed Modifications to the York Local Plan.

Within the representations we referenced the submission of an updated masterplan for the development associated with the Council's current proposed site allocation boundary. Enclosed above is a Development Areas plan outlining the proposed land uses within the allocation area. An Illustrative Masterplan corresponding with this will follow shortly.

Can you please add the enclosed document to your files in respect of our submissions for Site Ref. ST7.

Kind regards,

Paul

Paul Butler
Director



www.pbplanning.co.uk

[REDACTED]
[REDACTED]
PO Box 827, York, YO31 6EE

From: Paul Butler
Sent: 22 July 2019 15:03
To: localplan@york.gov.uk
Cc: [REDACTED]
Subject: YORK LOCAL PLAN - PROPOSED MODIFICATIONS CONSULTATION - OSBALDWICK - SUPPORT FOR SITE REFERENCE ST7

Dear Sir or Madam,

We write on behalf of our clients TW Fields to provide City of York Council (CYC) with their representations to CYC's Proposed Modifications to the York Local Plan (June 2019).

Please find enclosed our representations to the Proposed Modifications consultation. We request our previous representations are considered alongside this letter as part of a holistic and comprehensive representation for Land East of Metcalfe Lane, Osbaldwick (Site Ref. ST17).

Our client continues to **support** CYC's identification of the site as a new Garden Village within the emerging City of York Local Plan. However, it is our view that CYC should have taken the opportunity presented through the Proposed Modifications consultation to resolve our concerns with the current red line site allocation boundary. Whilst the site can deliver 845 homes within

the plan period within CYC's proposed site allocation boundary, it is our view that the current boundary should be expanded in order to enhance the community and green infrastructure that the site can deliver in respect of the policy aspirations required by Policy SS9 of the Publication Draft Local Plan.

Should you require any further details or clarification on the content of the enclosed representations please do not hesitate to contact me.

Kind regards,

Paul

Paul Butler
Director



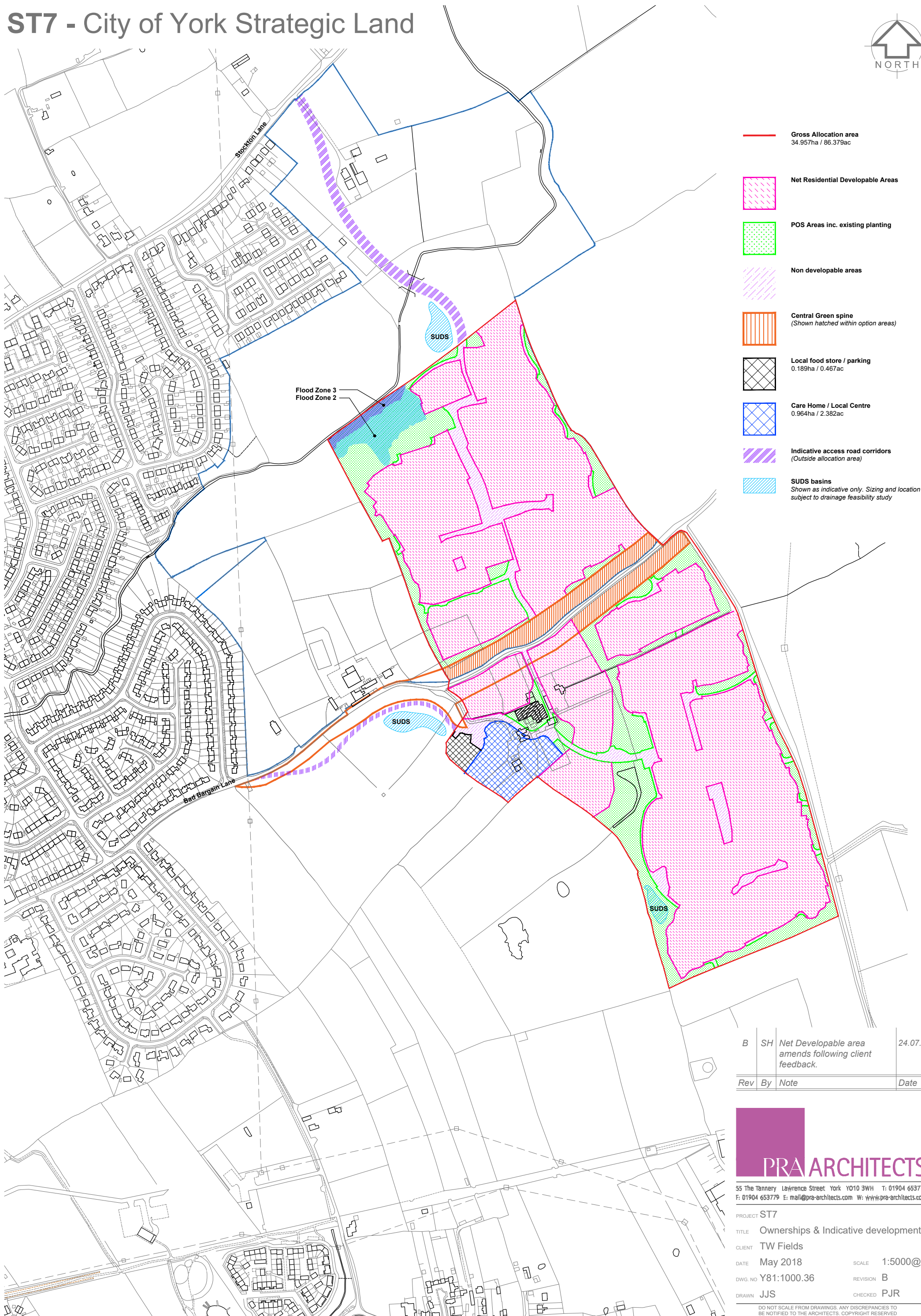
www.pbplanning.co.uk

████████████████████

██████████

PO Box 827, York, YO31 6EE

ST7 - City of York Strategic Land



- Gross Allocation area**
34.957ha / 86.379ac
- Net Residential Developable Areas**
- POS Areas inc. existing planting**
- Non developable areas**
- Central Green spine**
(Shown hatched within option areas)
- Local food store / parking**
0.189ha / 0.467ac
- Care Home / Local Centre**
0.964ha / 2.382ac
- Indicative access road corridors**
(Outside allocation area)
- SUDS basins**
Shown as indicative only. Sizing and location subject to drainage feasibility study

B	SH	Net Developable area amends following client feedback.	24.07.19
Rev	By	Note	Date



55 The Tannery Lawrence Street York YO10 3WH T: 01904 653772
F: 01904 653779 E: mail@pra-architects.com W: www.pra-architects.com

PROJECT ST7
 TITLE Ownerships & Indicative development areas
 CLIENT TW Fields
 DATE May 2018 SCALE 1:5000@A3
 DWG. NO Y81:1000.36 REVISION B
 DRAWN JJS CHECKED PJR

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From: Josh Brear [redacted]
Sent: 19 July 2019 17:20
To: localplan@york.gov.uk
Cc: [redacted]
Subject: City of York Local Plan Proposed Modifications 2019 - Linden Homes Strategic Land
Attachments: Final SF15 - Land North of Escrick - PM Response Form 2019.pdf; Final SF15 - Land North of Escrick - PM Repls Letter 2019.pdf; Final 882 - Land at Askham Lane, Acomb - PM Repls Letter 2019.pdf; Final SF4 - Land North of Haxby - PM Repls Letter 2019 - Linden Homes.pdf; Final SF4 - Land North of Haxby - PM Response Form 2019 - Linden Homes.pdf; Final 882 - Land at Askham Lane, Acomb - PM Response Form 2019.pdf; Final H38 - Land rear of Rufforth Primary School, Rufforth - PM Response....pdf; Final ST9 - Land North of Haxby, Haxby - PM Repls Letter 2019 - Linden Ho....pdf; Final ST9 - Land North of Haxby, Haxby - PM Response Form 2019 - Lindenpdf; Final H38 - Land rear of Rufforth Primary School, Rufforth - PM Repls Let....pdf

Follow Up Flag: Follow up
Flag Status: Completed

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

Please find attached representations responding to the City of York Local Plan Proposed Modifications 2019, made on behalf of Linden Homes Strategic Land, having regard to the following sites:

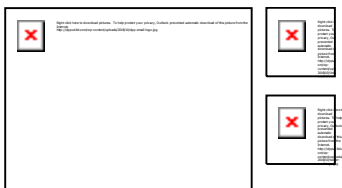
- Land North of Haxby, Haxby (ref: SF4)
- Land North of Escrick, Escrick (ref: SF15)
- Land North of Haxby, Haxby (ref: ST9)
- Land rear of Rufforth Primary School, Rufforth (ref: H38)
- Land at Askham Lane, Acomb (ref: 882)

Following receipt of this email, can a member of the Council’s Planning Policy team please respond to this email confirming that the representation has been received.

Kind Regards,

Josh

Josh Brear
Senior Planner



This email (and any attachments) is confidential and may be privileged. It is intended solely for the addressee. If you have received it in error, please contact us immediately. Any disclosure, copying, distribution or action taken as a result of this email is prohibited and may be unlawful.

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City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make.

Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Mark
Last Name		Lane
Organisation (where relevant)		DPP
Representing (if applicable)		Linden Homes Strategic Land
Address – line 1		██████████
Address – line 2		██████
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		██████████
E-mail Address		Mark.Lane@dppukltd.com
Telephone Number		██████████

Representations must be received by Monday 22 July 2019, up until midnight.

Representations received after this time will not be considered duly made.

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM4

Document:

Publication Draft Local Plan (February 2018)

Page Number:

Page 26

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Please see supporting representation letter.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared	<input type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

The Local Plan does not provide sufficient housing land to meet a properly formulated assessment of objective need and those sites identified will not deliver the units identified. On the basis of the above we consider that the Local Plan is unsound and will not be effective and therefore does not deliver sustainable development in accordance with national policy.

Please see supporting representation letter for full comments.

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

To make the local plan sound it is recommended that an uplift for market signals and affordable housing need is provided, that an allowance is made for improving headship rates and that the 2014 Projections are used instead of the 2016 Projections. We consider that Policy SS1 and subsequent affected policies are modified to reflect the following:

The OAHN should be 1,150 per annum to allow for a sufficient uplift to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs.

Please see supporting representation letter for full comments.

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To elaborate on our written representation.

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 2018 to inform the Local Plan process. We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't. City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

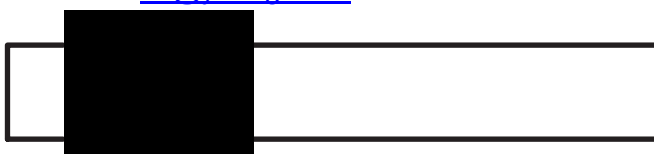
Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

Signature



Date

19th July 2019

DPP Planning
One Park Row
Leeds
LS1 5HN

info@dppukltd.com
www.dppukltd.com



FREEPOST RTEG-TYYU-KLTZ
Local Plan
City of York Council
West Offices
Station Rise
York
YO1 6GA

19th July 2019

Your ref: SF4
Our ref: JB/ML/2411le

Dear Sir / Madam,

COMMENTS ON THE CITY OF YORK LOCAL PLAN PROPOSED MODIFICATIONS CONSULTATION (10TH JUNE 2019 – 22ND JULY 2019) AND IN RESPECT OF LAND NORTH OF HAXBY (SAFEGUARDED LAND SITE REF: SF4)

Introduction

Thank you for this opportunity to provide further commentary and representation to the City of York Local Plan Proposed Modifications (“the Proposed Modifications”) and its associated evidence base.

This submission is made on behalf of Linden Homes Strategic Land (“the Developer”) and should be read in conjunction with previous detailed representations submitted to the City of York Council (“the Council”), throughout the plan making process which demonstrate that the proposed housing allocation on land North of Haxby (safeguarded land ref: SF4) (“the Site”) is suitable for housing development, that is available and that residential development is viable and achievable on the Site.

Cardiff

Leeds

London

Manchester

Newcastle upon Tyne

DPP One Limited
Company number 08129507
VAT number 138284595

In relation to the Proposed Modifications we have set out the representation under the following headings:

- Background
- The Test of Soundness
- The Proposed Modifications
- Comments and Observations on the Proposed Modifications
- Our Proposed Amendments
- Conclusions

Background

Site SF4 was assessed as part of the Council's rigorous selection methodology and as a result of passing this process; the Site was proposed as safeguarded land within the Preferred Options Draft (2013) and the Local Plans Working Group Publication Draft (2014) versions of the local plan. In this regard the Council must have previously satisfied themselves that the Site is available, suitable for development and the development is achievable at the point in time when the Site is intended to deliver development.

The Council's current position is that, due to revisions to the evidence base and notably the proposed reduction in the housing requirement, certain previously proposed allocations have been modified or deleted. This does not mean that these sites or parts of these sites are unsuitable or inappropriate for development. Rather it simply means that the Council now consider that these sites or parts of these sites are less preferable than those sites proposed in the previous draft versions of the local plan.

On the basis of the Council's revised evidence base and the alleged lower housing requirement, the Council have sought to reduce the number of housing allocations and safeguarded land; the Council have therefore removed safeguarded land from the local plan, including SF4.

The Developer objects to the deletion of SF4.

The Test of Soundness

Paragraph 182 of the NPPF (2012) indicates that a Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

The Proposed Modifications

Policy SS1 – Delivering Sustainable Growth for York

The City of York Council are proposing to reduce the housing requirement from 867 dwellings per annum to 790 dwellings per annum. The Proposed Modifications largely follow and are consequent upon the amendment to Policy SS1 which sets a need to deliver a minimum annual provision of 790 new dwellings over the plan period to 2032/33 and post plan period to 2037/38.

- PM3: Paragraph 2.5
- PM4: Policy SS1
- PM5: Explanation to SS1
- PM20a-d: Figure 5.1
- PM21a-d: Table 5.2
- PM22: Paragraph 5.9
- PM44: Table 15.2

Comments and Observations on the Proposed Modifications

The Proposed Modifications are based on the Housing Needs Update 2019; which was produced by GL Hearn to take into account the 2016-based sub-national population and household projections from ONS and CLG (“the 2016 Projections”).

The 2016 Projections reflect the following:

- Life expectancy will not increase at the same rate as previously.
- International in-migration is not expected to continue at the same rate as previously.
- A reduction in the household formation rates.

On behalf of the Developer we object to the use of the 2016 Projections as a base for the Proposed Modifications. The reasons for this are as follows.

The Ministry of Housing, Communities and Local Government (‘CLG’) published a Technical Consultation on updates to the national planning policy and guidance document in October 2018. The document seeks views on changes to planning practice guidance on the standard method for assessing local housing needs to ensure consistency with the Government’s objective of building more homes.

The document reaffirms the Government’s priority which is to deliver more and better designed homes and this has been a prominent theme in Government documents published over the last 18 months. The document indicates that since the publication of the standard methodology, the base data has changed in that the household projections were produced by CLG but are now supplied by the Office of National Statistics (‘ONS’).

The ONS published the latest household projections on 20th September 2018. These reduce the projected rate of household formation compared to the previous projections (“the 2014 Projections”), and the Government indicates within the document that this results in the national minimum annual housing need calculated using the standard method falling significantly. The numbers have fallen from 269,000 homes (rounded up to 300,000 dwelling per

annum) prior to publication, to approximately 213,000 based on the updated data. This now sets the national minimum annual housing need figure to below the 217,350 homes delivered last year.

The paper confirms that the Government has considered whether it needs to change its aspirations for housing supply in light of the new household projections and the paper indicates at paragraph 11 that it has decided that it is not right to change its aspirations. Paragraph 11 gives the following reasons:

- The annual change in household projections comprises two aspects: a reduction of 29,000 arising from the lower population projections, and a reduction of 23,000 arising from changes in the method for converting population change into estimates of household formation – (reducing the historic period of household formation on which the projections are based from five census points to two, which focuses it more acutely on a period of low household formation where the English housing market was not supplying enough additional homes). In this regard the Government considers that methodological changes are not a reason why the Government should change its aspirations.
- Household projections are constrained by housing supply. If new, additional homes are not supplied, then households cannot form as there would be nowhere for them to live.
- The historic under-delivery of housing means there is a case for public policy supporting delivery in excess of household projections, even if those projections fall.
- Other things being equal a more responsive supply of homes through local authorities planning for more homes where we need them will help to address the effects of increasing demand, such as declining affordability, relative to a housing supply that is less responsive.
- The above factors have led to declining affordability, as evidenced by the decrease in the number of people living in an area with an affordability ratio of 4 or less: from 23 million (47% of the population) in 2000, to 395,000 (less than 1% of the population) in 2017. Similarly, there has been an increase in those living in areas with an affordability ratio of more than 8: from 2.8 million (around 6% of the population) to 28 million (nearly 50% of the population) over the same period. This indicates that the Government should not be less ambitious for housing supply.

The Government also concludes that population changes are only one aspect of the driver for housing supply. Rising incomes, changing social preferences and factors such as real interest rates and credit availability contribute to demand for housing.

The paper also refers to the ONS and indicates that the ONS believe that the updated 2016-based household projections do not take into account how many people may want to form new households, but for whatever reason are unable to, such as first-time buyers or people wanting to live on their own instead of a house share. Therefore, this snapshot of past trends is not a measure of how many houses would need to be built to meet housing demand. The ONS confirm that although the projections are lower than previously published, this does not directly mean that fewer houses are needed in the future.

The Government has therefore concluded that there is no need to change its aspirations for increasing housing supply and remain committed to delivering 300,000 dwellings pre-annum.

The Government considers that the best way of responding to the new ONS household projections is to make three changes:

- For the short-term, specify that the 2014-based data will provide the demographic baseline for assessment of local housing need;
- To make clear in national planning practice guidance that lower numbers through the 2016-based projections do not qualify as an exceptional circumstance that justifies departure from the standard methodology; and
- In the longer term, to review the formula with a view to establishing a new method.

This is now reflected in the Planning Practice Guidance (PPG) which indicates that *“any method which relies on using the 2016-based household projections will not be considered to be following the standard method as set out in paragraph 60 of the National Planning Policy Framework. As explained above, it is not considered that these projections provide an appropriate basis for use in the standard method.”* The impact of the 2016 Projections, if applied to a calculation based on an OAHN, is no different to their application under the standard methodology. It is therefore clear from the Governments Technical Consultation and the PPG that the 2016 Projections should not be used.

In conclusion on the use of the 2016 Projections, these show a general decrease in household growth which is at odds with the Government stated aspiration which to increase housing delivery to 300,000 dwellings per annum by the mid-2020s and it is recognised that this will not be achieved if the local planning authorities adopt the 2016 Projections to either calculate their Objective Assessment of Housing Need (“OAHN”) or in utilising the standard method of calculating the Local Housing Need Assessment.

We therefore consider that the evidence base, upon which the Proposed Modifications are formulated, to be unsound in that that it is not positively prepared and does not meet the area’s development needs, it is not justified as it is not the most appropriate strategy and it will not be effective in meeting the City’s needs and is not consistent with national policy.

Notwithstanding our concerns about the use of the 2016 Projections we also have concerns about the City of York Housing Needs Update dated January 2019, specifically we note that the approach taken by GL Hearn in this document is not consistent in its approach to the preparation of the previous SHMA and addendum update (May 2017) also produced by GL Hearn.

In particular we note that:

- The 2017 SHMA recommends that based on their assessment of market signals evidence that York should include a 10% market signals adjustment to the 867 figure. This would increase the housing figure to 953 per annum. The market adjustment is based on an assessment of both market signals and affordable housing need. GL Hearn considered a single adjustment to address both of these issues as they are intrinsically linked. This approach has been abandoned in the City of York Housing Needs Update dated January 2019.
- Despite previously identifying a net affordable housing need of 573 dwellings per annum, the City of York Housing Needs Update dated January 2019 does not reassess this need. It does note at paragraph 4.28 that *“it seems clear from this that the expectation is that it may be necessary, based on the affordable needs evidence to consider an adjustment to enhance the delivery of affordable housing, but that this does not need to be done in a ‘mechanical way’ whereby the affordable need on its own drives the OAN.”* No uplift to address the affordable housing crisis has however been made.
- Further the City of York Housing Needs Update dated January 2019 notes that market signals show that housing affordability is a worsening issue in York and that house prices have increased in the past year and the affordability ratio between house prices and earnings has also worsened. The City of York Housing Needs

Update dated January 2019 indicates that these housing market signals suggest that, in accordance with PPG, an uplift to the demographic projections is appropriate. However, no uplift has again been made.

- We welcome the use of the economic led housing need scenario in the City of York Housing Needs Update dated January 2019. This reflects a positive attitude to growth and accords with one of the basic principles of the NPPF. The scenario considered is 11,050 plus additional jobs over the remaining 17 years of the plan period to 2031 (2014 to 2031). This equates to the creation of 650 new jobs per annum and these new jobs have been converted to a housing requirement. However, the creation of new jobs within the City does not reduce the market signals or the affordable housing crisis. It is plain that the suggested uplift of 15%, as recommended by GL Hearn in the City of York Housing Needs Update dated January 2019, should have been added to the economic led housing need of 790 dwellings per annum.
- As made clear in the City of York Housing Needs Update dated January 2019 the economic led housing need scenario considers the plan period to 2031 (2014 to 2031) whereas the Local Plan provides for development in the period to 2032/2033 and in the post plan period to 2037/2038 to ensure that the Green Belt endures beyond the plan period. The figure of 790 dwellings per annum, which is reflected in the Proposed Modifications, therefore does not address the correct plan period and does not meet the housing need.
- Finally, the figure of 790 dwellings per annum is the need identified in the City of York Housing Needs Update dated January 2019 and this is reflected in the Proposed Modification. The figure of 790 dwellings per annum does not take into account persistent under-delivery.

The findings within the associated evidence bases are contradictory and provide polar opposite results, even though the documents are less than 1 ½ years apart and produced by the same consultant. Further there is little in the way of explanation as to why there has been a change in approach.

We therefore consider that the evidence base, upon which the Proposed Modifications are formulated, to be unsound as the evidence and therefore the plan has not positively prepared and does not meet the area's development needs. It is not justified as it is not the most appropriate strategy and it will not be effective in meeting the City's needs, it is also therefore not consistent with national policy.

Our Proposed Amendments

There are a number of significant deficiencies in the City of York Housing Needs Update which mean that the 790 dwellings per annum OAHN figure currently being pursued by the Council within the Proposed Modifications is unsound. The housing requirement and evidence base are not justified and the local plan will not be effective in meeting the City's needs. It has not been positively prepared and the approach adopted does not reflect Government Guidance.

To make the local plan sound it is recommended that an uplift for market signals and affordable housing need is provided; that an allowance is made for improving headship rates and that the 2014 Projections are used instead of the 2016 Projections.

We consider that Policy SS1 and subsequent affected policies are modified to reflect the following:

- The OAHN should be 1,150 per annum to allow for a sufficient uplift to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs.

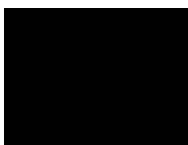
This suggested modification reflects the professional opinion of the property sector and is echoed by the House Building Federation and other parties with a vested interest.

Conclusions

On behalf of the Developer we would like to attend the oral examination, to further progress the soundness of the Plan with regard to supply of housing for the City of York.

Please can we be kept informed of all forthcoming consultations upon the Local Plan and associated documents, by using the contact details provided below for future correspondence.

Yours sincerely,



Mark Lane

Director

DPP One Ltd

Mark.Lane@dppukltd.com



[Redacted]

From: localplan@york.gov.uk
Sent: 22 July 2019 15:17
To: localplan@york.gov.uk
Subject: FW: City of York Local Plan Proposed Modifications 2019 - Linden Homes Strategic Land Re Site 882

Attachments: Final 882 - Land at Askham Lane, Acomb - PM Reps Letter 2019.pdf; Final 882 - Land at Askham Lane, Acomb - PM Response Form 2019.pdf

Follow Up Flag: Follow up
Flag Status: Completed

From: Josh Brear [Redacted]
Sent: 19 July 2019 17:20
To: localplan@york.gov.uk
Cc: [Redacted]
Subject: City of York Local Plan Proposed Modifications 2019 - Linden Homes Strategic Land

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

Please find attached representations responding to the City of York Local Plan Proposed Modifications 2019, made on behalf of Linden Homes Strategic Land, having regard to the following sites:

- Land North of Haxby, Haxby (ref: SF4)
- Land North of Escrick, Escrick (ref: SF15)
- Land North of Haxby, Haxby (ref: ST9)
- Land rear of Rufforth Primary School, Rufforth (ref: H38)
- Land at Askham Lane, Acomb (ref: 882)

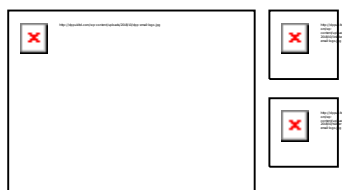
Following receipt of this email, can a member of the Council’s Planning Policy team please respond to this email confirming that the representation has been received.

Kind Regards,

Josh

Josh Brear
Senior Planner

■ [Redacted]
 ■ [Redacted]
 ■ [Redacted]



This email (and any attachments) is confidential and may be privileged. It is intended solely for the addressee. If you have received it in error, please contact us immediately. Any disclosure, copying, distribution or action taken as a result of this email is prohibited and may be unlawful.

Warning: Whilst we believe this email and any attachment are free of any virus or other defect which might affect your system it is your responsibility to ensure that this is so. We accept no liability for any loss or damage caused in any way by its receipt or use.

If you do not wish to receive emails from DPP one Ltd please unsubscribe by emailing: unsubscribe@dppukltd.com

City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make.

Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Mark
Last Name		Lane
Organisation (where relevant)		DPP
Representing (if applicable)		Linden Homes Strategic Land
Address – line 1		██████████
Address – line 2		██████
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		██████████
E-mail Address		Mark.Lane@dppukltd.com
Telephone Number		██████████

Representations must be received by Monday 22 July 2019, up until midnight.

Representations received after this time will not be considered duly made.

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM4

Document:

Publication Draft Local Plan (February 2018)

Page Number:

Page 26

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Please see supporting representation letter.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

The Local Plan does not provide sufficient housing land to meet a properly formulated assessment of objective need and those sites identified will not deliver the units identified. On the basis of the above we consider that the Local Plan is unsound and will not be effective and therefore does not deliver sustainable development in accordance with national policy.

Please see supporting representation letter for full comments.

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

To make the local plan sound it is recommended that an uplift for market signals and affordable housing need is provided, that an allowance is made for improving headship rates and that the 2014 Projections are used instead of the 2016 Projections. We consider that Policy SS1 and subsequent affected policies are modified to reflect the following:

The OAHN should be 1,150 per annum to allow for a sufficient uplift to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs.

Please see supporting representation letter for full comments.

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To elaborate on our written representation.

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 2018 to inform the Local Plan process. We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't. City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

Signature

Date

19th July 2019

DPP Planning
One Park Row
Leeds
LS1 5HN

info@dppukltd.com
www.dppukltd.com



FREEPOST RTEG-TYYU-KLTZ
Local Plan
City of York Council
West Offices
Station Rise
York
YO1 6GA

19th July 2019

Your ref: 882
Our ref: JB/ML/2411le

Dear Sir / Madam,

COMMENTS ON THE CITY OF YORK LOCAL PLAN PROPOSED MODIFICATIONS CONSULTATION (10TH JUNE 2019 – 22ND JULY 2019) AND IN RESPECT OF LAND AT ASKHAM LANE, ACOMB (HOUSING SITE REF: 882)

Introduction

Thank you for this opportunity to provide further commentary and representation to the City of York Local Plan Proposed Modifications (“the Proposed Modifications”) and its associated evidence base.

This submission is made on behalf of Linden Homes Strategic Land (“the Developer”) and should be read in conjunction with previous detailed representations submitted to the City of York Council (“the Council”), throughout the plan making process which demonstrate that the proposed housing allocation on land at Askham Lane, Acomb (housing site ref: 882) (“the Site”) is suitable for housing development, that is available and that residential development is viable and achievable on the Site.

Cardiff **Leeds** London Manchester Newcastle upon Tyne

DPP One Limited
Company number 08129507
VAT number 138284595

In relation to the Proposed Modifications we have set out the representation under the following headings:

- Background
- The Test of Soundness
- The Proposed Modifications
- Comments and Observations on the Proposed Modifications
- Our Proposed Amendments
- Conclusions

Background

Site 882 was assessed as part of the Council's rigorous selection methodology, during the Preferred Sites Consultation (2016), Pre-Publication Draft Local Plan (Regulation 18 Consultation) and Local Plan Publication Draft (2018). In this regard:

- We have shown that the Site is available and suitable for development and that development is achievable.
- We have shown that the exclusion of the Site from the Green Belt would not harm any of the purposes of including land within the Green Belt.
- We have shown that the Site is sustainably located and its development would accord with the NPPF.
- We have shown that that the Site can accommodate at least 537 houses and that the development would be viable.

The Council's current position is that, due to revisions to the evidence base and notably the proposed reduction in the housing requirement, certain previously proposed allocations have been modified or deleted. This does not mean that these sites or parts of these sites are unsuitable or inappropriate for development. Rather it simply means that the Council now consider that these sites or parts of these sites are less preferable than those sites proposed in the previous draft versions of the local plan.

On the basis of the Council's revised evidence base and the alleged lower housing requirement, the Council have sought to reduce the number of housing allocations.

The Developer objects to the lack of a housing allocation on the Site 882 or in the alternative a safeguarded land allocation. The Developer also objects to the suggested housing requirement and to the lack of a safeguarded land policy. In the alternative to a housing allocation the Developer objects to the lack of a safeguarded land allocation.

The Test of Soundness

Paragraph 182 of the NPPF (2012) indicates that a Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

The Proposed Modifications

Policy SS1 – Delivering Sustainable Growth for York

The City of York Council are proposing to reduce the housing requirement from 867 dwellings per annum to 790 dwellings per annum. The Proposed Modifications largely follow and are consequent upon the amendment to Policy SS1 which sets a need to deliver a minimum annual provision of 790 new dwellings over the plan period to 2032/33 and post plan period to 2037/38.

- | | |
|---------------------------|-----------------------|
| • PM3: Paragraph 2.5 | • PM21a-d: Table 5.2 |
| • PM4: Policy SS1 | • PM22: Paragraph 5.9 |
| • PM5: Explanation to SS1 | • PM44: Table 15.2 |
| • PM20a-d: Figure 5.1 | |

Comments and Observations on the Proposed Modifications

The Proposed Modifications are based on the Housing Needs Update 2019; which was produced by GL Hearn to take into account the 2016-based sub-national population and household projections from ONS and CLG (“the 2016 Projections”).

The 2016 Projections reflect the following:

- Life expectancy will not increase at the same rate as previously.
- International in-migration is not expected to continue at the same rate as previously.
- A reduction in the household formation rates.

On behalf of the Developer we object to the use of the 2016 Projections as a base for the Proposed Modifications. The reasons for this are as follows.

The Ministry of Housing, Communities and Local Government (‘CLG’) published a Technical Consultation on updates to the national planning policy and guidance document in October 2018. The document seeks views on changes to planning practice guidance on the standard method for assessing local housing needs to ensure consistency with the Government’s objective of building more homes.

The document reaffirms the Government’s priority which is to deliver more and better designed homes and this has been a prominent theme in Government documents published over the last 18 months. The document indicates that since the publication of the standard methodology, the base data has changed in that the household projections were produced by CLG but are now supplied by the Office of National Statistics (‘ONS’).

The ONS published the latest household projections on 20th September 2018. These reduce the projected rate of household formation compared to the previous projections (“the 2014 Projections”), and the Government indicates within the document that this results in the national minimum annual housing need calculated using the standard method falling significantly. The numbers have fallen from 269,000 homes (rounded up to 300,000 dwelling per annum) prior to publication, to approximately 213,000 based on the updated data. This now sets the national minimum annual housing need figure to below the 217,350 homes delivered last year.

The paper confirms that the Government has considered whether it needs to change its aspirations for housing supply in light of the new household projections and the paper indicates at paragraph 11 that it has decided that it is not right to change its aspirations. Paragraph 11 gives the following reasons:

- The annual change in household projections comprises two aspects: a reduction of 29,000 arising from the lower population projections, and a reduction of 23,000 arising from changes in the method for converting population change into estimates of household formation – (reducing the historic period of household formation on which the projections are based from five census points to two, which focuses it more acutely on a period of low household formation where the English housing market was not supplying enough additional homes). In this regard the Government considers that methodological changes are not a reason why the Government should change its aspirations.
- Household projections are constrained by housing supply. If new, additional homes are not supplied, then households cannot form as there would be nowhere for them to live.
- The historic under-delivery of housing means there is a case for public policy supporting delivery in excess of household projections, even if those projections fall.
- Other things being equal a more responsive supply of homes through local authorities planning for more homes where we need them will help to address the effects of increasing demand, such as declining affordability, relative to a housing supply that is less responsive.
- The above factors have led to declining affordability, as evidenced by the decrease in the number of people living in an area with an affordability ratio of 4 or less: from 23 million (47% of the population) in 2000, to 395,000 (less than 1% of the population) in 2017. Similarly, there has been an increase in those living in areas with an affordability ratio of more than 8: from 2.8 million (around 6% of the population) to 28 million (nearly 50% of the population) over the same period. This indicates that the Government should not be less ambitious for housing supply.

The Government also concludes that population changes are only one aspect of the driver for housing supply. Rising incomes, changing social preferences and factors such as real interest rates and credit availability contribute to demand for housing.

The paper also refers to the ONS and indicates that the ONS believe that the updated 2016-based household projections do not take into account how many people may want to form new households, but for whatever reason are unable to, such as first-time buyers or people wanting to live on their own instead of a house share. Therefore, this snapshot of past trends is not a measure of how many houses would need to be built to meet housing demand. The ONS confirm that although the projections are lower than previously published, this does not directly mean that fewer houses are needed in the future.

The Government has therefore concluded that there is no need to change its aspirations for increasing housing supply and remain committed to delivering 300,000 dwellings pre-annum.

The Government considers that the best way of responding to the new ONS household projections is to make three changes:

- For the short-term, specify that the 2014-based data will provide the demographic baseline for assessment of local housing need;
- To make clear in national planning practice guidance that lower numbers through the 2016-based projections do not qualify as an exceptional circumstance that justifies departure from the standard methodology; and
- In the longer term, to review the formula with a view to establishing a new method.

This is now reflected in the Planning Practice Guidance (PPG) which indicates that *“any method which relies on using the 2016-based household projections will not be considered to be following the standard method as set out in paragraph 60 of the National Planning Policy Framework. As explained above, it is not considered that these projections provide an appropriate basis for use in the standard method.”* The impact of the 2016 Projections, if applied to a calculation based on an OAHN, is no different to their application under the standard methodology. It is therefore clear from the Governments Technical Consultation and the PPG that the 2016 Projections should not be used.

In conclusion on the use of the 2016 Projections, these show a general decrease in household growth which is at odds with the Government stated aspiration which to increase housing delivery to 300,000 dwellings per annum by the mid-2020s and it is recognised that this will not be achieved if the local planning authorities adopt the 2016 Projections to either calculate their Objective Assessment of Housing Need (“OAHN”) or in utilising the standard method of calculating the Local Housing Need Assessment.

We therefore consider that the evidence base, upon which the Proposed Modifications are formulated, to be unsound in that that it is not positively prepared and does not meet the area’s development needs, it is not justified as it is not the most appropriate strategy and it will not be effective in meeting the City’s needs and is not consistent with national policy.

Notwithstanding our concerns about the use of the 2016 Projections we also have concerns about the City of York Housing Needs Update dated January 2019, specifically we note that the approach taken by GL Hearn in this document is not consistent in its approach to the preparation of the previous SHMA and addendum update (May 2017) also produced by GL Hearn.

In particular we note that:

- The 2017 SHMA recommends that based on their assessment of market signals evidence that York should include a 10% market signals adjustment to the 867 figure. This would increase the housing figure to 953 per annum. The market adjustment is based on an assessment of both market signals and affordable housing need. GL Hearn considered a single adjustment to address both of these issues as they are intrinsically linked. This approach has been abandoned in the City of York Housing Needs Update dated January 2019.
- Despite previously identifying a net affordable housing need of 573 dwellings per annum, the City of York Housing Needs Update dated January 2019 does not reassess this need. It does note at paragraph 4.28 that *“it seems clear from this that the expectation is that it may be necessary, based on the affordable needs evidence to consider an adjustment to enhance the delivery of affordable housing, but that this does not*

need to be done in a 'mechanical way' whereby the affordable need on its own drives the OAN." No uplift to address the affordable housing crisis has however been made.

- Further the City of York Housing Needs Update dated January 2019 notes that market signals show that housing affordability is a worsening issue in York and that house prices have increased in the past year and the affordability ratio between house prices and earnings has also worsened. The City of York Housing Needs Update dated January 2019 indicates that these housing market signals suggest that, in accordance with PPG, an uplift to the demographic projections is appropriate. However, no uplift has again been made.
- We welcome the use of the economic led housing need scenario in the City of York Housing Needs Update dated January 2019. This reflects a positive attitude to growth and accords with one of the basic principles of the NPPF. The scenario considered is 11,050 plus additional jobs over the remaining 17 years of the plan period to 2031 (2014 to 2031). This equates to the creation of 650 new jobs per annum and these new jobs have been converted to a housing requirement. However, the creation of new jobs within the City does not reduce the market signals or the affordable housing crisis. It is plain that the suggested uplift of 15%, as recommended by GL Hearn in the City of York Housing Needs Update dated January 2019, should have been added to the economic led housing need of 790 dwellings per annum.
- As made clear in the City of York Housing Needs Update dated January 2019 the economic led housing need scenario considers the plan period to 2031 (2014 to 2031) whereas the Local Plan provides for development in the period to 2032/2033 and in the post plan period to 2037/2038 to ensure that the Green Belt endures beyond the plan period. The figure of 790 dwellings per annum, which is reflected in the Proposed Modifications, therefore does not address the correct plan period and does not meet the housing need.
- Finally, the figure of 790 dwellings per annum is the need identified in the City of York Housing Needs Update dated January 2019 and this is reflected in the Proposed Modification. The figure of 790 dwellings per annum does not take into account persistent under-delivery.

The findings within the associated evidence bases are contradictory and provide polar opposite results, even though the documents are less than 1 ½ years apart and produced by the same consultant. Further there is little in the way of explanation as to why there has been a change in approach.

We therefore consider that the evidence base, upon which the Proposed Modifications are formulated, to be unsound as the evidence and therefore the plan has not positively prepared and does not meet the area's development needs. It is not justified as it is not the most appropriate strategy and it will not be effective in meeting the City's needs, it is also therefore not consistent with national policy.

Our Proposed Amendments

There are a number of significant deficiencies in the City of York Housing Needs Update which mean that the 790 dwellings per annum OAHN figure currently being pursued by the Council within the Proposed Modifications is unsound. The housing requirement and evidence base are not justified and the local plan will not be effective in meeting the City's needs. It has not been positively prepared and the approach adopted does not reflect Government Guidance.

To make the local plan sound it is recommended that an uplift for market signals and affordable housing need is provided; that an allowance is made for improving headship rates and that the 2014 Projections are used instead of the 2016 Projections.

We consider that Policy SS1 and subsequent affected policies are modified to reflect the following:

- The OAHN should be 1,150 per annum to allow for a sufficient uplift to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs.

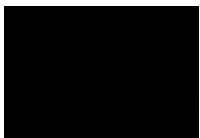
This suggested modification reflects the professional opinion of the property sector and is echoed by the House Building Federation and other parties with a vested interest.

Conclusions

On behalf of the Developer we would like to attend the oral examination, to further progress the soundness of the Plan with regard to supply of housing for the City of York.

Please can we be kept informed of all forthcoming consultations upon the Local Plan and associated documents, by using the contact details provided below for future correspondence.

Yours sincerely,



Mark Lane
Director
DPP One Ltd
Mark.Lane@dppukltd.com



From: localplan@york.gov.uk
Sent: 22 July 2019 15:16
To: localplan@york.gov.uk
Subject: FW: City of York Local Plan Proposed Modifications 2019 - Linden Homes Strategic Land Re H38
Attachments: Final H38 - Land rear of Rufforth Primary School, Rufforth - PM Response....pdf; Final H38 - Land rear of Rufforth Primary School, Rufforth - PM Reps Let....pdf
Follow Up Flag: Follow up
Flag Status: Completed

From: Josh Brear [REDACTED]
Sent: 19 July 2019 17:20
To: localplan@york.gov.uk
Cc: [REDACTED]
Subject: City of York Local Plan Proposed Modifications 2019 - Linden Homes Strategic Land

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

Please find attached representations responding to the City of York Local Plan Proposed Modifications 2019, made on behalf of Linden Homes Strategic Land, having regard to the following sites:

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- Land North of Escrick, Escrick (ref: SF15)
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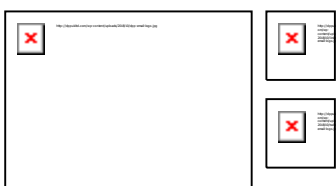
Following receipt of this email, can a member of the Council's Planning Policy team please respond to this email confirming that the representation has been received.

Kind Regards,

Josh

Josh Brear
Senior Planner

■ [REDACTED]
 ■ [REDACTED]
 ■ [REDACTED]



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City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Mark
Last Name		Lane
Organisation (where relevant)		DPP
Representing (if applicable)		Linden Homes Strategic Land
Address – line 1		██████████
Address – line 2		██████
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		██████████
E-mail Address		Mark.Lane@dppukltd.com
Telephone Number		██████████

Representations must be received by Monday 22 July 2019, up until midnight.

Representations received after this time will not be considered duly made.

Guidance note

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Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

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Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM4

Document:

Publication Draft Local Plan (February 2018)

Page Number:

Page 26

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Please see supporting representation letter.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

The Local Plan does not provide sufficient housing land to meet a properly formulated assessment of objective need and those sites identified will not deliver the units identified. On the basis of the above we consider that the Local Plan is unsound and will not be effective and therefore does not deliver sustainable development in accordance with national policy.

Please see supporting representation letter for full comments.

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

To make the local plan sound it is recommended that an uplift for market signals and affordable housing need is provided, that an allowance is made for improving headship rates and that the 2014 Projections are used instead of the 2016 Projections. We consider that Policy SS1 and subsequent affected policies are modified to reflect the following:

The OAHN should be 1,150 per annum to allow for a sufficient uplift to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs.

Please see supporting representation letter for full comments.

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To elaborate on our written representation.

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 2018 to inform the Local Plan process. We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't. City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

Signature



Date

19th July 2019

DPP Planning
One Park Row
Leeds
LS1 5HN

info@dppukltd.com
www.dppukltd.com



FREEPOST RTEG-TYYU-KLTZ
Local Plan
City of York Council
West Offices
Station Rise
York
YO1 6GA

19th July 2019

Your ref: H38
Our ref: JB/ML/2411le

Dear Sir / Madam,

COMMENTS ON THE CITY OF YORK LOCAL PLAN PROPOSED MODIFICATIONS CONSULTATION (10TH JUNE 2019 – 22ND JULY 2019) AND IN RESPECT OF LAND TO THE REAR OF RUFFORTH PRIMARY SCHOOL, RUFFORTH (HOUSING SITE REF: H38)

Introduction

Thank you for this opportunity to provide further commentary and representation to the City of York Local Plan Proposed Modifications (“the Proposed Modifications”) and its associated evidence base.

This submission is made on behalf of the Linden Homes Strategic Land (“Developer”) and should be read in conjunction with previous detailed representations submitted to the City of York Council (“the Council”), throughout the plan making process which demonstrate that the proposed housing allocation on land to the rear of Rufforth Primary School, Rufforth (housing site ref: H38) (“the Site”) is suitable for housing development, that is available and that residential development is viable and achievable on the Site.

Cardiff

Leeds

London

Manchester

Newcastle upon Tyne

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Company number 08129507
VAT number 138284595

In relation to the Proposed Modifications we have set out the representation under the following headings:

- Background
- The Test of Soundness
- The Proposed Modifications
- Comments and Observations on the Proposed Modifications
- Our Proposed Amendments
- Conclusions

Background

Site H38 was assessed as part of the Council's rigorous selection methodology and as a result of passing this process; the Site was proposed as a housing allocation in the Local Plan Preferred Options Draft (2013), Local Plans Working Group Publication (2014), Local Plan Preferred Sites Consultation (2016) and the Local Plan Publication Draft (2018).

The suitability and appropriateness of the Site for housing development is therefore not in question. Furthermore, it has been established in this report and by the Council that residential development on the Site would be achievable and that the Site is available for development. Therefore the principle of allocating the Site for housing within the local plan has been established.

Consequently, the Developer supports the continued allocation of H38 within the local plan.

The Test of Soundness

Paragraph 182 of the NPPF (2012) indicates that a Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

The Proposed Modifications

Policy SS1 – Delivering Sustainable Growth for York

The City of York Council are proposing to reduce the housing requirement from 867 dwellings per annum to 790 dwellings per annum. The Proposed Modifications largely follow and are consequent upon the amendment to Policy SS1 which sets a need to deliver a minimum annual provision of 790 new dwellings over the plan period to 2032/33 and post plan period to 2037/38.

- PM3: Paragraph 2.5
- PM4: Policy SS1
- PM5: Explanation to SS1
- PM20a-d: Figure 5.1
- PM21a-d: Table 5.2
- PM22: Paragraph 5.9
- PM44: Table 15.2

Comments and Observations on the Proposed Modifications

The Proposed Modifications are based on the Housing Needs Update 2019; which was produced by GL Hearn to take into account the 2016-based sub-national population and household projections from ONS and CLG (“the 2016 Projections”).

The 2016 Projections reflect the following:

- Life expectancy will not increase at the same rate as previously.
- International in-migration is not expected to continue at the same rate as previously.
- A reduction in the household formation rates.

The Developer is concerned that using the 2016 Projections as a base for the Proposed Modifications underestimates the housing need in the district, does not take account for the persistent under delivery and does not reflect market signals and as such it will led to further affordability issues and will not deliver the market and affordable homes needed in the City

Our Proposed Amendments

To make the local plan sound it is recommended that an uplift for market signals and affordable housing need is provided, that an allowance is made for improving headship rates and that the 2014 Projections are used instead of the 2016 Projections.

We consider that Policy SS1 and subsequent affected policies are modified to reflect the following:

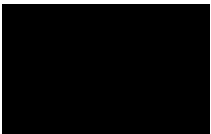
- The OAHN should be 1,150 per annum to allow for a sufficient uplift to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs.

Conclusions

The Council have accepted that H38 is available and that the Site is suitable for residential development and that development can be achieved and as such the Council are proposing to reaffirm the allocation of H38 for residential development and contributing to the soundness of the Plan. The Developer wholly supports the allocation known as H38. The Developer also supports the estimated development capacity of the Site and confirm that this can be delivered in the plan period. However, the Developer is concerned that there are deficiencies in the City of York Housing Needs Update which means that the 790 dwellings per annum OAHN figure currently being pursued by the Council within the Proposed Modifications are unsound in that the housing requirement and evidence base are not justified, it will not be effective in meeting the Cities needs and the local plan has not been positively prepared and the approach adopted does not reflect Government Guidance.

Please can we be kept informed of all forthcoming consultations upon the local plan and associated documents, by using the contact details provided below for future correspondence.

Yours sincerely,



Mark Lane
Director
DPP One Ltd
Mark.Lane@dppukltd.com



[Redacted]

From: localplan@york.gov.uk
Sent: 22 July 2019 15:12
To: localplan@york.gov.uk
Subject: FW: City of York Local Plan Proposed Modifications 2019 - Linden Homes Strategic Land Re ST9

Attachments: Final ST9 - Land North of Haxby, Haxby - PM Repls Letter 2019 - Linden Ho....pdf; Final ST9 - Land North of Haxby, Haxby - PM Response Form 2019 - Lindenpdf

Follow Up Flag: Follow up
Flag Status: Completed

From: Josh Brear [Redacted]
Sent: 19 July 2019 17:20
To: localplan@york.gov.uk
Cc: [Redacted]
Subject: City of York Local Plan Proposed Modifications 2019 - Linden Homes Strategic Land

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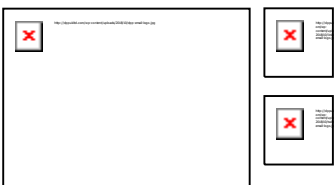
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Senior Planner

■ [Redacted]
 ■ [Redacted]
 ■ [Redacted]



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1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Mark
Last Name		Lane
Organisation (where relevant)		DPP
Representing (if applicable)		Linden Homes Strategic Land
Address – line 1		██████████
Address – line 2		██████
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		██████████
E-mail Address		Mark.Lane@dppukltd.com
Telephone Number		██████████

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Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

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All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM4

Document:

Publication Draft Local Plan (February 2018)

Page Number:

Page 26

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Please see supporting representation letter.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared **Justified**

Effective **Consistent with national policy**

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

The Local Plan does not provide sufficient housing land to meet a properly formulated assessment of objective need and those sites identified will not deliver the units identified. On the basis of the above we consider that the Local Plan is unsound and will not be effective and therefore does not deliver sustainable development in accordance with national policy.

Please see supporting representation letter for full comments.

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

To make the local plan sound it is recommended that an uplift for market signals and affordable housing need is provided, that an allowance is made for improving headship rates and that the 2014 Projections are used instead of the 2016 Projections. We consider that Policy SS1 and subsequent affected policies are modified to reflect the following:

The OAHN should be 1,150 per annum to allow for a sufficient uplift to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs.

Please see supporting representation letter for full comments.

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To elaborate on our written representation.

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

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Storing your information and contacting you in the future:

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Signature



Date

19th July 2019

DPP Planning
One Park Row
Leeds
LS1 5HN

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www.dppukltd.com



FREEPOST RTEG-TYYU-KLTZ
Local Plan
City of York Council
West Offices
Station Rise
York
YO1 6GA

19th July 2019

Your ref: ST9
Our ref: JB/ML/2411le

Dear Sir / Madam,

COMMENTS ON THE CITY OF YORK LOCAL PLAN PROPOSED MODIFICATIONS CONSULTATION (10TH JUNE 2019 – 22ND JULY 2019) AND IN RESPECT OF LAND NORTH OF HAXBY, HAXBY (STRATEGIC HOUSING SITE REF: ST9)

Introduction

Thank you for this opportunity to provide further commentary and representation to the City of York Local Plan Proposed Modifications (“the Proposed Modifications”) and its associated evidence base.

This submission is made on behalf of the Linden Homes Strategic Land (“Developer”) and should be read in conjunction with previous detailed representations submitted to the City of York Council (“the Council”), throughout the plan making process which demonstrate that the proposed housing allocation on land North of Haxby, Haxby (strategic housing site ref: ST9) (“the Site”) is suitable for housing development, that is available and that residential development is viable and achievable on the Site.

DPP One Limited
Company number 08129507
VAT number 138284595

Cardiff **Leeds** London Manchester Newcastle upon Tyne

In relation to the Proposed Modifications we have set out the representation under the following headings:

- Background
- The Test of Soundness
- The Proposed Modifications
- Comments and Observations on the Proposed Modifications
- Our Proposed Amendments
- Conclusions

Background

Site ST9 was assessed as part of the Council's rigorous selection methodology and as a result of passing this process; the Site was proposed as a housing allocation in the Local Plan Preferred Options Draft (2013), Local Plans Working Group Publication (2014), Local Plan Preferred Sites Consultation (2016) and the Local Plan Publication Draft (2018).

The suitability and appropriateness of the Site for housing development is therefore not in question. Furthermore, it has been established in this report and by the Council that residential development on the Site would be achievable and that the Site is available for development. Therefore the principle of allocating the Site for housing within the local plan has been established.

Consequently, the Developer supports the continued allocation of ST9 within the local plan.

The Test of Soundness

Paragraph 182 of the NPPF (2012) indicates that a Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

The Proposed Modifications

Policy SS1 – Delivering Sustainable Growth for York

The City of York Council are proposing to reduce the housing requirement from 867 dwellings per annum to 790 dwellings per annum. The Proposed Modifications largely follow and are consequent upon the amendment to Policy SS1 which sets a need to deliver a minimum annual provision of 790 new dwellings over the plan period to 2032/33 and post plan period to 2037/38.

- PM3: Paragraph 2.5
- PM4: Policy SS1
- PM5: Explanation to SS1
- PM20a-d: Figure 5.1
- PM21a-d: Table 5.2
- PM22: Paragraph 5.9
- PM44: Table 15.2

Comments and Observations on the Proposed Modifications

The Proposed Modifications are based on the Housing Needs Update 2019; which was produced by GL Hearn to take into account the 2016-based sub-national population and household projections from ONS and CLG (“the 2016 Projections”).

The 2016 Projections reflect the following:

- Life expectancy will not increase at the same rate as previously.
- International in-migration is not expected to continue at the same rate as previously.
- A reduction in the household formation rates.

The Developer is concerned that using the 2016 Projections as a base for the Proposed Modifications underestimates the housing need in the district, does not take account for the persistent under delivery and does not reflect market signals and as such it will led to further affordability issues and will not deliver the market and affordable homes needed in the City

Our Proposed Amendments

To make the local plan sound it is recommended that an uplift for market signals and affordable housing need is provided, that an allowance is made for improving headship rates and that the 2014 Projections are used instead of the 2016 Projections.

We consider that Policy SS1 and subsequent affected policies are modified to reflect the following:

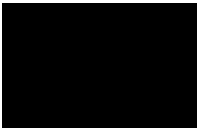
- The OAHN should be 1,150 per annum to allow for a sufficient uplift to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs.

Conclusions

The Council have accepted that ST9 is available and that the Site is suitable for residential development and that development can be achieved and as such the Council are proposing to reaffirm the allocation of ST9 for residential development and contributing to the soundness of the Plan. The Developer wholly supports the allocation known as ST9. The Developer also supports the estimated development capacity of the Site and confirm that this can be delivered in the plan period. However, the Developer is concerned that there are deficiencies in the City of York Housing Needs Update which means that the 790 dwellings per annum OAHN figure currently being pursued by the Council within the Proposed Modifications are unsound in that the housing requirement and evidence base are not justified, it will not be effective in meeting the Cities needs and the local plan has not been positively prepared and the approach adopted does not reflect Government Guidance.

Please can we be kept informed of all forthcoming consultations upon the local plan and associated documents, by using the contact details provided below for future correspondence.

Yours sincerely,



Mark Lane
Director
DPP One Ltd
Mark.Lane@dppukltd.com



[Redacted]

From: localplan@york.gov.uk
Sent: 22 July 2019 15:10
To: localplan@york.gov.uk
Subject: FW: City of York Local Plan Proposed Modifications 2019 - Linden Homes Strategic Land Re SF15

Attachments: Final SF15 - Land North of Escrick - PM Response Form 2019.pdf; Final SF15 - Land North of Escrick - PM Repls Letter 2019.pdf

Follow Up Flag: Follow up
Flag Status: Completed

From: Josh Brear [Redacted]
Sent: 19 July 2019 17:20
To: localplan@york.gov.uk
Cc: [Redacted]
Subject: City of York Local Plan Proposed Modifications 2019 - Linden Homes Strategic Land

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

Please find attached representations responding to the City of York Local Plan Proposed Modifications 2019, made on behalf of Linden Homes Strategic Land, having regard to the following sites:

- Land North of Haxby, Haxby (ref: SF4)
- Land North of Escrick, Escrick (ref: SF15)
- Land North of Haxby, Haxby (ref: ST9)
- Land rear of Rufforth Primary School, Rufforth (ref: H38)
- Land at Askham Lane, Acomb (ref: 882)

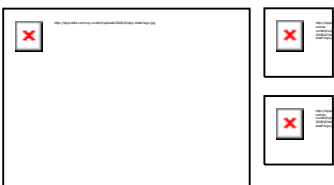
Following receipt of this email, can a member of the Council’s Planning Policy team please respond to this email confirming that the representation has been received.

Kind Regards,

Josh

Josh Brear
Senior Planner

■ [Redacted]
■ [Redacted]
■ [Redacted]



This email (and any attachments) is confidential and may be privileged. It is intended solely for the addressee. If you have received it in error, please contact us immediately. Any disclosure, copying, distribution or action taken as a result of this email is prohibited and may be unlawful.

Warning: Whilst we believe this email and any attachment are free of any virus or other defect which might affect your system it is your responsibility to ensure that this is so. We accept no liability for any loss or damage caused in any way by its receipt or use.

If you do not wish to receive emails from DPP one Ltd please unsubscribe by emailing: unsubscribe@dppukltd.com

City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make.

Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Mark
Last Name		Lane
Organisation (where relevant)		DPP
Representing (if applicable)		Linden Homes Strategic Land
Address – line 1		██████████
Address – line 2		██████
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		██████████
E-mail Address		Mark.Lane@dppukltd.com
Telephone Number		██████████

Representations must be received by Monday 22 July 2019, up until midnight.

Representations received after this time will not be considered duly made.

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

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What can I make comments on?

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM4

Document:

Publication Draft Local Plan (February 2018)

Page Number:

Page 26

What does 'legally compliant' mean?

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4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Please see supporting representation letter.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

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Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared **Justified**

Effective **Consistent with national policy**

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The Local Plan does not provide sufficient housing land to meet a properly formulated assessment of objective need and those sites identified will not deliver the units identified. On the basis of the above we consider that the Local Plan is unsound and will not be effective and therefore does not deliver sustainable development in accordance with national policy.

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7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

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Signature



Date

19th July 2019

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www.dppukltd.com



FREEPOST RTEG-TYYU-KLTZ
Local Plan
City of York Council
West Offices
Station Rise
York
YO1 6GA

19th July 2019

Your ref: SF15
Our ref: JB/ML/2411le

Dear Sir / Madam,

COMMENTS ON THE CITY OF YORK LOCAL PLAN PROPOSED MODIFICATIONS CONSULTATION (10TH JUNE 2019 – 22ND JULY 2019) AND IN RESPECT OF LAND NORTH OF ESCRICK (SAFEGUARDED LAND SITE REF: SF15)

Introduction

Thank you for this opportunity to provide further commentary and representation to the City of York Local Plan Proposed Modifications (“the Proposed Modifications”) and its associated evidence base.

This submission is made on behalf of Linden Homes Strategic Land (“the Developer”) and should be read in conjunction with previous detailed representations submitted to the City of York Council (“the Council”), throughout the plan making process which demonstrate that the proposed housing allocation on land North of Escrick (safeguarded land ref: SF15) (“the Site”) is suitable for housing development, that is available and that residential development is viable and achievable on the Site.

Cardiff

Leeds

London

Manchester

Newcastle upon Tyne

DPP One Limited
Company number 08129507
VAT number 138284595

In relation to the Proposed Modifications we have set out the representation under the following headings:

- Background
- The Test of Soundness
- The Proposed Modifications
- Comments and Observations on the Proposed Modifications
- Our Proposed Amendments
- Conclusions

Background

Site SF15 was assessed as part of the Council's rigorous selection methodology and as a result of passing this process; the Site was proposed as safeguarded land within the Preferred Options Draft (2013) and the Local Plans Working Group Publication Draft (2014) versions of the local plan. In this regard the Council must have previously satisfied themselves that the Site is available, suitable for development and the development is achievable at the point in time when the Site is intended to deliver development.

The Council's current position is that, due to revisions to the evidence base and notably the proposed reduction in the housing requirement, certain previously proposed allocations have been modified or deleted. This does not mean that these sites or parts of these sites are unsuitable or inappropriate for development. Rather it simply means that the Council now consider that these sites or parts of these sites are less preferable than those sites proposed in the previous draft versions of the local plan.

On the basis of the Council's revised evidence base and the alleged lower housing requirement, the Council have sought to reduce the number of housing allocations and safeguarded land; the Council have therefore removed safeguarded land from the local plan, including SF15.

The Developer objects to the deletion of SF15.

The Test of Soundness

Paragraph 182 of the NPPF (2012) indicates that a Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

The Proposed Modifications

Policy SS1 – Delivering Sustainable Growth for York

The City of York Council are proposing to reduce the housing requirement from 867 dwellings per annum to 790 dwellings per annum. The Proposed Modifications largely follow and are consequent upon the amendment to Policy SS1 which sets a need to deliver a minimum annual provision of 790 new dwellings over the plan period to 2032/33 and post plan period to 2037/38.

- PM3: Paragraph 2.5
- PM4: Policy SS1
- PM5: Explanation to SS1
- PM20a-d: Figure 5.1
- PM21a-d: Table 5.2
- PM22: Paragraph 5.9
- PM44: Table 15.2

Comments and Observations on the Proposed Modifications

The Proposed Modifications are based on the Housing Needs Update 2019; which was produced by GL Hearn to take into account the 2016-based sub-national population and household projections from ONS and CLG (“the 2016 Projections”).

The 2016 Projections reflect the following:

- Life expectancy will not increase at the same rate as previously.
- International in-migration is not expected to continue at the same rate as previously.
- A reduction in the household formation rates.

On behalf of the Developer we object to the use of the 2016 Projections as a base for the Proposed Modifications. The reasons for this are as follows.

The Ministry of Housing, Communities and Local Government (‘CLG’) published a Technical Consultation on updates to the national planning policy and guidance document in October 2018. The document seeks views on changes to planning practice guidance on the standard method for assessing local housing needs to ensure consistency with the Government’s objective of building more homes.

The document reaffirms the Government’s priority which is to deliver more and better designed homes and this has been a prominent theme in Government documents published over the last 18 months. The document indicates that since the publication of the standard methodology, the base data has changed in that the household projections were produced by CLG but are now supplied by the Office of National Statistics (‘ONS’).

The ONS published the latest household projections on 20th September 2018. These reduce the projected rate of household formation compared to the previous projections (“the 2014 Projections”), and the Government indicates within the document that this results in the national minimum annual housing need calculated using the standard method falling significantly. The numbers have fallen from 269,000 homes (rounded up to 300,000 dwelling per

annum) prior to publication, to approximately 213,000 based on the updated data. This now sets the national minimum annual housing need figure to below the 217,350 homes delivered last year.

The paper confirms that the Government has considered whether it needs to change its aspirations for housing supply in light of the new household projections and the paper indicates at paragraph 11 that it has decided that it is not right to change its aspirations. Paragraph 11 gives the following reasons:

- The annual change in household projections comprises two aspects: a reduction of 29,000 arising from the lower population projections, and a reduction of 23,000 arising from changes in the method for converting population change into estimates of household formation – (reducing the historic period of household formation on which the projections are based from five census points to two, which focuses it more acutely on a period of low household formation where the English housing market was not supplying enough additional homes). In this regard the Government considers that methodological changes are not a reason why the Government should change its aspirations.
- Household projections are constrained by housing supply. If new, additional homes are not supplied, then households cannot form as there would be nowhere for them to live.
- The historic under-delivery of housing means there is a case for public policy supporting delivery in excess of household projections, even if those projections fall.
- Other things being equal a more responsive supply of homes through local authorities planning for more homes where we need them will help to address the effects of increasing demand, such as declining affordability, relative to a housing supply that is less responsive.
- The above factors have led to declining affordability, as evidenced by the decrease in the number of people living in an area with an affordability ratio of 4 or less: from 23 million (47% of the population) in 2000, to 395,000 (less than 1% of the population) in 2017. Similarly, there has been an increase in those living in areas with an affordability ratio of more than 8: from 2.8 million (around 6% of the population) to 28 million (nearly 50% of the population) over the same period. This indicates that the Government should not be less ambitious for housing supply.

The Government also concludes that population changes are only one aspect of the driver for housing supply. Rising incomes, changing social preferences and factors such as real interest rates and credit availability contribute to demand for housing.

The paper also refers to the ONS and indicates that the ONS believe that the updated 2016-based household projections do not take into account how many people may want to form new households, but for whatever reason are unable to, such as first-time buyers or people wanting to live on their own instead of a house share. Therefore, this snapshot of past trends is not a measure of how many houses would need to be built to meet housing demand. The ONS confirm that although the projections are lower than previously published, this does not directly mean that fewer houses are needed in the future.

The Government has therefore concluded that there is no need to change its aspirations for increasing housing supply and remain committed to delivering 300,000 dwellings pre-annum.

The Government considers that the best way of responding to the new ONS household projections is to make three changes:

- For the short-term, specify that the 2014-based data will provide the demographic baseline for assessment of local housing need;
- To make clear in national planning practice guidance that lower numbers through the 2016-based projections do not qualify as an exceptional circumstance that justifies departure from the standard methodology; and
- In the longer term, to review the formula with a view to establishing a new method.

This is now reflected in the Planning Practice Guidance (PPG) which indicates that *“any method which relies on using the 2016-based household projections will not be considered to be following the standard method as set out in paragraph 60 of the National Planning Policy Framework. As explained above, it is not considered that these projections provide an appropriate basis for use in the standard method.”* The impact of the 2016 Projections, if applied to a calculation based on an OAHN, is no different to their application under the standard methodology. It is therefore clear from the Governments Technical Consultation and the PPG that the 2016 Projections should not be used.

In conclusion on the use of the 2016 Projections, these show a general decrease in household growth which is at odds with the Government stated aspiration which to increase housing delivery to 300,000 dwellings per annum by the mid-2020s and it is recognised that this will not be achieved if the local planning authorities adopt the 2016 Projections to either calculate their Objective Assessment of Housing Need (“OAHN”) or in utilising the standard method of calculating the Local Housing Need Assessment.

We therefore consider that the evidence base, upon which the Proposed Modifications are formulated, to be unsound in that that it is not positively prepared and does not meet the area’s development needs, it is not justified as it is not the most appropriate strategy and it will not be effective in meeting the City’s needs and is not consistent with national policy.

Notwithstanding our concerns about the use of the 2016 Projections we also have concerns about the City of York Housing Needs Update dated January 2019, specifically we note that the approach taken by GL Hearn in this document is not consistent in its approach to the preparation of the previous SHMA and addendum update (May 2017) also produced by GL Hearn.

In particular we note that:

- The 2017 SHMA recommends that based on their assessment of market signals evidence that York should include a 10% market signals adjustment to the 867 figure. This would increase the housing figure to 953 per annum. The market adjustment is based on an assessment of both market signals and affordable housing need. GL Hearn considered a single adjustment to address both of these issues as they are intrinsically linked. This approach has been abandoned in the City of York Housing Needs Update dated January 2019.
- Despite previously identifying a net affordable housing need of 573 dwellings per annum, the City of York Housing Needs Update dated January 2019 does not reassess this need. It does note at paragraph 4.28 that *“it seems clear from this that the expectation is that it may be necessary, based on the affordable needs evidence to consider an adjustment to enhance the delivery of affordable housing, but that this does not need to be done in a ‘mechanical way’ whereby the affordable need on its own drives the OAN.”* No uplift to address the affordable housing crisis has however been made.
- Further the City of York Housing Needs Update dated January 2019 notes that market signals show that housing affordability is a worsening issue in York and that house prices have increased in the past year and the affordability ratio between house prices and earnings has also worsened. The City of York Housing Needs

Update dated January 2019 indicates that these housing market signals suggest that, in accordance with PPG, an uplift to the demographic projections is appropriate. However, no uplift has again been made.

- We welcome the use of the economic led housing need scenario in the City of York Housing Needs Update dated January 2019. This reflects a positive attitude to growth and accords with one of the basic principles of the NPPF. The scenario considered is 11,050 plus additional jobs over the remaining 17 years of the plan period to 2031 (2014 to 2031). This equates to the creation of 650 new jobs per annum and these new jobs have been converted to a housing requirement. However, the creation of new jobs within the City does not reduce the market signals or the affordable housing crisis. It is plain that the suggested uplift of 15%, as recommended by GL Hearn in the City of York Housing Needs Update dated January 2019, should have been added to the economic led housing need of 790 dwellings per annum.
- As made clear in the City of York Housing Needs Update dated January 2019 the economic led housing need scenario considers the plan period to 2031 (2014 to 2031) whereas the Local Plan provides for development in the period to 2032/2033 and in the post plan period to 2037/2038 to ensure that the Green Belt endures beyond the plan period. The figure of 790 dwellings per annum, which is reflected in the Proposed Modifications, therefore does not address the correct plan period and does not meet the housing need.
- Finally, the figure of 790 dwellings per annum is the need identified in the City of York Housing Needs Update dated January 2019 and this is reflected in the Proposed Modification. The figure of 790 dwellings per annum does not take into account persistent under-delivery.

The findings within the associated evidence bases are contradictory and provide polar opposite results, even though the documents are less than 1 ½ years apart and produced by the same consultant. Further there is little in the way of explanation as to why there has been a change in approach.

We therefore consider that the evidence base, upon which the Proposed Modifications are formulated, to be unsound as the evidence and therefore the plan has not positively prepared and does not meet the area's development needs. It is not justified as it is not the most appropriate strategy and it will not be effective in meeting the City's needs, it is also therefore not consistent with national policy.

Our Proposed Amendments

There are a number of significant deficiencies in the City of York Housing Needs Update which mean that the 790 dwellings per annum OAHN figure currently being pursued by the Council within the Proposed Modifications is unsound. The housing requirement and evidence base are not justified and the local plan will not be effective in meeting the City's needs. It has not been positively prepared and the approach adopted does not reflect Government Guidance.

To make the local plan sound it is recommended that an uplift for market signals and affordable housing need is provided; that an allowance is made for improving headship rates and that the 2014 Projections are used instead of the 2016 Projections.

We consider that Policy SS1 and subsequent affected policies are modified to reflect the following:

- The OAHN should be 1,150 per annum to allow for a sufficient uplift to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs.

This suggested modification reflects the professional opinion of the property sector and is echoed by the House Building Federation and other parties with a vested interest.

Conclusions

On behalf of the Developer we would like to attend the oral examination, to further progress the soundness of the Plan with regard to supply of housing for the City of York.

Please can we be kept informed of all forthcoming consultations upon the Local Plan and associated documents, by using the contact details provided below for future correspondence.

Yours sincerely,



Mark Lane
Director
DPP One Ltd
Mark.Lane@dppukltd.com



From: Josh Brear [REDACTED]
Sent: 19 July 2019 11:34
To: localplan@york.gov.uk
Cc: Mark Lane
Subject: ST13 Land at Moor Lane, Copmanthorpe - City of York Local Plan Proposed Modifications 2019
Attachments: Final ST13 - Moor Lane, Copmanthorpe - PM Reps Letter 2019.pdf; Final ST13 - Moor Lane, Copmanthorpe - PM Response Form 2019.pdf
Follow Up Flag: Follow up
Flag Status: Completed

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

Please find attached a representation made on behalf of the Shepherd Group for land at Moor Lane, Copmanthorpe (ref: ST13), responding to the City of York Local Plan Proposed Modifications 2019.

Following receipt of this email, can a member of the Council’s Planning Policy team please respond to this email confirming that the representation has been received.

Kind Regards,

Josh

Josh Brear
Senior Planner

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]



Cardiff | Leeds | London | Manchester | Newcastle upon Tyne

This email (and any attachments) is confidential and may be privileged. It is intended solely for the addressee. If you have received it in error, please contact us immediately. Any disclosure, copying, distribution or action taken as a result of this email is prohibited and may be unlawful.

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City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make.

Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Mark
Last Name		Lane
Organisation (where relevant)		DPP
Representing (if applicable)		Shepherd Group
Address – line 1		1 Park Row
Address – line 2		Leeds
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		LS1 5HN
E-mail Address		Mark.Lane@dppukltd.com
Telephone Number		0113 819 7281

Representations must be received by Monday 22 July 2019, up until midnight.

Representations received after this time will not be considered duly made.

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM4

Document:

Publication Draft Local Plan (February 2018)

Page Number:

Page 26

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Please see supporting representation letter.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

The Local Plan does not provide sufficient housing land to meet a properly formulated assessment of objective need and those sites identified will not deliver the units identified. On the basis of the above we consider that the Local Plan is unsound and will not be effective and therefore does not deliver sustainable development in accordance with national policy.

Please see supporting representation letter for full comments.

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

To make the local plan sound it is recommended that an uplift for market signals and affordable housing need is provided, that an allowance is made for improving headship rates and that the 2014 Projections are used instead of the 2016 Projections. We consider that Policy SS1 and subsequent affected policies are modified to reflect the following:

The OAHN should be 1,150 per annum to allow for a sufficient uplift to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs.

Please see supporting representation letter for full comments.

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To elaborate on our written representation.

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 2018 to inform the Local Plan process. We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't. City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

Signature



Date

19th July 2019

DPP Planning
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www.dppukltd.com



FREEPOST RTEG-TYYU-KLTZ
Local Plan
City of York Council
West Offices
Station Rise
York
YO1 6GA

19th July 2019

Your ref: ST13
Our ref: JB/ML/2411le

Dear Sir / Madam,

COMMENTS ON THE CITY OF YORK LOCAL PLAN PROPOSED MODIFICATIONS CONSULTATION (10TH JUNE 2019 – 22ND JULY 2019) AND IN RESPECT OF LAND OFF MOOR LANE, COPMANTHORPE (STRATEGIC HOUSING SITE REF: ST13)

Introduction

Thank you for this opportunity to provide further commentary and representation to the City of York Local Plan Proposed Modifications (“the Proposed Modifications”) and its associated evidence base.

This submission is made on behalf of the Shepherd Group (“Developer”) and should be read in conjunction with previous detailed representations submitted to the City of York Council (“the Council”), throughout the plan making process which demonstrate that the proposed housing allocation on land off Moor Lane, Copmanthorpe (strategic

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Newcastle upon Tyne

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housing site ref: ST13) (“the Site”) is suitable for housing development, that is available and that residential development is viable and achievable on the Site.

In relation to the Proposed Modifications we have set out the representation under the following headings:

- Background
- The Test of Soundness
- The Proposed Modifications
- Comments and Observations on the Proposed Modifications
- Our Proposed Amendments
- Conclusions

Background

Site ST13 was assessed as part of the Council’s rigorous site selection methodology and as a result of passing this process; the Site was a proposed as a housing allocation in the Preferred Options Draft (2013) and the Local Plans Working Group Publication (2014) versions of the Local Plan. In this regard the Council must have previously satisfied themselves that the Site is available, that the Site is suitable for development and the development is achievable at the point in time when the Site is intended to deliver development.

The Council current position is that, due to revisions to the evidence base and notably the proposed reduction in the housing requirement, certain previously proposed allocations have been modified or deleted. This does not mean that these sites or parts of these sites are unsuitable or inappropriate for development. Rather it simply means that the Council now consider that these sites or parts of these sites are less preferable than those sites proposed in the Submission Draft (2018) version of the Local Plan.

On the basis of the Council’s revised evidence base and the alleged lower housing requirement, the Council have sought to reduce the number of housing allocations and one of those sites that the Council have deleted from the Submission Draft (2018) version of the Local Plan is ST13.

The Test of Soundness

Paragraph 182 of the NPPF (2012) indicates that a Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
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Policy SS1 – Delivering Sustainable Growth for York

The City of York Council are proposing to reduce the housing requirement from 867 dwellings per annum to 790 dwellings per annum. The Proposed Modifications largely follow and are consequent upon the amendment to Policy SS1 which sets a need to deliver a minimum annual provision of 790 new dwellings over the plan period to 2032/33 and post plan period to 2037/38.

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Comments and Observations on the Proposed Modifications

The Proposed Modifications are based on the Housing Needs Update 2019; which was produced by GL Hearn to take into account the 2016-based sub-national population and household projections from ONS and CLG (“the 2016 Projections”).

The 2016 Projections reflect the following:

- Life expectancy will not increase at the same rate as previously.
- International in-migration is not expected to continue at the same rate as previously.
- A reduction in the household formation rates.

On behalf of the Developer we object to the use of the 2016 Projections as a base for the Proposed Modifications. The reasons for this are as follows.

The Ministry of Housing, Communities and Local Government (‘CLG’) published a Technical Consultation on updates to the national planning policy and guidance document in October 2018. The document seeks views on changes to planning practice guidance on the standard method for assessing Local Housing Needs to ensure consistency with the Government’s objective of building more homes.

The document reaffirms the Government’s priority which is to deliver more and better designed homes and this has been a prominent theme in Government documents published over the last 18 months. The document indicates that since the publication of standard methodology, the base data has changed in that the household projections were produced by CLG but are now supplied by the Office of National Statistics (‘ONS’).

The ONS published the latest household projections on 20th September 2018. These reduce the projected rate of household formation compared to the previous projections (“the 2014 Projections”), and the Government indicates within the document that this results in the national minimum annual housing need calculated using the standard method falling significantly. The numbers have fallen from 269,000 homes (rounded up to 300,000 dwelling per

annum) prior to publication, to approximately 213,000 based on the updated data. This now sets the national minimum annual housing need figure to below the 217,350 homes delivered last year.

The paper confirms that the Government has considered whether it needs to change its aspirations for housing supply in light of the new household projections and the paper indicates at paragraph 11 that it has decided that it is not right to change its aspirations. Paragraph 11 gives the following reasons:

- The annual change in household projections comprises two aspects: a reduction of 29,000 arising from the lower population projections, and a reduction of 23,000 arising from changes in the method for converting population change into estimates of household formation – (reducing the historic period of household formation on which the projections are based from five census points to two, which focuses it more acutely on a period of low household formation where the English housing market was not supplying enough additional homes). In this regard the Government considers that methodological changes are not a reason why the Government should change its aspirations.
- Household projections are constrained by housing supply. If new, additional homes are not supplied, then households cannot form as there would be nowhere for them to live.
- The historic under-delivery of housing means there is a case for public policy supporting delivery in excess of household projections, even if those projections fall.
- Other things being equal a more responsive supply of homes through local authorities planning for more homes where we need them will help to address the effects of increasing demand, such as declining affordability, relative to a housing supply that is less responsive.
- The above factors have led to declining affordability, as evidenced by the decrease in the number of people living in an area with an affordability ratio of 4 or less: from 23 million (47% of the population) in 2000, to 395,000 (less than 1% of the population) in 2017. Similarly, there has been an increase in those living in areas with an affordability ratio of more than 8: from 2.8 million (around 6% of the population) to 28 million (nearly 50% of the population) over the same period. This indicates that the Government should not be less ambitious for housing supply.

The Government also concludes that population changes are only one aspect of the driver for housing supply. Rising incomes, changing social preferences and factors such as real interest rates and credit availability contribute to demand for housing.

The paper also refers to the ONS and indicates that the ONS believe that the updated 2016-based household projections do not take into account how many people may want to form new households, but for whatever reason are unable to, such as first-time buyers or people wanting to live on their own instead of a house share. Therefore, this snapshot of past trends is not a measure of how many houses would need to be built to meet housing demand. The ONS confirm that although the projections are lower than previously published, this does not directly mean that fewer houses are needed in the future.

The Government has therefore concluded that there is no need to change its aspirations for increasing housing supply and remain committed to delivering 300,000 dwellings pre-annum.

The Government considers that the best way of responding to the new ONS household projections is to make three changes:

- For the short-term, specify that the 2014-based data will provide the demographic baseline for assessment of local housing need;
- To make clear in national planning practice guidance that lower numbers through the 2016-based projections do not qualify as an exceptional circumstance that justifies departure from the standard methodology; and
- In the longer term, to review the formula with a view to establishing a new method.

This is now reflected in the Planning Practice Guidance (PPG) which indicates that *“any method which relies on using the 2016-based household projections will not be considered to be following the standard method as set out in paragraph 60 of the National Planning Policy Framework. As explained above, it is not considered that these projections provide an appropriate basis for use in the standard method.”* The impact of the 2016 Projections, if applied to a calculation based on an OAHN, is no different to their application under the standard methodology. It is therefore clear from the Governments Technical Consultation and the PPG that the 2016 Projections should not be used.

In conclusion on the use of the 2016 Projections these show a general decrease in household growth which is at odds with the Government stated aspiration which to increase housing delivery to 300,000 dwellings per annum by the mid-2020s and it is recognised that this will not be achieved if the local planning authorities adopt the 2016 Projections to either calculate their Objective Assessment of Housing Need (“OAHN”) or in utilising the standard method of calculating the Local Housing Need Assessment.

We therefore consider that the evidence base, upon which the Proposed Modifications are formulated, to be unsound in that that it is not positively prepared and does not meet the areas development needs, it is not justified as it is not the most appropriate strategy and it will not be effective in meeting the Cities needs and is not consistent with national policy.

Notwithstanding our concerns about the use of the 2016 Projections we also have concerns about the City of York Housing Needs Update dated January 2019 specifically we note that the approach taken by GL Hearn within the City of York Housing Needs Update is not consistent in its approach to the preparation of the previous SHMA and addendum update (May 2017) also produced by GL Hearn.

In particular we note that:

- The SHMA 2017 report recommends that based on their assessment of market signals evidence that York should include a 10% market signals adjustment to the 867 figure. This would increase the housing figure to 953 per annum. The market adjustment is based on an assessment of both market signals and affordable housing need. GL Hearn has considered a single adjustment to address both of these issues as they are intrinsically linked. This approach has been abandoned in the City of York Housing Needs Update dated January 2019.
- Despite previously identifying a net affordable housing need of 573 dwellings per annum the City of York Housing Needs Update dated January 2019 does not reassess this need. It does note at paragraph 4.28 that *“it seems clear from this that the expectation is that it may be necessary, based on the affordable needs evidence to consider an adjustment to enhance the delivery of affordable housing, but that this does not need to be done in a ‘mechanical way’ whereby the affordable need on its own drives the OAN.”* No uplift to address the affordable housing crisis has however been made.
- Further the City of York Housing Needs Update dated January 2019 notes that market signals show that housing affordability is a worsening issue in York and that house prices have increased in the past year and

the affordability ratio between house prices and earnings has also worsened. The City of York Housing Needs Update dated January 2019 indicates that these housing market signals suggest that, in accordance with PPG, an uplift to the demographic projections is appropriate. However, no uplift has again been made.

- We welcome the use of the economic led housing need scenerio in the City of York Housing Needs Update dated January 2019. This reflects a positive attitude to growth and accords with one of the basic principles of the NPPF. The scenario considered is 11,050 plus additional jobs over the remaining 17 years of the plan period to 2031 (2014 to 2031). This equates to the creation of 650 new jobs per annum and these new jobs have been converted to a housing requirement. However, the creation of new jobs within the City does not reduce the market signals or the affordable housing crisis. It is plain that the suggested uplift of 15%, as recommended by GL Hearn in the City of York Housing Needs Update dated January 2019, should have been added to the economic led housing need of 790 dwellings per annum.
- As made clear in the City of York Housing Needs Update dated January 2019 the economic led housing need scenario considers the plan period to 2031 (2014 to 2031) whereas the Local Plan provides for development in the period to 2032/2033 and in the post plan period to 2037/2028 to ensure that the Green Belt remains permanent. The figure of 790 dwellings per annum, which is reflected in the Proposed Modifications, therefore plainly does not address the correct plan period and therefore it does meet the housing need.
- Final, the figure of 790 dwellings per annum is the need identified in the City of York Housing Needs Update dated January 2019 City of York Council and this is reflected in the Proposed Modification. The figure of 790 dwellings per annum does not take into account persistent under delivered.

The findings within the associated evidence bases are contradictory and polar opposite in their results, even though the documents are less than 1 ½ years apart and produced by the same consultant. Further there is little in the why of explanation as to why there has been a polar opposite approach.

We therefore consider that the evidence base, upon which the Proposed Modifications are formulated, to be unsound in that the evidence and therefore the plan has not positively prepared and does not meet the areas development needs, is not justified as it is not the most appropriate strategy and it will not be effective in meeting the Cities needs and is not consistent with national policy.

Our Proposed Amendments

There are a number of significant deficiencies in the City of York Housing Needs Update which means that the 790 dwellings per annum OAHN figure currently being pursued by the Council within the Proposed Modifications are unsound in that the housing requirement and evidence base are not justified, it will not be effective in meeting the Cities needs and the local plan has not been positively prepared and the approach adopted does not reflect Government Guidance.

To make the Local Plan sound it is recommended that an uplift for market signals and affordable housing need is provided, that an allowance is made for improving headship rates and that the 2014 Projections are used instead of the 2016 Projections.

We consider that Policy SS1 and subsequent affected policies are modified to reflect the following:

- The OAHN should be 1,150 per annum to allow for a sufficient uplift to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs.

This suggested modification reflects the professional opinion of the property sector and is echoed by the House Building Federation and other parties with a vested interest.

Conclusions

On behalf of the Developer we would like to attend the oral examination, to further progress the soundness of the Plan with regard to supply of housing for the City of York.

Please can we be kept informed of all forthcoming consultations upon the Local Plan and associated documents, by using the contact details provided below for future correspondence.

Yours sincerely,



Mark Lane
Director
DPP One Ltd
Mark.Lane@dppukltd.com
Tel: 0113 8197281
Mob: 07500 330091



From: Josh Brear [Redacted]
Sent: 19 July 2019 11:35
To: localplan@york.gov.uk
Cc: Mark Lane
Subject: H34 Land North of Church Lane, Skelton - City of York Local Plan Proposed Modifications 2019
Attachments: Final H34 - Land North of Church Lane, Skelton - PM Reps Letter 2019.pdf; Final H34 - Land North of Church Lane, Skelton - PM Response Form 2019.pdf
Follow Up Flag: Follow up
Flag Status: Completed

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

Please find attached a representation made on behalf of the Landowner for land North of Church Lane, Skelton (ref: H34), responding to the City of York Local Plan Proposed Modifications 2019.

Following receipt of this email, can a member of the Council’s Planning Policy team please respond to this email confirming that the representation has been received.

Kind Regards,

Josh

Josh Brear
Senior Planner

T: [Redacted]
M: [Redacted]
E: [Redacted]



[Cardiff](#) | [Leeds](#) | [London](#) | [Manchester](#) | [Newcastle upon Tyne](#)

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City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make.

Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Mark
Last Name		Lane
Organisation (where relevant)		DPP
Representing (if applicable)		Landowner
Address – line 1		1 Park Row
Address – line 2		Leeds
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		LS1 5HN
E-mail Address		Mark.Lane@dppukltd.com
Telephone Number		0113 819 7281

Representations must be received by Monday 22 July 2019, up until midnight.

Representations received after this time will not be considered duly made.

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM4

Document:

Publication Draft Local Plan (February 2018)

Page Number:

Page 26

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Please see supporting representation letter.

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared **Justified**

Effective **Consistent with national policy**

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

The Local Plan does not provide sufficient housing land to meet a properly formulated assessment of objective need and those sites identified will not deliver the units identified. On the basis of the above we consider that the Local Plan is unsound and will not be effective and therefore does not deliver sustainable development in accordance with national policy.

Please see supporting representation letter for full comments.

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.



You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

To make the local plan sound it is recommended that an uplift for market signals and affordable housing need is provided, that an allowance is made for improving headship rates and that the 2014 Projections are used instead of the 2016 Projections. We consider that Policy SS1 and subsequent affected policies are modified to reflect the following:

The OAHN should be 1,150 per annum to allow for a sufficient uplift to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs.

Please see supporting representation letter for full comments.

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To elaborate on our written representation.

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 2018 to inform the Local Plan process. We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't. City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

Signature



Date

19th July 2019

DPP Planning
One Park Row
Leeds
LS1 5HN
0113 819 7285
info@dppukltd.com
www.dppukltd.com



FREEPOST RTEG-TYYU-KLTZ
Local Plan
City of York Council
West Offices
Station Rise
York
YO1 6GA

19th July 2019

Your ref: H34
Our ref: JB/ML/2411le

Dear Sir / Madam,

COMMENTS ON THE CITY OF YORK LOCAL PLAN PROPOSED MODIFICATIONS CONSULTATION (10TH JUNE 2019 – 22ND JULY 2019) AND IN RESPECT OF LAND NORTH OF CHURCH LANE, SKELTON (HOUSING SITE REF: H34)

Introduction

Thank you for this opportunity to provide further commentary and representation to the City of York Local Plan Proposed Modifications (“the Proposed Modifications”) and its associated evidence base.

This submission is made on behalf of the Landowner and should be read in conjunction with previous detailed representations submitted to the City of York Council (“the Council”), throughout the plan making process which demonstrate that the proposed housing allocation on land North of Church Lane, Skelton (housing site ref: H34) (“the Site”) is suitable for housing development, that is available and that residential development is viable and achievable on the Site.

In relation to the Proposed Modifications we have set out the representation under the following headings:

- Background
- The Test of Soundness
- The Proposed Modifications

- Comments and Observations on the Proposed Modifications
- Our Proposed Amendments
- Conclusions

Background

Site H34 was assessed as part of the Council's rigorous selection methodology and as a result of passing this process; the Site was proposed as a housing allocation in the Preferred Options Draft (2013) and the Local Plans Working Group Publication Draft (2014) versions of the Local Plan. In this regard the Council must have previously satisfied themselves that the Site is available, suitable for development and the development is achievable at the point in time when the Site is intended to deliver development.

The Council current position is that, due to revisions to the evidence base and notably the proposed reduction in the housing requirement, certain previously proposed allocations have been modified or deleted. This does not mean that these sites or parts of these sites are unsuitable or inappropriate for development. Rather it simply means that the Council now consider that these sites or parts of these sites are less preferable than those sites proposed in the Submission Draft (2018) version of the Local Plan.

On the basis of the Council's revised evidence base and the alleged lower housing requirement, the Council have sought to reduce the number of housing allocations and one of those sites that the Council have deleted from the Submission Draft (2018) version of the Local Plan is H34.

The Landowner objects to the deletion of H34.

The Test of Soundness

Paragraph 182 of the NPPF (2012) indicates that a Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

The Proposed Modifications

Policy SS1 – Delivering Sustainable Growth for York

The City of York Council are proposing to reduce the housing requirement from 867 dwellings per annum to 790 dwellings per annum. The Proposed Modifications largely follow and are consequent upon the amendment to Policy SS1 which sets a need to deliver a minimum annual provision of 790 new dwellings over the plan period to 2032/33 and post plan period to 2037/38.

- PM3: Paragraph 2.5
- PM4: Policy SS1
- PM5: Explanation to SS1
- PM20a-d: Figure 5.1
- PM21a-d: Table 5.2
- PM22: Paragraph 5.9
- PM44: Table 15.2

Comments and Observations on the Proposed Modifications

The Proposed Modifications are based on the Housing Needs Update 2019; which was produced by GL Hearn to take into account the 2016-based sub-national population and household projections from ONS and CLG (“the 2016 Projections”).

The 2016 Projections reflect the following:

- Life expectancy will not increase at the same rate as previously.
- International in-migration is not expected to continue at the same rate as previously.
- A reduction in the household formation rates.

On behalf of the Landowner we object to the use of the 2016 Projections as a base for the Proposed Modifications. The reasons for this are as follows.

The Ministry of Housing, Communities and Local Government (‘CLG’) published a Technical Consultation on updates to the national planning policy and guidance document in October 2018. The document seeks views on changes to planning practice guidance on the standard method for assessing Local Housing Needs to ensure consistency with the Government’s objective of building more homes.

The document reaffirms the Government’s priority which is to deliver more and better designed homes and this has been a prominent theme in Government documents published over the last 18 months. The document indicates that since the publication of standard methodology, the base data has changed in that the household projections were produced by CLG but are now supplied by the Office of National Statistics (‘ONS’).

The ONS published the latest household projections on 20th September 2018. These reduce the projected rate of household formation compared to the previous projections (“the 2014 Projections”), and the Government indicates within the document that this results in the national minimum annual housing need calculated using the standard method falling significantly. The numbers have fallen from 269,000 homes (rounded up to 300,000 dwelling per annum) prior to publication, to approximately 213,000 based on the updated data. This now sets the national minimum annual housing need figure to below the 217,350 homes delivered last year.

The paper confirms that the Government has considered whether it needs to change its aspirations for housing supply in light of the new household projections and the paper indicates at paragraph 11 that it has decided that it is not right to change its aspirations. Paragraph 11 gives the following reasons:

- The annual change in household projections comprises two aspects: a reduction of 29,000 arising from the lower population projections, and a reduction of 23,000 arising from changes in the method for converting population change into estimates of household formation – (reducing the historic period of household formation on which the projections are based from five census points to two, which focuses it more acutely on a period of low household formation where the English housing market was not supplying enough additional homes). In this regard the Government considers that methodological changes are not a reason why the Government should change its aspirations.
- Household projections are constrained by housing supply. If new, additional homes are not supplied, then households cannot form as there would be nowhere for them to live.
- The historic under-delivery of housing means there is a case for public policy supporting delivery in excess of household projections, even if those projections fall.
- Other things being equal a more responsive supply of homes through local authorities planning for more homes where we need them will help to address the effects of increasing demand, such as declining affordability, relative to a housing supply that is less responsive.
- The above factors have led to declining affordability, as evidenced by the decrease in the number of people living in an area with an affordability ratio of 4 or less: from 23 million (47% of the population) in 2000, to 395,000 (less than 1% of the population) in 2017. Similarly, there has been an increase in those living in areas with an affordability ratio of more than 8: from 2.8 million (around 6% of the population) to 28 million (nearly 50% of the population) over the same period. This indicates that the Government should not be less ambitious for housing supply.

The Government also concludes that population changes are only one aspect of the driver for housing supply. Rising incomes, changing social preferences and factors such as real interest rates and credit availability contribute to demand for housing.

The paper also refers to the ONS and indicates that the ONS believe that the updated 2016-based household projections do not take into account how many people may want to form new households, but for whatever reason are unable to, such as first-time buyers or people wanting to live on their own instead of a house share. Therefore, this snapshot of past trends is not a measure of how many houses would need to be built to meet housing demand. The ONS confirm that although the projections are lower than previously published, this does not directly mean that fewer houses are needed in the future.

The Government has therefore concluded that there is no need to change its aspirations for increasing housing supply and remain committed to delivering 300,000 dwellings pre-annum.

The Government considers that the best way of responding to the new ONS household projections is to make three changes:

- For the short-term, specify that the 2014-based data will provide the demographic baseline for assessment of local housing need;

- To make clear in national planning practice guidance that lower numbers through the 2016-based projections do not qualify as an exceptional circumstance that justifies departure from the standard methodology; and
- In the longer term, to review the formula with a view to establishing a new method.

This is now reflected in the Planning Practice Guidance (PPG) which indicates that *“any method which relies on using the 2016-based household projections will not be considered to be following the standard method as set out in paragraph 60 of the National Planning Policy Framework. As explained above, it is not considered that these projections provide an appropriate basis for use in the standard method.”* The impact of the 2016 Projections, if applied to a calculation based on an OAHN, is no different to their application under the standard methodology. It is therefore clear from the Governments Technical Consultation and the PPG that the 2016 Projections should not be used.

In conclusion on the use of the 2016 Projections these show a general decrease in household growth which is at odds with the Government stated aspiration which to increase housing delivery to 300,000 dwellings per annum by the mid-2020s and it is recognised that this will not be achieved if the local planning authorities adopt the 2016 Projections to either calculate their Objective Assessment of Housing Need (“OAHN”) or in utilising the standard method of calculating the Local Housing Need Assessment.

We therefore consider that the evidence base, upon which the Proposed Modifications are formulated, to be unsound in that that it is not positively prepared and does not meet the areas development needs, it is not justified as it is not the most appropriate strategy and it will not be effective in meeting the Cities needs and is not consistent with national policy.

Notwithstanding our concerns about the use of the 2016 Projections we also have concerns about the City of York Housing Needs Update dated January 2019 specifically we note that the approach taken by GL Hearn within the City of York Housing Needs Update is not consistent in its approach to the preparation of the previous SHMA and addendum update (May 2017) also produced by GL Hearn.

In particular we note that:

- The SHMA 2017 report recommends that based on their assessment of market signals evidence that York should include a 10% market signals adjustment to the 867 figure. This would increase the housing figure to 953 per annum. The market adjustment is based on an assessment of both market signals and affordable housing need. GL Hearn has considered a single adjustment to address both of these issues as they are intrinsically linked. This approach has been abandoned in the City of York Housing Needs Update dated January 2019.
- Despite previously identifying a net affordable housing need of 573 dwellings per annum the City of York Housing Needs Update dated January 2019 does not reassess this need. It does note at paragraph 4.28 that *“it seems clear from this that the expectation is that it may be necessary, based on the affordable needs evidence to consider an adjustment to enhance the delivery of affordable housing, but that this does not need to be done in a ‘mechanical way’ whereby the affordable need on its own drives the OAN.”* No uplift to address the affordable housing crisis has however been made.
- Further the City of York Housing Needs Update dated January 2019 notes that market signals show that housing affordability is a worsening issue in York and that house prices have increased in the past year and the affordability ratio between house prices and earnings has also worsened. The City of York Housing Needs

Update dated January 2019 indicates that these housing market signals suggest that, in accordance with PPG, an uplift to the demographic projections is appropriate. However, no uplift has again been made.

- We welcome the use of the economic led housing need scenario in the City of York Housing Needs Update dated January 2019. This reflects a positive attitude to growth and accords with one of the basic principles of the NPPF. The scenario considered is 11,050 plus additional jobs over the remaining 17 years of the plan period to 2031 (2014 to 2031). This equates to the creation of 650 new jobs per annum and these new jobs have been converted to a housing requirement. However, the creation of new jobs within the City does not reduce the market signals or the affordable housing crisis. It is plain that the suggested uplift of 15%, as recommended by GL Hearn in the City of York Housing Needs Update dated January 2019, should have been added to the economic led housing need of 790 dwellings per annum.
- As made clear in the City of York Housing Needs Update dated January 2019 the economic led housing need scenario considers the plan period to 2031 (2014 to 2031) whereas the Local Plan provides for development in the period to 2032/2033 and in the post plan period to 2037/2028 to ensure that the Green Belt remains permanent. The figure of 790 dwellings per annum, which is reflected in the Proposed Modifications, therefore plainly does not address the correct plan period and therefore it does not meet the housing need.
- Finally, the figure of 790 dwellings per annum is the need identified in the City of York Housing Needs Update dated January 2019 City of York Council and this is reflected in the Proposed Modification. The figure of 790 dwellings per annum does not take into account persistent under delivered.

The findings within the associated evidence bases are contradictory and polar opposite in their results, even though the documents are less than 1 ½ years apart and produced by the same consultant. Further there is little in the way of explanation as to why there has been a polar opposite approach.

We therefore consider that the evidence base, upon which the Proposed Modifications are formulated, to be unsound in that the evidence and therefore the plan has not positively prepared and does not meet the areas development needs, is not justified as it is not the most appropriate strategy and it will not be effective in meeting the Cities needs and is not consistent with national policy.

Our Proposed Amendments

There are a number of significant deficiencies in the City of York Housing Needs Update which means that the 790 dwellings per annum OAHN figure currently being pursued by the Council within the Proposed Modifications are unsound in that the housing requirement and evidence base are not justified, it will not be effective in meeting the Cities needs and the local plan has not been positively prepared and the approach adopted does not reflect Government Guidance.

To make the local plan sound it is recommended that an uplift for market signals and affordable housing need is provided, that an allowance is made for improving headship rates and that the 2014 Projections are used instead of the 2016 Projections.

We consider that Policy SS1 and subsequent affected policies are modified to reflect the following:

- The OAHN should be 1,150 per annum to allow for a sufficient uplift to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs.

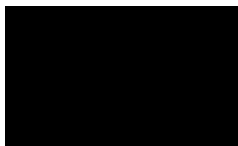
This suggested modification reflects the professional opinion of the property sector and is echoed by the House Building Federation and other parties with a vested interest.

Conclusions

On behalf of the Landowner we would like to attend the oral examination, to further progress the soundness of the Plan with regard to supply of housing for the City of York.

Please can we be kept informed of all forthcoming consultations upon the Local Plan and associated documents, by using the contact details provided below for future correspondence.

Yours sincerely,



Mark Lane

Director

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City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

PM:SID 603

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Miss
First Name		Rebecca
Last Name		Housam
Organisation (where relevant)	The Retreat Living Ltd	Savills (UK) Ltd
Representing (if applicable)		
Address – line 1	C/o Agent	City Point
Address – line 2		29 King Street
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		LS1 2HL
E-mail Address		████████████████████
Telephone Number		0113 220 1277

Representations must be received by Monday 22 July 2019, up until midnight.

Representations received after this time will not be considered duly made.

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM3, PM5, PM35 and Policy H1 (p.97-98)

Document:

Proposed Mods, EX CYC 9, EX CYC 16 (pp.1), EX CYC 18, EX CYC 18a

Page Number:

pp.16 – 91 of Local Plan, EX CYC 9 (pp.1-26), EX CYC 18 (pp.1-89), EX CYC 18a (pp.1-23).

What does ‘legally compliant’ mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Please see attached representation.

What does ‘Sound’ mean?

Soundness may be considered in this context within its ordinary meaning of ‘fit for purpose’ and ‘showing good judgement’. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework’s four ‘tests of soundness’ listed below.

What makes a Local Plan “sound”?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable

alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

Please see attached representation.

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

Please see attached representation.

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please see attached representation.

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 2018 to inform the Local Plan process. We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't. City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations. ² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

	
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Date

22.07.19

The Retreat, York

Representations to The Proposed Main Modifications Local
Plan Consultation



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1. Introduction

- 1.1. Savills (UK) Ltd welcomes the opportunity to make representations with reference to the City of York Local Plan Proposed Modifications (June 2019) on behalf of our client, The Retreat Living Ltd. These representations should be read in conjunction with those previously submitted by Carter Jonas at the Publication Draft Stage and with JLL's representations at the Preferred Sites Stage.
- 1.2. These representations have been prepared in support of 'The Retreat', York identified on the attached site location plan (Appendix 1).
- 1.3. The thrust of these representations is to share the significant concerns we have over York's approach to over relying on the 2016 OAN figures for determining their housing numbers. National policy and guidance states that *'the 2014-based household projections should be used within the standard method to provide stability for planning authorities and communities, ensure that historic-under delivery and declining affordability are reflected and to be consistent with the Government's objective of significantly boosting the supply of homes'* (Paragraph: 005 Reference ID: 2a-005-20190220).
- 1.4. In addition, given the time elapsed since a Local Plan for York has been adopted, it is clear new sites will need to come forward for development which suggests Green Belt release will be essential in poor performing Green Belt locations to fulfil such requirements. The land at 'The Retreat' represents an opportunity to deliver essential growth, within a poor performing Green Belt location that does not fulfil the purposes of the Green Belt, as detailed in section 3.
- 1.5. These representations will mainly focus on the modifications document (EX CYC 18a), and subsequent updates to the following;
 - EX CYC 9 - City of York Housing Needs Update – GL Hearn January 2019
 - EX CYC 16 – Figure 6: Detailed Housing Trajectory (790 dpa OAN)
 - EX CYC 18 – Green Belt TP1 Addendum FINAL Amended
- 1.6. A review of York's housing trajectory will be undertaken in order to demonstrate why it's considered that Green Belt release is required to fulfil this requirement in this respect. Green Belt release is considered to be essential if the emerging Plan is to deliver on its true housing requirement. Notwithstanding this, it is not the intention of this representation to assert what the correct housing need figure should be, rather to set out the options for comparison given current uncertainties over how housing need should be calculated now and in the future. Comments are also made in relation to affordable housing and safeguarded land.
- 1.7. In summary our main representations are:
 - The Vision and Outcomes are not justified or effective as they are not backed by positive policies to meet identified housing need;
 - The housing requirement and the predicted housing supply is not justified, effective or consistent with national planning policy or even the council's own evidence base. In particular, the minimum annual provision of 790 new dwellings per annum is not based upon any robust objective assessment of need. As a result, the emerging Plan will not deliver sufficient new housing;

- The Plan is considered to be unsound and in conflict with the NPPF as no safeguarded land is proposed to help meet “longer term needs stretching well beyond the plan period¹”;
- City of York’s emerging Plan requires additional allocations and Green Belt release given the shortfall identified in our independent assessment of York’s housing trajectory at appendices 3 & 4;
- The proposed extent of Green Belt is considered to be unsound as the proposed inner boundary is tightly drawn to unreasonably restrict development opportunities which are considered to necessary for the growth of York;
- The Southern boundary of The Retreat Estate would form a logical, permanent and strong Green Belt boundary and a well-defined edge to the built-up part of the city in this location;
- The Retreat Estate, does not fulfil any of the five Green Belt purposes as set out at paragraph 134 of the National Planning Policy Framework (NPPF 2019);
- Development of The Retreat Estate could be undertaken in a sensitive manner to provide much needed housing, whilst preserving and protecting the identified heritage assets and the special character of the City of York in this location; and
- In light of the above matters, The Retreat Estate should be excluded from the Green Belt as it does not fulfil the Green Belt purposes.

National Policy Background

- 1.8. This representation has been prepared in accordance with paragraph 35 of the NPPF which states Local Plans must be:
- a. **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs¹⁹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b. **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c. **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d. **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.
- 1.9. The following sections of this report are arranged as follows:
- Section 2: Provides background to the site;
 - Section 3: Sets out our comments on the Initial Draft Local Plan;
 - Section 4: Outlines the Deliverability and Developability of the site; and,
 - Section 5: Concludes and summarises the report.

¹ NPPF Paragraph 139

The Retreat, York

Representations to The Proposed Main Modifications Local Plan Consultation



2. Site Context

Site Description

- 2.1. These representations are in respect of the land and buildings at The Retreat, Heslington Rd, York, YO10 5BN (the Site). The Site is currently in use as a hospital (C2) specialising in mental health, however services have declined over recent years as the buildings are no longer considered to be fit for purpose. Some services remain on site however the Estate is currently exploring opportunities to re-locate some services on site and potentially relocate other services off site.
- 2.2. The Site comprises approximately 40.03 acres (16.2 ha) of land immediately to the South East of the main urban area of York, (Grid Reference E: 461574, N: 450925) as demonstrated on the enclosed Location Plan (Appendix 1), and is set out in figure 1 below for clarity.
- 2.3. The Site is located to the south of Hull Road (A1079) and Heslington Road and immediately to the west of properties adjacent to University Road and East of Belle Vue St. The Site has access points off the junction between Heslington Rd and Thief Lane. The Site could also be accessed at its Southern most boundary at Wentworth Way and to the East at University Road.
- 2.4. The Site itself comprises arable grassland, a Grade II* Registered Park and Garden, a combination of buildings some with Listed status and an Ancient Scheduled Monument (Lamel Hill–Anglo Saxon Tumulus) all of which is currently located within City of York's (CYC) Draft Green Belt².
- 2.5. The character of the immediate area is predominately residential, close to York's established centre, with services including shops, cultural facilities, and a hospital. The centre is also served by a railway station. The Northern section of the site is within 250m of an AQMA on Lawrence Street.



Figure 1 - Site Location Plan

² York Local Plan – Policy SS2 and GB1

Planning Background

- 2.6. Since May 1997, The Retreat has had 67 planning applications, many of which have been small internal and external alterations and extensions to buildings associated with The Retreat. Some of these alternations have also required Listed Building Consent.
- 2.7. In 2002 there was an application for the formation of 9 extra car parking spaces, requiring a travel plan (application 02/02291/FUL). There have also been applications referring to tree works, mainly felling. The largest application was for the erection of a patient day care centre and associated walled garden which was approved in 2016 (application reference: 15/00420/LBC).
- 2.8. The Retreat is currently classified as a Residential Institution falling within Class C2 of the Town and Country Planning (Use Classes) Order 1987. Having been considered at earlier stages of the plan, the land is covered by Site References 861 and 862 within the Strategic Housing Land Availability Assessment (SHLAA) (2017). As was before, our client is still keen to work with the City of York Council to help ensure a sound Local Plan can be adopted as soon as possible. We would strongly welcome the opportunity to engage with the Council further upon matters of Green Belt Review and the development potential of the Site if the opportunity to do so arises.
- 2.9. As of 4th April 2019, Carter Jonas, former advisors of The Retreat, have received a written response to their pre-application enquiry (18/02817/PREAPP) from December 2018. The report identifies the entire Site to be within the York Green Belt and concludes that there are concerns about the impact of the wider proposals would have on the open character and setting of the sites and the resulting harm with regards to the openness and purposes of the York Green Belt, the setting of Listed Buildings, the Registered Park and Gardens and the Conservation Area and two important trees and their setting.
- 2.10. Time has elapsed since the original pre-application submission in December 2018 and Savills have since been appointed as Planning and Development Advisors on behalf of The Retreat for the wider Estate. As such, these representations will broadly outline the changes in the approach to the envisaged development of the site moving forward. It is also worth noting that additional pre-application discussions are taking place with CYC regarding this revised approach. Given the further advanced nature of the 'Local Plan', the need for further Green Belt release in order for the Council to realise and meet their identified housing need is evident. Any potential re-development of the Site moving forward will seek to ensure a site of local importance is preserved in the most viable and sustainable way for all parties moving forward in this respect.

SHLAA 2017 Commentary

- 2.11. Officers considered that the Site should not be included as an allocation in the emerging Local Plan, due to the significant constraints of the site (impact on heritage assets and landscape), concluding that any future development of the site should instead be assessed through the Development Management/Planning Application process and not as an allocation. This approach is agreed to an extent therefore it is important to note that these representations do not seek to allocate the Site for development as such, more so to demonstrate why the Site should not be included within the Green Belt moving forward.



3. Proposed Main Modifications Local Plan Commentary

3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM3, PM5, PM35 and Policy H1 (p.97-98)

Document:

Proposed Mods, EX CYC 9, EX CYC 16 (pp.1), EX CYC 18, EX CYC 18a

Page Number:

pp.16 – 91 of Local Plan, EX CYC 9 (pp.1-26), EX CYC 18 (pp.1-89), EX CYC 18a (pp.1-23).

Section 2 (Vision and Development Principles)

Vision and Development Principles

- 3.1. Throughout this representation it is evident that we have significant concerns regarding the reduction of the annual housing requirement. As such, we believe that the vision fails to adequately address the need for housing growth to help both deliver and underpin the aims and objectives of sustainable development. We are of the view that through reinforcing the reduction of the District’s Housing Need to 790 dpa, growth which has not yet been identified, will be stifled. This will therefore limit the ability of York in meeting their housing targets and as such, this approach should be strongly re-considered in line with both the NPPF & PPG.
- 3.2. The Policies outlined below have not been addressed as part of this representation as they remain unchanged however, we would like it to be noted that, because of this, the comments previously submitted by Carter Jonas on behalf of The Retreat in respect of these Policies still stand and Savills (UK) Ltd supports them in full:
 - Policy DP1: York Sub Area;
 - Policy DP2: Sustainable Development;
 - Policy DP3: Sustainable; and
 - Policy DP4: Approach to Development Management.

Section 3 (Spatial Strategy)

Policy SS1: Delivering Sustainable Growth for York

- 3.3. Policy SS1 details the Spatial Strategy for York by setting out the drivers for growth and the factors that shape it, alongside detailing the key areas for change within the City. We are concerned with the proposed amendments to this Policy which are detailed in the following Housing Section of this report.
- 3.4. Technical work has been carried out by GL Hearn in the Strategic Housing Market Assessment Update (2017). This work has updated the demographic baseline for York based on the July 2016 household projections to 790 per annum.

- 3.5. Following consideration of the outcomes of this work, the Council aims to meet an objectively assessed housing need (OAN) of 790 new dwellings per annum for the plan period to 2032/33, including any shortfall in housing provision against this need from the period 2012 to 2017, and for the post plan period to 2037/38.
- 3.6. Irrespective of the Council's view that they can demonstrate an adequate short and longer-term supply as required by national guidance, we strongly disagree. We also disagree with the Council's justification in this respect which assumes that due to build out rates, the delivery of sites will extend post plan period.
- 3.7. We further disagree with the suggested approach outlined, which suggests that the housing target is being reduced in response to a historic under delivery of housing. There should be no relationship between the historic under delivery of housing and the overall housing target which should be set on the basis of an identified need.
- 3.8. The City of York Council should strive to improve the deliverability of sites in the area over the Plan Period. Any deliverability issues will be addressed through a separate mechanism, the forthcoming Housing Delivery Test. Any shortfalls are likely to be addressed through the HDT by a buffer which is to be applied to the housing targets moving forward. The level of buffer required is dependent on the level of under-delivery at the annual point of assessment.
- 3.9. Targeting a reduced OAN has potential to stifle development moving forward and will prevent the development of strong, sustainable communities through addressing the housing and community needs of York's current and future population. This matter will be explored in further detail later in this Section whereby Policy H1 is explored in more detail, alongside the detailed housing trajectory. The findings of which, suggest that the Council's assumptions are unfounded in this respect and therefore further allocations are required.

Recommendation 1: *City of York Council should at the very least reword their vision in line with the Regulation 19 Publication document in the spirit of effective, sound and justified plan making.*

Policy SS2: The Role of York's Green Belt

- 3.10. The Modifications document does not specifically alter the wording of this Policy however, a further update to 'Topic Paper 1' Approach to defining York's Green Belt Addendum (EX CYC 18) was published in March 2019, which is considered to overlap with the above Policy therefore the following comments are considered to be relevant in this respect.
- 3.11. The NPPF makes clear the importance of Green Belts. The NPPF outlines that Green Belts should serve five purposes³ as follows:
- i. to check the unrestricted sprawl of large built-up areas;**
 - ii. to prevent neighbouring towns merging into one another;**
 - iii. to assist in safeguarding the countryside from encroachment;**
 - iv. to preserve the setting and special character of historic towns; and**
 - v. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.**

³ NPPF Paragraph 133

- 3.12. The General Extent of Green Belt for York was established by the Yorkshire and Humber Plan and was retained under 'The Regional Strategy for Yorkshire and Humber (Partial Revocation) Order 2013'. We welcome the opportunity for the establishment of detailed Green Belt boundaries for the first time and consider that this issue is of great importance to a Sound Plan for the city. Under 'Saved' Policy YH9 of the Yorkshire and Humber Plan, the Council must "establish long term development limits that safeguard the special character and setting of the historic city".
- 3.13. Notwithstanding the above, in establishing the inner and outer Green Belt boundaries, the Council must also bear in mind the need to:
- allocate sufficient land for development; and
 - identify areas of 'safeguarded land' for potential development beyond 2033.
- 3.14. Land for housing within the built-part of York is at a premium due to a significant pent-up housing demand across the City. The Publication Draft Plan already takes into account the key strategic regeneration sites and their capacity to deliver new housing. Despite this, the Green Belt boundaries proposed within the emerging Plan seem to have been prepared with maximum development restraint in mind and therefore limited flexibility for safeguarded land moving forward. As it stands, Policy SS2 cannot be considered Sound as it is not considered to be effective nor justified. As outlined in this representation, we strongly recommend that the emerging Plan includes a significant housing uplift to the proposed housing requirement. It is therefore considered that additional Green Belt release will be necessary in order to meet this demand and the essential needs of the people who live or desire to live in York, both now and in the future.

Safeguarded Land

- 3.15. In order to be consistent with Paragraph 139 of the NPPF, it is considered necessary for Local Authorities to formally identify safeguarded land to meet longer-term development needs stretching well beyond the plan period. Whilst we recognise that the Council seeks to provide for the provision of land up to '2037/2038', we are of the view that this still falls well short of the NPPF requirement to *meet the longer term development needs stretching well beyond the plan period*⁴.
- 3.16. It is concerning that the Council considers that they have sufficient allocations to meet their housing provision against a reduced need of 790 dpa during the period 2017 to 2033 and for the post plan period to 2037/38, given that this is dependent on the approach envisaged in CYC's trajectory which is considered to be vague and heavily reliant upon uncertain market conditions. We would strongly disagree with the Council's approach and the proposed absence of any safeguarded land in this respect. It is strongly recommended that the Council specifically designate Safeguarded Land in the emerging Local Plan in order to ensure the required permanence⁵ (para 136 NPPF 2019) of the Green Belt in the long term.

⁴ NPPF, Paragraph 139:c

⁵ Para 5.64 of Topic Paper 1 Addendum – Annex 1 - Approach to defining York's Green Belt – March 2019

- 3.17. In summary and in line with national guidance, the proposed inner and outer Green Belt boundaries should be amended as appropriate to release additional land from the Green Belt to enable additional housing land to be allocated to meet the true LHN figure, with additional Safeguarded Land identified, to ensure the development needs are met beyond the Plan Period of 2038 for Green Belt boundaries specifically.
- 3.18. The following Section will seek to determine to what extent The Retreat Site meets any of the Green Belt purposes and therefore establish if the Site's inclusion within the Green Belt is justified and based upon an up to date evidence base. In line with previous representations made by Carter Jonas on behalf of The Retreat in respect of this policy, in order to render it sound it should be modified as follows:

Recommendation 2: Add reference to Policy SS2 which should now read as follows- *'The primary purpose of the Green Belt is to safeguard the setting and the special character of York and delivering the Local Plan Spatial Strategy. New buildings in the Green Belt is inappropriate unless it is for one of the exceptions set out in policy GB1. The general extent of the Green Belt is shown on the Key Diagram. Detailed boundaries shown on the proposals map follow readily recognisable physical features that are likely to endure such as streams, hedgerows and highways. To ensure that there is a degree of permanence beyond the plan period, additional land should be released from the General Extent of Green Belt to be safeguarded for development beyond the plan period as appropriate and further land should be allocated for development from this, to meet the needs identified in the plan and for a further minimum period of five years to 2038'*.

Topic Paper 1 Addendum – Annex 1 - Approach to defining York's Green Belt – March 2019

- 3.19. The above document sets out to provide further clarity on how and where detailed inner and outer Green Belt boundaries have been defined through the Local Plan. The purpose of this document is to further reinforce the strategic approach to the Green Belt which the Council considers was set out at a high level through Topic Paper 1 (TP1 2018). This addendum is intended to further set out how strategic sites in the general extent of the Green Belt have been selected and boundaries established.
- 3.20. The Retreat sits within Section 7, Boundaries 15 – 17 of the Inner Boundaries and Descriptions document which was updated in March 2019⁶.
- 3.21. The Council state that in drawing up detailed inner and outer boundaries, a strategic approach was taken which relates to the five purposes of the Green Belt as set out in the NPPF and listed above.
- 3.22. Section 7 of Topic Paper 1 considers how York's development needs will be met, taking account the use of Brownfield and underutilised land, concluding that it would not be possible to meet the total housing, employment, gypsy and traveller and travelling show people housing, and educational needs without some Green Belt release and the allocation of sites within it⁷.

⁶ pp.409-423

⁷ TP1 Paragraph 7.117

- 3.23. The Paper goes on to state that no further Green Belt release will be required in addition to what has already been removed when allocating sites from the General Extent of the Green Belt. We wholeheartedly disagree with this assumption.
- 3.24. We would, however, agree with the Council in the following statement: *if insufficient land is released from the Green Belt and some of the sites fail to come forward as expected, this could jeopardise the fulfilment of the Council's objectives*⁸.
- 3.25. In specially addressing the need to remove land from the Green Belt, the Council consider that in making such a decision, it would be prudent to ensure that the exceptional circumstances tests are met and in line with national policy updates on this matter in line with paragraph 138 of the NPPF 2019. Savills agree with this approach in principle however, we offer some additional points of reference on the matter as follows.
- 3.26. In drawing up and defining Green Belt boundaries, Local Authorities should:
- take account of the need to promote sustainable patterns of development and consider the consequences of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary⁹.
 - ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development¹⁰.
 - Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.¹¹
- 3.27. It is important to note that whilst acknowledging that the Plan has been written to comply with NPPF (2012), there are aspects mentioned in the addendum document that also considers the implications of the 2019 NPPF which is considered to be appropriate in principle.
- 3.28. Section 4 of Topic Paper 1 (EX CYC 18) sets out how the Local Plan has identified land which needs to remain permanently open in terms of the five Green Belt purposes.
- 3.29. The Council are of the view that land which serves more than one Green Belt purpose can be held to carry additional weight and, when determining defensible boundaries, offer additional strength. We would agree with this approach to an extent however, in some areas, such as York, housing needs cannot be met without some Green Belt release in principle. As such, sites which are considered to serve only one purpose should be reviewed for Green Belt release in advance of other sites which fulfil more than one Green Belt purpose in this context.

⁸ TP1 Paragraph 7.100

⁹ Paragraph 138 NPPF 2019;

¹⁰ Paragraph 139 NPPF 2019.

¹¹ Paragraph 138 NPPF 2019

- 3.30. The following sections will discuss in detail the degree at which Savills agrees with the assumptions made regarding the Green Belt purposes and their relation to York's Green Belt. This said, Savills are minded to conclude that 'The Retreat' does not fulfil any of the five Green Belt purposes, which is discussed further in the following section.
- 3.31. It's recognised that previous representations made on behalf of The Retreat by Carter Jonas did not review the Green Belt purposes in great detail in context of the Site, as the Green Belt boundaries had not been established at that point in time.

Purpose 1: To check the unrestricted sprawl of large built up areas

- 3.32. As outlined within the NPPF, the main purpose of the Green Belt as a whole is to prevent urban sprawl. As such, channelling development towards urban areas, towns or villages inset within the Green Belt, or beyond the outer boundary, indicates that planned development does not constitute sprawl¹².
- 3.33. It's our professional view that 'The Retreat' relates well to the main built up area of York, therefore it should not be included within the general extent of the Green Belt. The Retreat Estate does not have the characteristics of openness normally associated with the Green Belt, owing to its significant built form and character, set within walled grounds; with accessibility to sustainable modes of transport and a range of services i.e. The University of York and is within 300m of St. Lawrence's CE Voluntary Aided Primary School on Heslington Rd and 800m of Parkview Doctors Surgery, a Petrol Station and various shops and takeaways.
- 3.34. The contained nature of the Site by way of its strong boundaries means that the Site turns its back on Walmgate Stray and indeed the rest of the proposed Green Belt in this location. Therefore, the development of the Site would not be considered to harm the openness of the Green Belt in this context, as it sits distinctly out of the open countryside and is of a distinctly different character to the surrounding Green Belt area. Notwithstanding this, it's agreed that 'The Retreat' is important to the historic nature and character of York, and should therefore be protected in some form or another, but this does not necessarily justify the proposed Green Belt designation in this context. Any potential re-development of the Site moving forward can be managed through the usual Development Management process, within which there is a Statutory Duty for the Council to consider the numerous Historic Designations relevant to the Site.

¹² TP1 Paragraph 4.23

- 3.35. York City Council state that they have identified all the land in York which does not currently have access to two or more services¹³ and seeks to designate such land to remain permanently open as part of the proposed Green Belt. As a result of this, the Council indicate that development is therefore channelled towards sustainable locations and sprawl is restricted¹⁴. We would agree with this theory in principle however, The Retreat should be considered positively in this context given the Site's proximity to several easily accessible services, as was indicated in TP1 Addendum - Annex 3: Inner Boundary Descriptions and Justifications – March 2019¹⁵ that 'The Retreat' is in a highly sustainable location, due to its proximity to key services.
- 3.36. For clarity the 'reverse access to services map' which was a part of Topic Paper 1 (2018) illustrates all areas which have access to less than two separate services (p.21). This outlined the assumption that incremental development in the locations identified, and in areas without key services, would likely exacerbate urban sprawl.
- 3.37. This map clearly demonstrates that 'The Retreat' has access to two or more services and it is included as white land on this map.
- 3.38. It therefore seems a logical assumption, in order to be consistent with the Council's evidence base in this respect, that The Retreat is excluded from the Green Belt in this location as it is not considered to fulfil the Green Belt purpose of checking unrestricted sprawl of large built-up areas.
- 3.39. In addition to the above, the Site sits within the urban environment of the City of York therefore the strong physical boundaries of the Site itself perform a role in their own right of preventing unrestricted sprawl beyond the Site boundaries in this respect. The Green Belt designation is therefore not required to fulfil this purpose in this regard.

Purpose 2: To prevent neighbouring towns merging into one another

- 3.40. The appraisal identified six key areas of the City which are essential to prevent coalescence. These areas of land have been identified under Purpose 4. Notably, Strays and Common Land, have prevented coalescence and helped retain the distinctive characteristics of individual settlements in principle. The Retreat have no objections to Walmgate Stray continuing to fulfil its role in this respect.

¹³ Para 4.25, p.14-15

¹⁴ Para 4.25, p.14-15

¹⁵ P.407-423

'The Retreats' Physical Boundaries

- 3.41. *Walmgate Stray wraps around the west, east and southern boundaries of 'The Retreat'. Particularly on the western and southern boundaries of the site, solid physical boundaries including red brick walls and railings provide a strong definition of the boundary of the site. Along the eastern boundary, natural hedgerows and mature trees define the boundary*¹⁶.
- 3.42. Savills would agree with the Council's assessment that Walmgate Stray to the East of the proposed Green Belt boundary is adjacent to 'The Retreats' eastern boundary and that it has historical importance as grazing land, currently in use as public open space. Notwithstanding this, the Green Belt purpose of preventing neighbouring towns merging into one another is not applicable to The Retreat Estate because of the aforementioned location of the Site, some of which has been previously developed. Walmgate Stray frames the Site beyond its western, eastern and southern boundaries. Furthermore, Walmgate Stray extends south of the site and opens up into countryside. Walmgate Stray is therefore considered to perform the role of this Green Belt purpose in this location, as such, The Retreat Estate should not be included within the Green Belt as it is not considered to fulfil this purpose.

Purpose 3: To assist in the safeguarding of the countryside from encroachment

- 3.43. This purpose serves to distinguish the countryside from built-up urban land and protect the countryside, strengthened by using recognisable and permanent boundaries. Here we must note that 'the Site' is surrounded by existing development immediately west, north and east of the site, with all such areas excluded from the proposed Green Belt. The Site itself is dominated by the Retreat (Hospital Building), which dominates the northern part of the site, with other associated medical buildings also on site to the east, south east and south of the main building. Whilst the main building and others are Listed, the Site operates and functions as an urban location and does not function as countryside or a site that safeguards the adjacent countryside from encroachment.
- 3.44. As outlined above, the Site benefits from strong boundaries on all sides. Here we draw your attention to Topic Paper 1 where it states that *"the effect is strengthened by using recognisable and permanent boundaries"*¹⁷. The boundaries mentioned under purpose 2, clearly define the Site, which prevent any development of the Site from encroaching into the countryside. Furthermore, the Site is physically and visibly contained such that it turns its back on the surrounding open countryside to the south. The Site is not publically accessible and does not function as a public open space as the site is entirely within private ownership. The adjacent Walmgate Stray performs this role of safeguarding the countryside from encroachment, which starts at the Walmgate Stray northern boundary. The Site itself does not fulfil this role as countryside land, as it is within private ownership and not publically accessible. There is no through route from the Site to Walmgate Stray and there are no intentions for a through route from the Site to Walmgate Stray for any re-development proposals of the Site moving forward. There is therefore no threat to the encroachment of the countryside from the Site in this location. The countryside begins at Walmgate Stray and beyond.

¹⁶ York Local Plan, Preferred Sites Consultation, July 2016: JLL Representations for the Retreat.

¹⁷ TP1, paragraph 4.32

- 3.45. The aforementioned strong site boundaries are further enhanced by the established mature trees within the Site boundary which further screen the Site, thus minimising any visual impact into the site from the Walmgate Stray and vice versa which therefore reduces any impact on the landscape character into the Stray.
- 3.46. In light of the above, the Site is not considered to fulfil the Green Belt purpose of assisting in safeguarding the countryside from encroachment albeit it is agreed that the adjacent Walmgate Stray fulfils this role. Notwithstanding this, the Walmgate Stray fulfilling this role does not mean the Site also fulfils this role given the strong site boundaries and urban use of the Site as outlined above. The Site should be excluded from the Green Belt on these grounds.

Recommendation 3: *York should redraw the Green Belt Boundary so that it follows the strong established boundaries of 'The Retreat' which are recognisable, substantial, physical and natural features which should sit outside of the Green Belt. In line with paragraph 129 NPPF 2019, these features are readily recognisable and permanent. The Retreat Estate should be excluded from the Green Belt.*

Purpose 4: To preserve the setting and special character of historic towns

- 3.47. Savills would agree that Purpose 4 of the Green Belt is the primary purpose of the York's Green Belt. From this, and given the historical importance of 'The Retreat', it's vital that this purpose is also considered in line with the NPPF, PPG and Historic England's advice for completeness.
- 3.48. We would further agree with the outcomes of The Heritage Topic Paper 2014 which now forms part of the emerging Local Plan evidence base. This Topic Paper identifies six principle characteristic which set York apart from other similar cities in England; strong urban form, compactness, landmark monuments, architectural character, archaeological complexity and landscape and setting, all of which informed the additional Green Belt work by CYC and seeks to ensure that any new development makes a positive contribution to heritage assets.
- 3.49. It is recognised that openness is an important feature to the special character and setting of York, ensuring spatial landscape features, views, perceptions and connectivity is maintained and protected.
- 3.50. The Site forms part of The Retreat/Heslington Road Conservation Area and includes a Grade II* Listed Building, several Grade II Listed Buildings, an Ancient Scheduled Monument and a Grade II* Listed Park and Garden. Any potential re-development of the Site can be sensitively designed and master planned to ensure the significance of the Site, not only the Listed Buildings but also the character and appearance of the Conservation Area, can continue to be preserved and enhanced moving forward. Any potential re-development of the Site should be managed through the Development Management process, whereby the Council will have a Statutory Duty to comply with National Guidance regarding the identified Designated Historic Assets on site. Potential re-development of the Site should not be managed through a Green Belt designation in this context.

- 3.51. The boundary of the Site is tightly defined with surrounding walls and railings which will provide a natural limitation on the potential extent for any re-development of the Site. The existing boundaries already provide a distinction between the Site and the surrounding green space associated with the Walmgate Stray and the wider Green Belt. Therefore, the special character of Walmgate Stray, which is considered to contribute to the setting and special character of the City of York, would not be adversely affected by the exclusion of The Retreat Estate from the Green Belt given the distinctly different character between the two areas. The Site's historic character can be controlled and maintained as part of the Development Management process moving forward. This proposed justification for the Site's inclusion within the Green Belt is not justified as it is not considered to fulfil the role of preserving the setting and special character of the historic town. Notwithstanding this, the adjacent Walmgate Stray is considered to adequately fulfil this role within this location.
- 3.52. The development potential of the site, and therefore the setting and special character of the City of York in this location, is completely controlled by Historic Designations such as the Site's location within the Conservation Area; the Listed Buildings on site; the areas of the site within the curtilage of the Listed Buildings; the Ancient Scheduled Monument on site; and the areas of the Site located within the Historic Park and Garden. The adjacent Walmgate Stray also adds to the protection of the setting and special character of the City of York in this location, in this respect. There is no justification or evidence to include 'The Retreat' within the Green Belt in this context and no evidence to support attributing this Green Belt purpose to the Site within this location.

Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict land and other urban land

- 3.53. We respect that this purpose has not been attributed to the sections of Green Belt land which follow the urban boundary of the site, but for consistency it is vital that we further state the case for the lack of conformity between 'The Retreat' and the Green Belt purposes.
- 3.54. Following this, it would then seem illogical to retain the Site within the proposed Green Belt.
- 3.55. This site is partially brownfield and includes a number of buildings as previously specified. The existing services at the hospital have been reduced with all remaining inpatient services ending in December 2018. Fortunately 70% of jobs have been saved through the transfer of services, which without some form of re-development, will ultimately lead to the buildings being at risk of falling into disrepair.
- 3.56. Any potential re-development will ensure the protection of the Site, the Registered Park and Garden, all Listed Buildings and the on-site Ancient Scheduled Monument. Any potential re-development of the Site would therefore ensure that the buildings are protected, given their importance to the setting and special character of York.
- 3.57. The land associated with the Site forms part of the wider Retreat Estate. The Retreat are in discussions with CYC regarding the development potential of the wider Estate with a view to ensuring that the Site does not fall into disrepair moving forward. The redevelopment of the Site would be in line with Government policies to encourage the recycling of derelict land and other urban land and therefore this Green Belt purpose is not relevant to the Site.

3.58. The above Section has outlined that 'The Retreat' does not meet any of the identified Green Belt purposes and should therefore be excluded from the Green Belt in the emerging Local Plan. In addition to this, there is a severe lack of evidence and justification from CYC which supports the Site's inclusion within the Green Belt in this respect.

TP1 Addendum - Annex 3: Inner Boundary Descriptions and Justifications – March 2019

3.59. Subsequently York City Council state that 'The Retreat' meets the following purposes, specified below, all of which we dispute as evidenced above;

- **Purpose 2** – Land to the rear of William Plows Avenue and to the south of the built elements of The Retreat sit within Walmgate Stray but also Areas to the south of the retreat are also identified as within green wedge.
- **Purpose 3** – Land west of University Road (The Retreat) is designated as natural/semi natural greenspace (Walmgate Stray) and is part of a district green corridor¹⁸, so it performs a role in safeguarding the countryside from encroachment.
- **Purpose 4** – Boundary is adjacent to the Retreat and Heslington Road conservation area therefore the area was identified as important in preserving the setting and special character of York.

¹⁸ TP1 Addendum - Annex 3, p 410.

- 3.60. We note that the above justification for attributing purpose 2 is incorrect, it's illogical to think the site performs a role in preventing neighbouring towns from merging into one another as it is the Walmgate Stray that provides this role in this location.
- 3.61. Further we want to clarify that the Conservation Area Designation is managed through the Development Management process therefore this is not justification for a Green Belt designation of such land in its own right. The justification for attributing purpose 4 to this site is therefore not considered to be appropriate in this context.
- 3.62. Considering the above, we do agree to some extent that Walmgate Stray has historical importance as common grazing land and is presently maintained open space. However, as outlined above, there is a severe lack of evidence and justification from CYC which supports the Retreat Estate's inclusion within the Green Belt in this respect.
- 3.63. It is fully understood that 'The Retreat' site is set in parkland surrounded by high walls with views out and a series of gardens and adjoining parkland, which presents a very varied landscape which consists of open space on the edge of the city, which lead the parkland and Walmgate Stray to be synonymous landscapes that read well together.
- 3.64. Further we agree that the proposed boundary around 'The Retreat' contains historical features which have been established for a significant period of time.
- 3.65. From this we agree that when drawing up boundaries it is easier to define them by following physical boundaries such as walls, roads and established hedges. However, we are of the view that the boundary around the Site as discussed above should be redrawn to the southern boundary of the site which would still ensure that the urban area is contained in an area where it meets more open land uses.

- 3.66. Further as is argued by the Council, through realigning the boundary in this location, the layering of different boundary features in the form of historical and natural features would still ensure the required permanence which would be strengthened and offer resilience to change.
- 3.67. We would also agree that the Boundary to the West of the site separates areas of distinctly different character and follows the boundary of York Cemetery. However, we would like to outline that through restricting development in this location by the proposed Green Belt Designation, the Council are not effectively promoting sustainable patterns of development nor channelling development towards urban areas inside the Green Belt boundary¹⁹. In addition, when identifying land to be released from the Green Belt, plans should first give consideration to land that has been previously developed²⁰.
- 3.68. It's noted that not all of the Site is previously developed however, the northern half of the Site is, and through removing a poor performing part of the Green Belt in this location, the Council would effectively be ensuring that they are offsetting any harm to it through compensatory improvements, not only to the landscape and local environmental vernacular, but to the local setting and character of the Listed Buildings which will require some form of development to ensure their longevity.
- 3.69. Therefore, due to aspects of the Site being no longer being fit for purpose, the Site not meeting any of the identified Green Belt purposes, and there being more appropriate areas to locate the boundary that would not stifle growth, the Green Belt land which washes over 'The Retreat' should be removed. The proposed Green Belt designation of the Site is in disagreement with the Council's view of the weight to be applied to the purposes of the Green Belt in this location.

Recommendation 4: *CYC should commit to undertaking a full Green Belt Review in the interests of releasing sufficient and appropriate land to meet the true housing requirement, in the interests of effective, justified planning, which is in accordance with the NPPF.*

Section 5 (Housing)

- 3.70. In short, we have fundamental concerns over York's strategic approach to Housing delivery. Our principal comments relate to the un-aspirational reduction in the housing growth figures (Policy H1); the failure to adequately recognise and plan for the identified housing need in York (Policy SS1); the need for additional allocations in this respect; and the lack of Green Belt Release (Policy SS2) to fulfil such need in this context. Additional comments are also provided in relation to Affordable Housing (Policy H10).
- 3.71. The following points should therefore be considered in the interests of assisting CYC in the preparation of a Local Plan which can be considered to be Sound.
- 3.72. The Local Plan is being Examined under the transitional arrangements and is therefore Examined under the former NPPF (2012 version), however, it must be reviewed within 5 years from the date of adoption.

¹⁹ NPPF Paragraph 138

²⁰ NPPF Paragraph 137

- 3.73. The transitional arrangements for Local Plans and Neighbourhood Plans is set out in paragraph 214 of the revised 2019 NPPF, which provides 'The policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019'.

Policy H1: Housing Allocations

- 3.74. Draft Policy H1 outlines the proposed allocations for over the Plan Period. The current draft housing need figure (as included in the Public Draft Local Plan) is set at 867 dwellings per annum over the period 2017 to 2032/33, however, following the Council's adoption of the 2016 household formation figures and recommendations within the GL Hearn Housing Needs Assessment, both of which suggest lowering the Local Housing Need (LHN) to 790 dwellings per annum over the same period.

- 3.75. We strongly contest the reduction of these figures and the evidence base behind this fundamental decision. Our concerns in this respect are outlined in more detail as follows:

- 3.76. The Government is very aware of the limitations within the 2016 household figures and stresses that the 2016-based household projections are likely to demonstrate lower projected household growth, particularly for those Local Authorities in the north of England. The Government therefore recommend that such figures should no longer be utilised if, in doing so, this results in a reduction in housing need in this respect.

- 3.77. Looking at the GL Hearn Report (p.7), it is possible to compare the 2016-based Sub National Population Projections (SNPP) with the previous full set of projections (the 2014-based SNPP for York). This shows that the latest projections show a significantly lower level of population growth (12,000 fewer people – equivalent to a 41% reduction in projected population growth) over the 2016-39 period. It is therefore recommended that the projected population growth of 29,622 should be used which is taken from the 2014-based SNPP.

Standardised Methodology

- 3.78. The policy is explicit in that its rationale is based on the MHCLG Standardised Methodology figure. Clearly MHCLG has changed its advice regarding the way Local Authorities should calculate housing need, now preferring the standard methodology approach, using the 2014-based SNPP.

- 3.79. Through the revised NPPF, the Government has introduced a standard method which essentially involves three steps. Step 1 is to take the household projections over a ten year period to work out the projected growth in households. Step 2 requires an adjustment for affordability, therefore in areas where there is the greatest disparity between average house prices and average wages, there is an upwards adjustment for the number of houses required. Stage 3 involves the imposition of a cap can be up to 40% of the increase and is determined by how old the Local Planning Authority's strategic policies on housing are.

Demographic Baseline target

- 3.80. In respect of establishing the housing need when calculating five year housing land supply, PPG (reference 03-030) states that:

“The housing requirement figures identified in strategic policies should be used as the starting point for calculating the 5 year land supply figure:

- *for the first 5 years of the plan, and*
- *where the strategic housing policies plans are more than 5 years old, but have been reviewed and are found not to need updating.*

3.81. The reviewed and adopted strategic policies, and policies for the purpose of this representation are now more than five years old. Whilst the plan is being reviewed in the form of the new Local Plan, the process has not been concluded and therefore such strategic policies cannot be regarded as up to date strategic policies for the District as yet, as such Policies are still subject to Local Plan Examination.

3.82. The consultation document for the Government’s proposed approach states in the short term the 2014-based data²¹ should provide the demographic baseline rather than the 2016 version due to a significant reduction in housing need. Therefore, it is strongly recommended that the standard method (SM) should be used as the basis for calculating the minimum housing requirement.

3.83. In accordance with the NPPF and PPG updates regarding the use of stage 1, 2014 Household projections of 800 dpa (see appendix 2) and a stage 2 2018 Affordability Ratio of 8.86 (adjustment factor of 1.30375) dated April 2019, the annual target is calculated as 800 dwellings per annum or 5215 dwellings over the five year period. No stage 3 cap is necessary as it does not meet the thresholds.

Recommendation 5: *Revert to the 2014 base-data in line with Planning Practice Guidance (Paragraph: 005 Reference ID: 2a-005-20190220).*

Housing Need

3.84. The Council state that they aim to meet an objectively assessed housing need of 790 new dwellings per annum for the plan period to 2032/33, including any shortfall in housing provision against this need from the period 2012 to 2017, and for the post plan period to 2037/38.

3.85. The Plan’s Examination under the transitional arrangements therefore allows the use of the old LHN figure (formerly OAN), as opposed to the SM which is based on evidence in the SHLAA 2017/18 report. The 2016-based SNPP therefore demonstrates a decline in household formation rates compared to past trends.

3.86. It’s important to consider what the different scenarios and assessment outputs for determining the true housing need for York would be in the future when it will become mandatory to adopt one of the methodologies discussed.

²¹ PP Guidance (Paragraph: 005 Reference ID: 2a-005-20190220).

- 3.87. The NPPF explicitly states at paragraph 60 that Local Plans should be based on the SM, it goes on to state that these should be the starting point, altered to reflect local circumstances through an up to date Local Housing Needs Assessment. Prior to the adoption of NPPF 2018 in July and latter update in 2019, the evidence base cannot be regarded as being up to date given the significant policy shifts which have occurred during this time.
- 3.88. This said, the Council should revert to the 867 dpa figure given that the Standard Method is just the starting point for calculating local housing need (LHN), therefore the 800 starting point figure (Please see Appendix 2) with an appropriate economic uplift would be more appropriate.
- 3.89. Here we note that the 2014 SNPP figures suggest a more appropriate figure of 867 dpa, whereas the 2016 SNPP figures which we are greatly concerned with, suggest a target of 790 dpa. We are of the view that a figure of between the range of 997 dpa – 1,080 would be more appropriate in line with recommendation 7.
- 3.90. For instance, in taking the past formation rates from 2004-2014, there is a danger that this captures and then projects the negative growth associated with the 2007/8 economic recession which would therefore include an inaccurate reflection of York's actual Housing Need. As such, a figure with an appropriate economic uplift would seem to be a more appropriate starting position.
- 3.91. Further, MHCLG have stated that these figures should be taken as the minimum, a base from which to build²².

Buffer

- 3.92. To meet NPPF requirements for the plan to be positively prepared and flexible, a buffer should be sufficient to deal with any under-delivery which is likely to occur from some Sites. It is vital the Council produces a plan which can deliver against its full housing requirement. In order to do so, it is important that a strategy is put in place which provides a sufficient range of Sites to provide enough Sites to enable delivery to be maintained, at the required levels, throughout the plan period and that the plan allocates more Sites than required to meet the identified housing requirement with a sufficient buffer of 20%.
- 3.93. With regards to the proposed housing need figures, we have significant concerns regarding the evidence base for lowering these figures twinned with the poor rationale within the June 2019 GL Hearn Report. The GL Hearn Report points to establishing a need for 790 dwellings each year (paragraph 3.19) lowered from 867, which appears explicitly post-rationalised in the context of the MHCLG 2017 Draft Standardised Housing Methodology (SM).

²² Source: DCLG (2017) Fixing our broken housing market

- 3.94. Our recommendation is that City of York Council should further update their evidence base in line with the NPPF guidance on Local Housing Needs Assessments and in doing so, adopt a cautious approach to relying on the Standardised Methodology figures if the 2016 base data figures are utilised, in order to plan positively for the future regeneration of its main urban areas in line with its strategic vision.

Recommendation 6: *CYC should update their evidence base in line with the new NPPF, taking into account the revision of the draft Standardised Methodology calculations and planning positively to meet the economic aims and ambitions of the district. In the interests of justified and positive plan making.*

York – Housing Need Paper 2019 – GL Hearn: Economic Uplift

- 3.95. This section of the plan seeks to confirm the “policies and allocations to positively meet the housing development needs of the city”. We maintain for the reasons given above and as set out in extensive previous representations by Carter Jonas and JLL, the proposed housing allocations will not meet the appropriate level of OAN for the City over the plan period. In this respect the plan is not considered to be sound, justified, effective or in accordance with national policy. Further to this, policy H1 is intrinsically linked to Policy SS1 and comments should be read in the context of what has been said above.
- 3.96. GL Hearn’s Housing Need Report (January 2019) is the is the latest, justified evidence base which under paragraph 35 of the 2018 NPPF should be reviewed and used as part of the plan making process in absence of any new Local Housing Assessment.
- 3.97. This work has updated the demographic baseline for York based on the July 2016 household projections to 790 per annum from 867 dpa. Following consideration of the outcomes of this work, the Council states that it aims to meet an objectively assessed housing need of 790 new dwellings per annum for the plan period to 2032/33, including any shortfall in housing provision against this need from the period 2012 to 2017, and for the post plan period to 2037/38.
- 3.98. The Council state that they have applied a 15% uplift from an OAN of 557, leaving resulting in a 790 dpa figure. This said, we would agree that the 15% uplift is appropriate but should be applied to the 867 figure, leaving a revised LHN of 997 dpa.
- 3.99. The 15% figure was termed through research provided in the City of York (CoY) Housing Needs Update²³, where areas that are known to have severe affordability issues and have therefore used a 20% uplift figure. The 15% uplift figure is considered to be a good starting point in this respect however, an increased uplift figure of 20% as suggested may be more appropriate for the City of York given the longstanding affordability issues within this location.
- 3.100. Alternatively if you were to apply the 800 Standard Methodology figure mentioned previously to the 15% uplift (market signals adjustment) and the identified 20% buffer, this would ensure a target of at least 1,080 dpa is advocated for.

Recommendation 7: *The Council should adopt a more appropriate Local Housing Need (LHN) figure of between 997 dpa & 1080 dpa. This should be sufficient to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs.*

Updated Housing Trajectory

- 3.101. Nationally, there is a clear mismatch between permissions granted and homes completed. As a result of this, the 2018 and subsequent 2019 NPPF amendments have directly aimed to tackle this, with a greater emphasis on the quality of commitments and allocations, rather than quantity with reference to market factors. We are aware that due to this, Inspectors are increasingly focussing on the deliverability, developability and viability of Sites within Local Plans at Examination to ensure effective plan making which results in homes delivered to meet the housing crisis.
- 3.102. It is in this context that we offer this independent review of York's housing land supply, with reference to market trends, viability and our professional experience in respect of delivering the nature currently envisaged. From this we have explored how the figures set out in the plan should be reviewed and potentially revised upwards in the interest of justified and positive plan making.
- 3.103. It is of fundamental importance to state that York in terms of the market is a fairly un-constrained city compared to others, with a strong and viable housing market. However, it must be noted that a lot of the allocated Sites appear as brownfield Sites therefore their viability is not guaranteed. Of the Sites assessed, 12 out of the 19 are brownfield, equating to 63% of the trajectory.
- 3.104. To this end, we welcome the removal of allocations H59 (Queen Elizabeth Barracks, Strensall) and ST35 (Queen Elizabeth Barracks) from the trajectory due to the outcomes of the Habitats Regulations Assessment, to ensure the integrity of the Strensall Common Special Character Area. A further 545 units have been removed from the supply in this context which is welcomed given the uncertainty of the delivery of these Sites moving forward.
- 3.105. As above, for Sites to be included within the assessment of housing supply they must be considered deliverable in line with the definition contained within the NPPF²⁴ which states;

“ To be considered deliverable, Sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the Site within five years. In particular:

- a) Sites which do not involve major development and have planning permission, and all Sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or Sites have long term phasing plans).*
- b) where a Site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on Site within five years.”*

²³ GL Hearn - CoY Housing Needs Update, P.25.

²⁴ NPPF 2019 Page 66

*Developable²⁵: To be considered developable, Sites should be in a suitable location for housing development with a **reasonable prospect** that they will be available and could be viably developed at the point envisaged.* It is these definitions which have been used to assess the evidence and trajectory set out by York over the Local Plan Period.

Latest Supply Position

- 3.106. We understand that, from the Housing Monitoring Report and subsequent October 2018 update, between 1st April 2017 and 30th September 2018 there have been 1,587 net completions in York.
- 3.107. Using the Council's evidence, this demonstrates a gross supply of **18,055** dwellings as at 1st July 2019, made up of 1,587 in completions (over years 17/18 and 18/19 to date) and 14,271 in allocations. The windfall allowance is based on 169 dwellings per annum and will come into force in year 3 of the plan period (2020/21).

Methodology and Assumptions

- 3.108. PPG 3-017 to 023 recommends that reference should be had to local policy on densities, the strategic location within the emerging strategy, land ownership, delivery record, viability, lead in and build out rates and a list of technical constraints including the following which may limit the amount of development which is able to come forward:
- Physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
 - Potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;
 - Appropriateness and likely market attractiveness for the type of development proposed;
 - Contribution to regeneration priority areas; and, environmental/amenity impacts experienced by would be occupiers and neighbouring areas.
- 3.109. The supply analysis within this section has been undertaken to evaluate the housing land supply position across the full plan period from 1st April 2017 to 1st April 2033. As such, the position is likely to change over time and thus figures stated in this analysis should be viewed as an indication of the current level of supply.
- 3.110. It is in this context that we have offered this independent review of York's housing trajectory to test the supply assumptions set out within their Local Plan, with reference to market trends, viability and our professional experience in respect of delivering the nature currently envisaged by the Government.
- 3.111. This will then allow for a noticeable indication of whether further Sites will be needed to bridge the gap between need and supply, further stressed through the changes in the Council's housing trajectory update, (EX CYC 16).

²⁵ NPPF 2019 Page 66

- 3.112. Savills' desktop assessment has assessed all Sites of 100+ units, some of the build out rates will remain the same with some being altered. Principally, the allocations assessed have been made using assumptions on Site lead in and built out rates which we have concerns with, due to market saturation/deliverability
- 3.113. The assessment has been undertaken in two phases:
- Review of emerging policy position and recorded completions from 1st April 2017 and 30th September 2018 as above;
 - Desktop review of Sites, including current planning consents and relevant technical constraints via online mapping and proposals maps (see appendices 3 and 4).
- 3.114. The desktop review is shown in two parts as follows:
- Part 1 (Appendix 3) – Savills detailed assessment of Sites not fully deliverable within the plan period;
 - Part 2 (Appendix 4) - Savills Full Assessment of York's Housing Trajectory 100 + units.
- 3.115. This assessment has utilised documents EX CYC 16 (SHLAA Figure 6 Update), land registry searches to review site ownership and York's Public Access Search Engine.
- 3.116. Please note this desk based assessment is our professional opinion of the current market and no detailed assessment or Site visits have been undertaken. Please also note that no direct liaisons have been undertaken with the relevant marketing agents apart from Site S5 and as such, there may be unforeseen limitations with the aforementioned Assessment in this context.
- 3.117. Following the desktop review, we have significant concerns with the deliverability/viability of the following seven Sites up to 2033:
- ST1a – British Sugar/Manor School – will deliver 898 units (under delivery of 202 units);
 - ST5 – York Central – will deliver 1144 units (under delivery of 556 units)
 - ST7 – Land East of Metcalfe Lane – will deliver 700 units (under delivery of 145 units);
 - ST14 – Land to West of Wiggington Road – will deliver 665 units (under delivery of 683 units);
 - ST15– Land to West of Elvington– will deliver 630 units (under delivery of 2,709 units);
 - ST17 – Nestle South (Phase 2) – will deliver 540 units (under delivery of 60 units);
 - ST36 – Imphal Barracks, Fulford Road – will deliver 100 units (under delivery of 500 units).
- 3.118. By way of commentary, the discussed assessment shows that in some instances, there are deliverability issues in terms of access, Site ownership, remediation, need for green belt release, remoteness of the Sites, as follows:
- ST1a – The Site has viability issues relating to high remediation costs, due to on Site contamination however, remediation works have started and are ongoing. The Site also sits within Flood Zones 2 and 3, with a reserved matters application still to be submitted;

- ST5 – The Site has significant remediation costs and viability issues could slow delivery and lead in times. Notwithstanding this, the delivery of 8 dwellings per month is considered to be reasonable in this central location. Given the stated figure within the trajectory is overly ambitious, there is anticipated to be an Under Delivery of 1,356 units against the permission figure of 2,500 and 556 units against the allocation figure of 1,700 (556 figure has been utilised in Savills Assessment – please refer to Appendix 3 for further details);
- ST5 is identified within Policy SS4 of the Local Plan which states that York Central is allocated for 1,700-2,500 dwellings of which a minimum of 1,500 will be delivered in the plan period. As outlined at appendix 3, we consider that 1,144 units will be delivered in the plan period, which is considered to be more realistic and achievable. We must also note that the above site is being marketed by Savills but the opinions expressed within this representation are in the context of the Green Belt review comments and the un-realistic trajectory set by the Council. The application which is currently under determination is in outline form (18/01884/OUTM) and is yet to be determined.
- ST7 - No application pending, therefore given the scale of the development, delivery is not expected on Site until at least years 5 or 6, subject to the submission of an application moving forward. In the absence of any forthcoming application, this would further necessitate the need for additional allocations;
- ST14 - No application pending, therefore the delivery of the Site is unlikely to come forward as intended in the Council's trajectory. In addition to this, the Site has access constraints, given its location away from the road, therefore access would need to be taken from a ransom strip which is not within the developer's ownership. As such, the deliverability and viability of the site may be affected in this context. In addition to this, as the Site is not within a single ownership, this may cause further complications and delays moving forward;
- ST15 - No application pending, given the scale and rural remote location of the development, delivery is not be expected on Site until at least years 7 as the Site has constraints given its use as a former airfield. The Site will also need removing from the Green Belt therefore the development of the Site is unlikely to be progressed to an application until the Local Plan is reviewed in 5 years, following which construction can begin. Delivery will therefore be expected to start in year 9 of the plan period at the earliest, but not at the rate envisaged by the Council;
- ST17 - No application pending, therefore delivery will be dependent on the full delivery of Phase 1 which does not have any application pending either. The site may be delivered in the plan period but this is dependent on lead in times;
- ST36 - No application pending. The Site is considered to be heavily constrained. There will need to be applications submitted before works can begin to demolish existing buildings on Site, from this subsequent remediation works and associated applications will be required. This will likely result in a long lead in timescale however the identified trajectory prepared by the Council is considered to be appropriate in any event.

Recommendation 8: Site ST15 may not be suitable for Green Belt release. This is particularly relevant in the context of other Sites such as 'The Retreat', which is considered to be a more deliverable site and a more suitable site for Green Belt release.

Summary

- 3.119. As outline above, we understand that some Sites will be fully developed by 2038 as evidenced in the Council's housing trajectory, however, as the plan period runs until 2033, this is where our independent assessment of York's trajectory concludes.
- 3.120. Our independent assessment has provided a shortfall within a range of between 5,076 & 5,655 units over the plan period, due to a slight difference between the allocations figure and the actual commitments figure (change due to new permissions since EX CYC 16 was published). York Central (ST5) is the only Site within appendix 3 which has increased its delivery from 1,700 to 2,500 units. This is due to a planning application being submitted, which will evidently impact on the trajectory which has been considered as part of this assessment.
- 3.121. Our independent assessment reveals a shortfall in the supply in the range of 5,078 and 5,655 units to 2033, with the Council only being able to plan for between 68.7% and 71.9% of their identified LHN. This could lead the draft plan potentially being found unsound at Examination.
- 3.122. In addition to this, when the Local Plan is to be reviewed moving forward, there will likely be a shortfall identified that will need to be met, through safeguarded land and new housing allocations. Such allocations should be identified now whilst the Council has the opportunity to positively plan and identify such Sites, otherwise the Council may be at risk of significant windfall Sites coming forward in due course if they suffer from a long-term under-delivery. This is particularly relevant in the context of the deliverability test moving forward.
- 3.123. This representation therefore highlights that further work is essential to identify more deliverable and developable Sites before the Plan can be found sound and adopted.

Recommendation 9: *York should allocate further Sites in order to protect their supply and ensure that they meet the identified housing requirement, which is in danger of slipping due to market saturation and over-ambitious build out rates; creating a shortfall according to Savills of between 5,076 & 5,655 units over the plan period.*

Housing Delivery Test

- 3.124. York confirm at paragraph 4.4.10 of the January 2019 GL Hearn report that a 20% buffer should be applied in light of the past under delivery, therefore to make up any shortfall up to the first five years of the Plan would therefore use the Liverpool Method in dealing with inherited shortfall to enable a stepped increase in supply that the market can accommodate.
- 3.125. The principle of this is agreed and it is considered to be consistent with the results of the Housing Delivery Test which were published on the 19th February 2019. The Housing Delivery Test results for York identified a percentage of 102% delivery against an 85% threshold. As such, no buffer/action plan was considered to necessary for York however, the longer the City does not have an up to date adopted Local Plan, the longer the City is at risk of under-delivery and therefore an increased buffer in this context. Notwithstanding the above, a buffer is still to be applied to account for past shortfalls in delivery as mentioned and supported by Savills above. The approach is therefore considered to be in line with *PPG (03-037)* in principle.

Recommendation 10: *Ensure the delivery of growth does not stall through insufficient Site allocations as a result of the reduced housing target.*

Policy H10 – Affordable Housing

- 3.126. At this stage, the level of affordable housing that could be provided and what format this will take, is yet to be determined. The 2016 SHMA sets out the variations and definitions surrounding Affordable Housing.
- 3.127. Despite this, the current level of need for York is identified in Table 5.4 of the Local Plan. Given the characteristics of the Site and utilising this table, a contribution in the range of 20 – 30% will be expected.
- 3.128. We would also point out that the final affordable housing contributions, whilst typologies should be employed at the early stage to better build in viability at an early stage, should ultimately be open to negotiation through viability assessments where required to account for Site abnormalities and market changes.

4. Deliverability and Developability

- 4.1. The land at 'The Retreat' represents a deliverable and developable Site in accordance with the definitions contained within the NPPF which have been discussed in this representation and provide added context on the matter. We welcome feedback and discussion from York in terms of further targeted technical work in the interests of supporting a sound Local Plan.

Landscape, Environment and Topography

- 4.2. The Site will aim to make a positive contribution towards the management and enhancement of the landscape. The position of the Site provides the opportunity to reform a poor settlement edge with a new, clear defensible boundary.

Access, Highways and Transport

- 4.3. At this early stage no initial highways work has been undertaken however, given the urban location of the Site and its former hospital use, we are hopeful that this indicates that safe access and egress to the existing transport network can be successfully implemented; allowing for a swift start on Site subject to appropriate phasing.
- 4.4. In terms of public transport, the Site is within 130m of bus corridors along Heslington Road and connects to the existing facilities and schools along Heslington Road & University Road.

Deliverability

- 4.5. The Site is available and would be brought to the market once the principle of development has been confirmed. A Vision Document could be created which would serve to demonstrate that the Site is suitable and achievable by virtue of not having any technical constraints that will prevent its delivery.
- 4.6. Eminently speaking, the removal of the Site from the Green Belt to accommodate the potential re-development of the wider site, will help to ensure the preservation of the Listed Buildings on Site and potentially create much needed new housing in a sustainable location.



5. Summary and Conclusions

5. Based on the Proposed Modification or new evidence document indicated:

5. (1) Do you consider that the Local Plan is Sound?

Yes No

If yes, go to question 5. (3). If no, go to question 5. (2).

5. (2) please tell us which tests of soundness are applicable to 5. (1): (tick all that apply)

<i>Positively prepared</i>	<input checked="" type="checkbox"/>	<i>Justified</i>	<input checked="" type="checkbox"/>
<i>Effective</i>	<input checked="" type="checkbox"/>	<i>Consistent with national policy</i>	<input checked="" type="checkbox"/>

5. (3) please justify your answers to questions 5. (1) and 5. (2)

- 5.1. For the reasons set out in the context of these representations we do not consider the plan to be positively prepared, justified, effective or consistent with national policy at this stage.
- 5.2. The Retreat Site does not fulfil Green Belt purposes and therefore should not be included within the Green Belt moving forward, this is particularly relevant for the northern half of the Site which sits entirely within, and indeed forms part of, an urban built up area.
- 5.3. City of York Council should allocate additional Sites, even if this necessitates Green Belt release, given that it will not be possible to deliver 1,131 units per year up to 2038 with the current level of land available outside of the Green Belt. Our independent assessment determined this requirement through dividing the Savills identified shortfall over the five year period from 2033-38. This is in stark contrast to the 435 units per year that the Council would need to make up in the same period, using their trajectory and is why further deliverable Sites are needed, now.
- 5.4. In reviewing the above proposed allocations, several assumptions made by the Council are heavily reliant upon large brownfields Sites, the majority of which do not have planning consent as yet, therefore the deliverability of such Sites are still questionable. Further allocations are strongly recommended in addition to safeguarded Sites to ensure future provision is met.

6. (1) please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

- 5.5. For the reasons set out in this representation, and in line with our proposed recommendations below, we consider the Site should be excluded from the Green Belt as it does not fulfil the Green Belt purposes and represents a highly sustainable, deliverable and developable Site within the emerging York Local Plan. This is considered in line with the following recommendations:
- **Recommendation 1:** *City of York Council should at the very least reword their vision in line with the Regulation 19 Publication document in the spirit of effective, sound and justified plan making.*
 - **Recommendation 2:** *Add reference to Policy SS2 which should now read as follows- ‘The primary purpose of the Green Belt is to safeguard the setting and the special character of York and delivering the Local Plan Spatial Strategy. New buildings in the Green Belt is inappropriate unless it is for one of the exceptions set out in policy GB1. The general extent of the Green Belt is shown on the Key Diagram. Detailed boundaries shown on the proposals map follow readily recognisable physical features that are likely to endure such as streams, hedgerows and highways. To ensure that there is a degree of permanence beyond the plan period, additional land should be released from the General Extent of Green Belt to be safeguarded for development beyond the plan period as appropriate and further land should be allocated for development from this, to meet the needs identified in the plan and for a further minimum period of five years to 2038’.*
 - **Recommendation 3:** *York should redraw the Green Belt Boundary so that it follows the strong established boundaries of ‘The Retreat’ which are recognisable, substantial, physical and natural features which should sit outside of the Green Belt. In line with paragraph 129 NPPF 2019, these features are readily recognisable and permanent. The Retreat Estate should be excluded from the Green Belt.*
 - **Recommendation 4:** *CYC should commit to undertaking a full Green Belt Review in the interests of releasing sufficient and appropriate land to meet the true housing requirement, in the interests of effective, justified planning, which is in accordance with the NPPF.*
 - **Recommendation 5:** *CYC should revert to the 2014 base-data in line with Planning Practice Guidance (Paragraph: 005 Reference ID: 2a-005-20190220).*
 - **Recommendation 6:** *CYC should update their evidence base in line with the new NPPF, taking into account the revision of the draft Standardised Methodology calculations and planning positively to meet the economic aims and ambitions of the district. In the interests of justified and positive plan making.*
 - **Recommendation 7:** *CYC should adopt a more appropriate Local Housing Need (LHN) figure of between 997 dpa & 1080 dpa. This would be sufficient to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs.*
 - **Recommendation 8:** *Site ST15 may not be suitable for Green Belt release. This is particularly relevant in the context of other Sites should as ‘The Retreat’, which is considered to be a more deliverable Site which is also considered to be more suitable for Green Belt release.*

- **Recommendation 9:** *CYC should allocate additional Sites in order to protect their housing land supply and ensure that they meet the Local Plan's housing requirement, which is in danger of slipping due to market saturation and over-ambitious build out rates; creating a shortfall of between 5,076 & 5,655 units over the plan period, according to Savills assessment.*
- **Recommendation 10:** *CYC need to ensure the delivery of growth does not stall through insufficient Site Allocations as a result of the reduced housing target.*

7. If your representation is seeking a change at question 6.(1);

7. (1) do you consider it necessary to participate at the hearing sessions of the Public Examination?

- 5.6. Yes, Savills wish to appear at the Local Plan Examination in order to further discuss the points set out in this representation.

7.(2) If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

- 5.7. Savills welcome the opportunity to maintain engagement in the preparation of the review and would be happy to discuss any of the points raised within this report at the local plan examination hearing sessions. To this end, it is clear new Sites will need to come forward, beyond those allocated, to address the shortfall identified. We will also seek to meet with relevant Council officers during 2019 and beyond in the context of carrying out greater evidence base workings on the Site and supporting the council in delivering a sound Local Plan.



Appendices

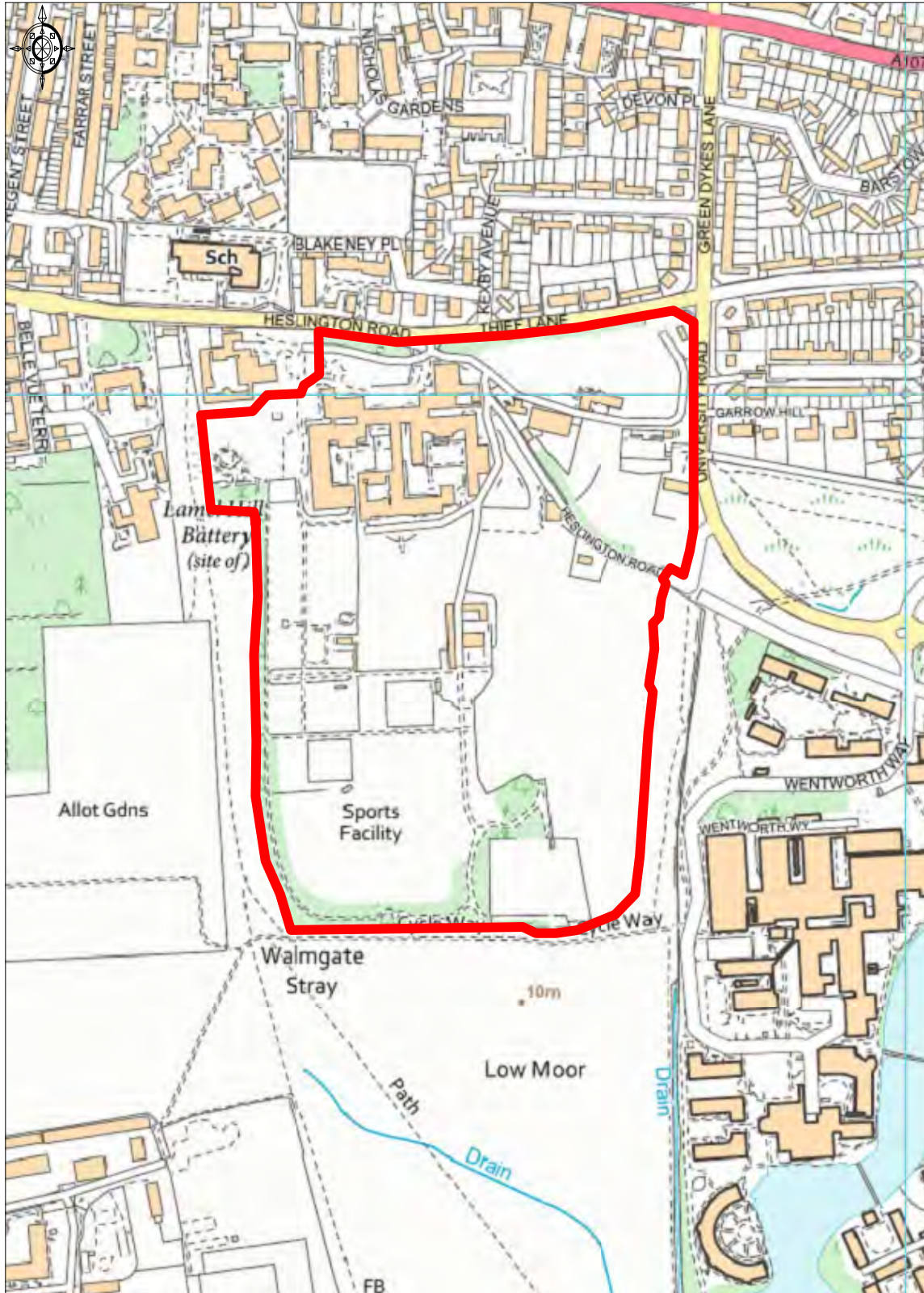


Appendix 1

The Retreat Site Location Plan

The Retreat, York

Site Location Plan



Promap
LANDMARK INFORMATION GROUP

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Appendix 2 Standard Method Calculation

LOCAL HOUSING NEED CALCULATOR

LPA: **York**
 Data: 2014 HHPs

2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031
91.000	92.000	93.000	93.000	94.000	95.000	96.000	97.000	97.000	98.000	99.000	100.000	101.000



Latest Affordability Data (year): 2018
 Latest Affordability Ratio: **8.86**
 SM Affordability Adjustment Factor: 1.30375 Caution: Max 1.40 (or max 40% over up-to-date plan requirement - whichever is the higher)

SM LHN (dpa):	2019/20-2023/24:	1043	SM LHN (5 yrs):	2019/20-2023/24:	5215
	2020/21-2024/25:	1043		2020/21-2024/25:	5215
	2021/22-2025/26:	1043		2021/22-2025/26:	5215



Appendix 3
Savills Assessment of York's – Undeliverable Sites

						0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15			
	Site Name	Planning Application Reference	Planning Application Approval Date	Site Type	Housing Number	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	Total Completions	Comments	
ST1a	British Sugar/Manor School	14/02789/OUTM & 15/00524/OUTM (14/02789/FULM & 15/00523/FULM remediation application) & 17/00029/NON	14/02789/OUTM - December 2018 14/02789 - September 2017 17/00029/NON - Appeal Allowed - related to 15/00524/OUTM	Brownfield	1100	0	0	0	0	35	35	72	84	84	84	84	84	84	84	84	84	84	898	Viability issues relating to high remediation costs, due to contamination. Remediation works ongoing. Site is within Flood Zones 2 and 3. Outline of scheme allowed on appeal in September 2018 after public inquiry. Reserved Matters still to take place, so it's likely that the scheme will not be fully built out by the end of the plan period. Access is taken from the Old Manor School playing fields. Using a built out rate of 7 dwellings per month from year 6 and of three per month from year 4. Under Delivery of 202 units.
ST5	York Central (Allocation for 1700 dwellings)	18/01884/OUTM	Decision Pending	Brownfield	2500	0	0	0	0	0	84	100	100	100	100	100	100	100	100	120	120	120	1144	The Site has significant remediation costs and viability issues which could slow delivery and lead in times. Notwithstanding this, the delivery of 9 dwellings per month is considered to be reasonable in this central location, given the stated figure within the trajectory is overly ambitious. There is anticipated to be an Under Delivery of 1,356 units against the permission figure of 2,500 and 556 units against the allocation figure of 1,700 (556 figure has been utilised in Savills Assessment - please refer to Appendix 3 for further details). York Central is allocated for 1,700-2,500 dwellings of which a minimum of 1,500 will be delivered in the plan period, we state at appendix 3 that 1,144 units will be delivered in the plan period, which is a realistic and achievable. The application is only in outline (18/01884/OUTM) and has yet to be determined. Under Delivery of 1,356 units against the permission and 556 against the allocation figure.
ST7	Land East of Metcalfe Lane	N/a	N/a	Mixed (90 Greenfield)	845	0	0	0	0	0	35	35	70	70	70	70	70	70	70	70	70	70	700	No application pending, so given the scale of the development, delivery will not be expected on Site until at least years 5 or 6, this is if an application ever comes forward. If it doesn't it would necessitate the need for further allocations. Under Delivery of 145 units.
ST14	Land to West of Wiggington Road	N/a	N/a	Greenfield	1348	0	0	0	0	0	0	0	35	70	70	70	70	70	70	105	105	665	No application pending, therefore the delivery of the Site will not come forward as intended in the Council's trajectory. In addition to this, the Site has access constraints, given its location away from the road, meaning access would need to be taken from a ransom strip that's not in the developer's ownership, meaning viability may be affected. Also the Site is also not within single ownership which may cause further complications and delays moving forward. Under Delivery of 683 units.	
ST15	Land to West of Elvington	N/a	N/a	Mixed	3339	0	0	0	0	0	0	0	0	0	35	70	105	105	105	105	105	105	630	No application pending, given the scale and rural remote location of the development, delivery will not be expected on Site until at least years 7 as the Site has constraints given its use as a former airfield. The Site will also need removing from the Green Belt therefore it is unlikely to be progressed to an application until the Local Plan is reviewed in 5 years, following which construction can begin. Delivery will therefore be expected to start in year 9 of the plan period at the earliest, but not at the rate envisaged by the Council. Under Delivery of 2,709 units.
ST17	Nestle South (Phase 2)	N/a	N/a	Brownfield	600	0	0	0	0	0	0	0	0	50	70	70	70	70	70	70	70	70	540	No application pending, therefore delivery will be dependent on the full delivery of Phase 1 which does not have any application pending either. The site may be delivered in the plan period but this is dependent on lead in times. Under Delivery of 60 units.
ST36	Imphal Barracks, Fufford Road	N/a	N/a	Brownfield	600	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	100	100	No application pending. The Site is considered to be heavily constrained. There will need to be applications submitted before works can begin to demolish existing buildings on Site, from this subsequent remediation works and associated applications will be required. This will likely result in a long lead in timescale however the identified trajectory prepared by the Council is considered to be appropriate in this context. Under Delivery of 500 units.
Total					10332																			

Appendix 3
Savills Assessment of Housing Delivery in York - Undeliverable Sites
01/07/2019

Totals	0	0	0	35	154	207	289	374	429	464	429	464	429	464	429	464	499	499	519	554	654
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Total	4677
Difference	5655



Appendix 4
Savills Full Assessment of York's – Detailed Housing
Trajectory

						0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15		
	Site Name	Planning Application Reference	Planning Application Approval Date	Site Type	Housing Number	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2031/32	2033/34	2035/36	2037/38	Total Completions	Comments
H1a	Former Gas Works, 24 Haverth Green	150079/OUTM - Planning Decision	N/A	Brownfield	271	0	0	0	0	0	0	0	35	35	35	35	35	35	35	35	271	Application was for 704 units and was only validated on 02 May 2019. Given the scale of the proposed development and the fact 35 is a 50% increase, Reserved Matters approval will be required. Delivery cannot reasonably be expected until 2024/25 will be complete by year 12. Site is fully deliverable within the Plan Period.	
H6	Leafield School	170025/OUTM & 150025/FULM	Aug 2018 & March 2019	Brownfield	162	0	0	19	35	35	35	38									162	Some of the site is to be turned into a communal living scheme. Outline application was submitted and approved in 2018. With a Full application for 19 units approved in March 2019. We anticipate the build out rates envisaged by the Council to be planned back a year given over 12 have had Full consent approved. Site is fully deliverable within the Plan Period.	
H10	The Barbican	N/A	N/A	Brownfield	187	0	0	0	0	0	0	0	0	0	0	23	24	35	35	35	187	No Planning in place, site will remain empty. Therefore it can be expected that within the next 5 years the site will not come forward. The site may be available for other developments.	
H46	Land to the North of Wilton Bank and East of Healy Road, New Earwick	N/A	N/A	Greenfield	154	0	0	0	0	0	35	35	34								154	No application lodged. So delivery is unlikely to start as anticipated by the Council in 2019/20. The site is fully accessible and under single ownership. Site is fully deliverable within the Plan Period.	
ST1a	British Sugar/Monor School	140278/OUTM - December 2016 140278/OUTM - September 2017 150023/FULM - Appeal Allowed - 17/00029/NKN & 17/00029/NKN 150024/OUTM		Brownfield	1100	0	0	0	0	35	35	72	84	84	84	84	84	84	84	84	84	1100	Validity issues relating to high remediation costs, due to contamination. Remediation works ongoing. Site is within Flood Zones 2 and 3. Outline of scheme allowed on appeal in September 2018 after public inquiry. Reserved Matters still to take place, so it is likely that the scheme will not be fully built out by the end of the plan period. Access is taken from the Old Manor School playing fields, being a built out rate of 7 dwellings per month from year 6 and of three per month from year 4. Under Delivery of 202 units.
ST1b	Manor School	As Above	As Above	Brownfield	100	0	0	0	0	6	35	35	30								100	Same as above, due to part of this site being used for access into the above site, delivery will be slower than expected. Site is fully deliverable within the Plan Period.	
ST2	Former Old Service Sports Ground, Millard Lane	140229/FULM & APP/CC2/14/191922/3/0	Decision Pending	Brownfield	266	0	0	0	0	0	35	23	35	35	35	35	35	33			266	Miller Homes submitted an application in December 2014 for 266 dwellings. An appeal was submitted in May 2019 against the failure of York Council to issue notice of their decision. Given the appeal and the time required if successful to ready the site for construction, discharge conditions etc, delivery will be expected from year 5 and be completed by year 12. Sites ST1a and ST1b all within the same ERA so delivery in year 5 will be restricted to 1750pa split between the three sites. Site is fully deliverable within the Plan Period.	
ST4	Land Adj to Hill Road (Allocation for 211)	1500196/FULM & 1500167/FULM	Decisions Pending	Greenfield	269	0	0	0	35	35	35	35	35	35	35	35	24				269	1500196/FULM - for 190 units & 1500167/FULM for 69 units - Allocation is for 211 units but pending applications are for 249 units. 35dpa is an acceptable trajectory for this site. Delivery has been tracked back one year due to the pending status of the application which will still need at least 12 months before construction starts on site. Site is fully deliverable within the Plan Period.	
ST5	York Central (Allocation for 1700 dwellings)	1801884/OUTM	Decision Pending	Brownfield	2500	0	0	0	0	0	84	100	100	100	100	100	100	100	120	120	120	1144	The site has agreement remediation costs and viability issues which could slow delivery and lead to losses. Notwithstanding this, the delivery of 8 dwellings per month is considered to be achievable in the central location, given the stated figure within the trajectory is overly ambitious. There is anticipated to be an Under Delivery of 1,356 units against the permission figure of 2,500 and 556 units against the allocation figure of 1,700 (556 units on either side of the assessment - please refer to Appendix 3 for further details). York Central is allocated for 1,700-2,500 dwellings of which a minimum of 1,500 will be delivered in the plan period, we state at appendix 3 that 1,144 units will be delivered in the plan period which is a realistic and achievable. The application is only an outline (1801884/OUTM) and has yet to be determined. Under Delivery of 1,356 units against the permission and 556 against the allocation figure.
ST7	Land East of Metcalf Lane	N/A	N/A	Mixed (60 Greenfield)	845	0	0	0	0	0	35	35	70	70	70	70	70	70	70	70	70	700	No application pending, so given the scale of the development, delivery will not be expected on site until at least years 3 or 4. If an application ever comes forward, if it doesn't it would necessitate the need for further allocation. Under Delivery of 145 units.
ST8	Land North of Monk Cross (Allocation for 970)	1800019/OUTM	Decision Pending	Greenfield	970	0	0	0	35	70	70	70	70	70	60	105	105	105	105	105	970	Allocation is for 958 but an outline application is currently pending since January 2018 for 970 units. So Reserved Matters is still required before construction can commence. Site is fully built out by year 14 of the plan period.	
ST9	Land North of Healy	N/A	N/A	Greenfield	735	0	0	0	0	0	35	70	70	70	70	70	70	70	70	70	735	No application lodged. Newly constrained site with little evidence base. Site is located within the Green Belt so will require release. Site is fully built and has not at the site marked.	
ST14	Land to West of Wiggington Road	N/A	N/A	Greenfield	1348	0	0	0	0	0	0	35	70	70	70	70	70	70	70	105	105	665	No application pending, therefore the delivery of the site will not come forward as intended in the Council's trajectory. In addition to this, the site has access constraints, given its location away from the road, meaning access roads need to be taken from a nearby road which is in the developer's ownership, meaning viability may be affected. Also the site is also not within single ownership which may cause further complications and delays to come forward. Under Delivery of 683 units.
ST15	Land to West of Evington	N/A	N/A	Mixed	3330	0	0	0	0	0	0	0	0	35	70	105	105	105	105	105	105	630	No application pending, given the scale and total remove location of the development, delivery will not be expected on site until at least years 7 as the site has constraints given its use as a former airfield. The site will also need removal from the Green Belt therefore it is unlikely to be progressed to an application until the Local Plan is reviewed in 5 years, following which construction can begin. Delivery will therefore be expected to start in year 8 if the plan period at the earliest, but not at the rate anticipated by the Council. Under Delivery of 2,700 units.
ST17	Needle South (Phase 1) (Allocation for 263 units)	1001958/OUTM - Withdrawn & 1602312/EA/IN - Reserved option to use if EIA is required	EIA not required - November 2016.	Brownfield	263	0	0	0	35	50	50	50	50	28							263	No application pending. Delivery in line with Phase 2 site which will be delivered after phase 1.	
ST17	Needle South (Phase 2)	N/A	N/A	Brownfield	600	0	0	0	0	0	0	0	0	50	70	70	70	70	70	70	70	540	No application pending, therefore delivery will be dependent on the full delivery of Phase 1 which does not have any application pending either. The site may be delivered in the plan period but this is dependent on land release. Under Delivery of 60 units.
ST21	Land to the South of Tadcaster Road, Copmanshoepe	N/A	N/A	Greenfield	158	0	0	0	35	35	35	35	18								158	No application pending. But given scale of site, delivery will be possible within the Plan period.	
ST32	Hargate (Phase 5) (Block D / H)	1802046/FULM	Decision Pending	Brownfield	328	0	0	0	198	0	142										328	Delivery in line with the Council trajectory, given advanced nature of planning applications, plus delivery of a residential apartment block has already been agreed and outline submitted.	
ST33	Station Yard Whitehale	N/A	N/A	Brownfield	147	0	0	0	35	35	35	7									147	Delivery in line with the Council trajectory. But not current application pending.	
ST36	Imperial Barracks, Fulford Road	N/A	N/A	Brownfield	600	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	100	100	No application pending. The site is considered to be mainly constrained. There will need to be applications submitted before works can begin to demolish existing buildings on site. From the subsequent remediation works and associated applications will be required. This will likely result in a long lead in time to release the identified trajectory proposed by the Council is considered to be appropriate in this context. Under Delivery of 500 units.
Total					14292																		

Appendix 4
Savills Full Assessment of Housing Delivery in York
01/07/2019

Totals	0	19	398	330	696	628	643	647	664	768	768	777	764	790	759
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Total	8637
Difference	5655

From: Grundy, Simon [REDACTED]
Sent: 22 July 2019 13:43
To: localplan@york.gov.uk
Subject: City of York Local Plan – Proposed Modifications consultation – response on behalf of L&Q Estates (formerly Gallagher Estates) [CJ-WORKSITE.FID414879]
Attachments: 190722 - CoYLP - North Field York reps - final.pdf; Appendix 1 - CJ North Field York reps - May 2018.pdf; Appendix 2 - Turley OAN Critique - 2019 Proposed Modifications.pdf; Appendix 3 - CSAE - A-Review of City of York Council Topic Paper 1.pdf; 190722 - L&Q Consultation Reps Form.pdf

Follow Up Flag: Follow up
Flag Status: Completed

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Further to the above, please find enclosed completed response form and associated representations statement and appendices.

I look forward to receiving acknowledgement of receipt.

With best wishes,
Simon Grundy
 Partner

Carter Jonas

[REDACTED] | carterjonas.co.uk
 First Floor, 9 Bond Court, Leeds, LS1 2JZ



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Carter Jonas LLP
 Place of Registration: England and Wales
 Registration Number: OC304417
 Address of Registered Office: One Chapel Place, London, W1G 0BG.

City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make.

Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Simon
Last Name		Grundy
Organisation (where relevant)	L&Q Estates – c/o agents	Carter Jonas LLP
Representing (if applicable)		L&Q Estates
Address – line 1	– c/o agents	Carter Jonas
Address – line 2		First Floor
Address – line 3		9 Bond Court
Address – line 4		Leeds
Postcode		LS1 2JZ
E-mail Address	– c/o agents	████████████████████
Telephone Number	– c/o agents	██████████

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

**Proposed Modification
References:**

PM3-PM5, PM29 – PM41 & proposals map

Document:

EX/CYC/14a - GL Hearne Housing Need Update 2019

EX/CYC/18 - Green Belt TP1 Addendum and appendices

Page Number:

N/A

What does ‘legally compliant’ mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is legally compliant?

Yes No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

Please see attached Carter Jonas statement of representations and appendices.

What does ‘Sound’ mean?

Soundness may be considered in this context within its ordinary meaning of ‘fit for purpose’ and ‘showing good judgement’. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework’s four ‘tests of soundness’ listed below.

What makes a Local Plan “sound”?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable

alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

Please see attached Carter Jonas statement of representations and appendices.

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

Please see attached Carter Jonas statement of representations and appendices.

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Given the significant issues under consideration by L&Q Estates it is appropriate for them to participate directly by attending the relevant hearing sessions.

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 2018 to inform the Local Plan process. We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't. City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

Signature 

Date **22 July 2019**

**CITY OF YORK LOCAL PLAN
PROPOSED MODIFICATIONS
(JUNE 2019)
REGULATION 19 CONSULTATION
RESPONSE**

REPRESENTATIONS

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Appendices

Appendix 1: Carter Jonas - Representations to the City of York Local Plan Publication Draft (Regulation 19 consultation) – April 2018

Appendix 2: Turley - Proposed Modifications to the York Local Plan: OAN Critique – July 2019

Appendix 3: CSA Environmental - Addendum to Landscape Overview – July 2019

1.0 INTRODUCTION & EXECUTIVE SUMMARY

- 1.1 Carter Jonas LLP welcomes the opportunity to make representations upon the June 2019 City of York Local Plan Proposed Modifications (the PMs) on behalf of L&QE Estates (formerly Gallagher Estates) (L&QE). These representations are pursuant to and cross-reference with previous representations by Turley at Preferred Sites and Pre-Publication Draft (Regulation 18) stages and Carter Jonas' Regulation 19 Representations (as enclosed at Appendix 1) to the City of Publication Draft York Local Plan (the PDP).
- 1.2 These representations have been prepared for the exclusive benefit of the respondents as set out in the report contents herewith. No other parties may use or duplicate the report contents without the written permission of Carter Jonas LLP.
- 1.3 L&QE has a controlling interest in the land at North Field, York, which Carter Jonas continues to promote for allocation for housing. The land is Site Reference 871 (please see below) within the Strategic Housing Land Availability Assessment (SHLAA) (2018). Our client is keen to work with the City of York Council to help ensure a sound Local Plan can be adopted as soon as possible. We will be pleased to engage with the Council upon matters of housing need and delivery, green belt review and site-specific matters to facilitate swift progress.



1.4 We have grave concerns over the modifications currently proposed and the overall soundness of the plan which will impact upon the timetable and prolong the continued failure to plan for the development needs of the City of York. Our specific concerns arising from this PMs consultation (along with the Plan as submitted) relate to the following, with cross-reference to the modifications main document and/or evidence base where appropriate:

- PM3-PM5 and associated amendments – The January 2019 Housing Needs Update and the Revised Objectively Assessed Need (OAN)
- The associated 'garden village' strategy for delivery of sufficient land to meet the OAN
- The Addendum to Topic Paper 1 - Approach to Defining York's Green Belt - March 2019
- Topic Paper 1 Addendum - Annex 3 - Inner Boundary Descriptions and Justifications

1.5 In summary our main representations are as follows:

The Housing Requirement

- As previously, the Vision and Outcomes are not justified or effective as they are not backed by sufficient evidence and/or positive policies to meet the identified housing need. The proposed modifications fail to address those concerns.
- The revised OAN housing requirement and the predicted housing supply remain unjustified, ineffective and inconsistent with national planning policy.
- In particular, the revised minimum annual provision of 790 new dwellings per annum is not based upon any robust objective assessment of need.
- The draft plan will not deliver sufficient new housing or the much needed boost to the level of supply indicated by the available evidence.
- Based on the available evidence, the plan should provide for a minimum of 1,069 new dwellings per annum.
- Even founded on a figure of 790dpa the plan proposes insufficient appropriate and sustainable housing land to meet its proposed requirement.
 - The spatial strategy still relies too heavily on a number of key large and/or complex sites, and over-optimistic and unsupported assumptions over both timing and number of dwellings to be delivered.
 - Indicative densities are too high, giving unrealistic yield per hectare assumptions and potentially resulting in poor quality development and lack of new housing choice and in particular a lack of family housing.
- By proposing a reduction to the previous unsound OAN of 867 dpa, the main modifications represent a fundamental change at a late stage of the local plan process and, as a result, the soundness of the plan is even further weakened.

The Green Belt and Strategic Growth

- The Council's negative approach to meeting the development needs of York is reflected in the approach taken toward to the Green Belt.
- The proposed Green Belt boundaries are unsound as they would unreasonably restrict more sustainable development opportunities for the necessary growth of York.
- The combined methodology in terms of defining the inner and outer Green Belt boundaries and allocation of development sites is flawed. CYC has produced a number of evidence base documents in respect of the green belt and historic setting of York between 2003 and 2019. However, no city-wide, comprehensive and objective assessment of green belt purposes has been undertaken. In this respect the plan is unsound.
- The inner boundary as proposed would be too tightly drawn to allow for housing development needs during the plan period and beyond.
- The PMs fail to revisit the spatial strategy for housing or to reconsider sustainable urban extensions as an appropriate alternative.
- The strategy of sustainable urban extension housing allocations should be re-introduced to make up the projected shortfall against the true OAN and improve future range and choice. To illustrate this opportunity:
 - The Outer Ring Road between Millfield Lane to the north and Main Street, Knapton to the south would make a strong Green Belt boundary to the NW edge of the city.
 - This would enable a sustainable urban extension to help meet the uplifted and appropriate level of housing need.
- The March 2019 Addendum to Topic Paper 1 - Approach to Defining York's Green Belt (the Green Belt Addendum) forms part of a flawed process that seeks to retrospectively justify proposed Green Belt boundaries that had already been selected long before the May 2018 submission.
- The Green Belt Addendum is the latest in a long line of green belt review documents, going back to 2003. However, rather than providing a comprehensive and robust evidence base, these documents represent a fragmented and piecemeal approach to considering appropriate, detailed Green Belt boundaries for the city.
- The draft plan is unsound and in conflict with the NPPF as no safeguarded land is proposed to help meet "longer term needs stretching well beyond the plan period".
- The Council's emphasis for the detailed inner boundaries is geared towards safeguarding "the special character and setting of the historic city" rather than establishing "long term development limits" that will (1) take into account necessary levels of growth and (2) "also endure beyond the Plan period".

OAN and Green Belt: Executive Summary

- In summary, the PMs highlight three fundamental flaws in the emerging local plan, namely:
 - A proposed OAN which seriously underestimates the true levels of extreme housing need that prevail across within the city;
 - Associated conflict with the National Planning Policy Framework aims and objectives requiring an “overall strategy” to achieve “sufficient provision for housing (including affordable housing)” and “delivering a sufficient supply of homes”;
 - Tightly drawn Green Belt boundaries and a lack of appropriate housing land which will prevent established needs being met within the plan period and beyond; and
 - A strategic distribution of new housing which will fail to meet both the established need and market requirements.
- In conclusion, the Council has chosen an unreasonably low OAN to help justify tightly drawn inner Green Belt boundaries that were originally proposed long ago.
- The March 2019 Addendum to Topic Paper 1 is an attempt to retro-fit an evidence base to justify those same inner Green Belt boundaries that fails both in terms of robust methodology and content.

1.6 We have provided a structured response which addresses the issues raised within the PMS consultation, as follows:

- Section 2 covers the housing requirement
- Section 3 relates to the Proposed Green Belt boundaries and evidence base
- Section 4 summarises our conclusions

1.7 We have completed a representation form to which this statement is attached and includes the request to participate in the examination.

2.0 THE HOUSING REQUIREMENT

PM3 – PM5 and Policy SS1: York Housing Needs and Delivering Sustainable Growth for York

- 2.1 Our previous representations confirmed that Policy SS1 was not sound as it was not positively prepared, effective or consistent with national policy for the reasons set out previously on behalf of L&QE/Gallagher. The PMs documentation does nothing to resolve this and the proposed reduction to the minimum annual provision of new dwellings pushes in the opposite direction.
- 2.2 Pursuant to the Turley OAN Critique (Appendix 2), preceding representations and wider evidence base, L&QE objects to the housing requirement being set at 790 dwellings per annum (DPA) and concludes that the OAN should be at a minimum of 1,069 DPA.
- 2.3 The Council's own evidence base, in the form of the GL Hearn Strategic Housing Market Assessment (May 2017 - the SHMA) clearly recommends that, based on their assessment of market signals evidence and some recent Inspectors decisions, the council should include a 10% market signals adjustment to the 867 figure, resulting in a requirement of 953 dwellings per annum.
- 2.4 The Plan ignores the supporting evidence base conclusions and provides no clear or sound justification for not making an adjustment for market signals in light of Government guidance. The Publication Draft Plan text at paragraph 3.3: Housing Growth was silent on the methodology behind the selection of the 867dpa figure, which was a failing in itself.
- 2.5 There are significant issues of housing affordability within the city which needs to be addressed and there is no evidence of any recent improvement in this respect. This is in breach of the NPPF core planning principle at paragraph 17, bullet point 4.
- 2.6 The decision makers at City of York Council Local Plan Working Group and Executive meetings in January 2018 had every opportunity to aim for a more reasonable, justified and positive target for housing delivery. This would have been fully supported and justified by the SHMA evidence base, officer recommendations (including suggested additional housing sites) and statements of case by many representors. However, the members of those committees failed to take this opportunity, choosing a figure based on only part of the GL Hearn findings. This approach is wholly unjustified and in breach of the aims and objectives of draft Policy DP1 as noted above.
- 2.7 The previous housing requirement of 867 per annum failed to comply with Planning Practice Guidance and the revised OAN under the PMS does nothing to rectify that situation, quite the contrary. As set out within the Turley report at Appendix 2, the 2014 population projections are a more appropriate factor in the calculation of OAN than the 2016 figures the council seeks to rely on.

2.8 Given the real prospects of the plan being found unsound at the earliest juncture, the council should allow for a significant increase from the 790 figure towards the 1,070dpa confirmed within the Planning for the Right Homes Publication Data spreadsheet. This is supported by the Turley OAN Critique report (Appendix 2) which concludes as follows

5.6 Drawing together the above, it is considered that in the order of 1,000 dwellings per annum are needed in York over the period from 2012 to 2037...

5.8 Our conclusions are consistent with evidence previously submitted by Turley on behalf of L&QE Estates. It is also proportionate to the current outcome of the standard method (1,069dpa) and the alternative assessments submitted by other representors during earlier stages of consultation, which suggested that up to 1,150 dwellings per annum are needed in York.

5.9 Within this context, the Council's proposal to lower its housing requirement and provide only 790 dwellings per annum is strongly challenged. This proposed modification has not been positively prepared, but has instead been motivated by an opportunity to provide fewer homes rather than seeking to meet the full need for housing in York. The proposed level of housing provision is not justified or consistent with the requirements of national policy and guidance. It is therefore considered that the modified Local Plan, like the submitted version, is unsound.

2.9 In summary, the proposed housing requirement and associated modifications at PM3 – PM5 are not justified or consistent with the NPPF. This should be resolved through a housing requirement based on a minimum OAN of 1,069 dpa.

3.0 GREEN BELT

EX/CYC/18: Green Belt TP1 Addendum and Proposals Map Modifications

- 3.1 The PMs and evidence base seek to provide further evidence for the selection of boundaries for the inner and outer Green Belt edges along with urban areas and proposed development sites within the General Extent of Green Belt.
- 3.2 We welcome the opportunity for the establishment of detailed Green Belt boundaries for the first time and consider that this issue goes to the heart of a sound plan for the city.
- 3.3 The CSA Environmental (CSAE) - Addendum to Landscape Overview enclosed at Appendix 3 supplements the previous representations on behalf of L&QE/Gallagher in respect of the CYC methodology for determining appropriate green belt boundaries for York.
- 3.4 We remain of the view that the evidence base provided by the council is comprised of a loose collection of documents emerging over a 16 year period and concerned that the proposed detailed green belt boundaries are based upon evidence that is out-of-date, going back as far as 2003 and preceding not only the current NPPF but also the 2012 NPPF as well. The March 2019 document Green Belt TP1 Addendum forms part of the current consultation and seeks to address the Local Plan Inspectors' comments of 24 July 2018 that:

... it is not clear to us how the Council has approached the task of delineating the Green Belt boundaries shown on the Policies Map submitted. Unless we have missed something, no substantive evidence has been provided setting out the methodology used and the decisions made through the process. We ask that the Council now provides this.

- 3.5 As noted within the CSAE report enclosed at Appendix 3, the approach taken by the council and the associated methodology in preparing the TP1 Addendum do not constitute a comprehensive green belt review to, amongst other things, consider appropriate Green Belt boundaries. The CSAE report states:

...rather its purpose is to provide further justification for the existing spatial strategy / Green Belt approach.

- 3.6 In other words, the TP1 Addendum is a further attempt to retrofit an evidence base to justify green belt boundaries and the detailed extent of the York Green Belt already proposed to be designated as such since 2005.

EX/CYC/18d: TP1 Addendum Annex 3 – York Green Belt Inner Boundary Section Descriptions and Justification

3.7 The TP1 Addendum Annex 3 (EiP Document Ref. EX/CYC/18d) seeks to assess and justify the proposed inner edge of the green belt. The assessment breaks down the main built part of the city into 7 radial “inner boundary sections” within the York Outer Ring Road (YORR). As with the main TP1 document, Annex 3 seeks to retrofit an evidence base to draft Green Belt boundaries selected as early as 2005. Paragraph 5.16 of the TP1 Addendum confirms the scope of the inner boundary assessment as follows:

The key role of the inner Green Belt boundary is to establish long term development limits to the built up area, and distinguish land that needs to be kept permanently open to meet the purposes of Green Belt including safeguarding the special character and setting of the historic city.

3.8 The CSAE report at Appendix 3 of these representations reviews the approach and methodology against that scope, the associated NPPF advice and with reference to Section 2, Sub-Sections 4-10. We do not repeat the CSAE analysis but note the following key points arising.

3.9 Annex 3, Section 2, Boundaries 4 – 8 assess the proposed inner green belt edge to the immediate east of SHLAA Site 8171. However, this assessment fails to objectively consider other potential boundaries. As such, the assessment is subjective rather than objective. Of particular relevance to these representations is the CSAE report comment that the A1237 and the built development of large scale housing at Acomb have “severed any connection between this land parcel and the historic centre of York. (i.e. referring to the land between the YORR and current urban edge, including SHLAA Site 871). As such, “there are no Key Historic Core Views”).

3.10 CSAE refutes the CYC attempted justifications for the green belt boundary at this point. As per previous representations in respect of Site 871 the CSAE Addendum report maintains:

The adjacent land parcel does have an open character, however the existing edge is poorly assimilated and the A1237 would provide a much more robust alternative boundary. Planned expansion could maintain a buffer to the ring road and provide a much better edge to York.

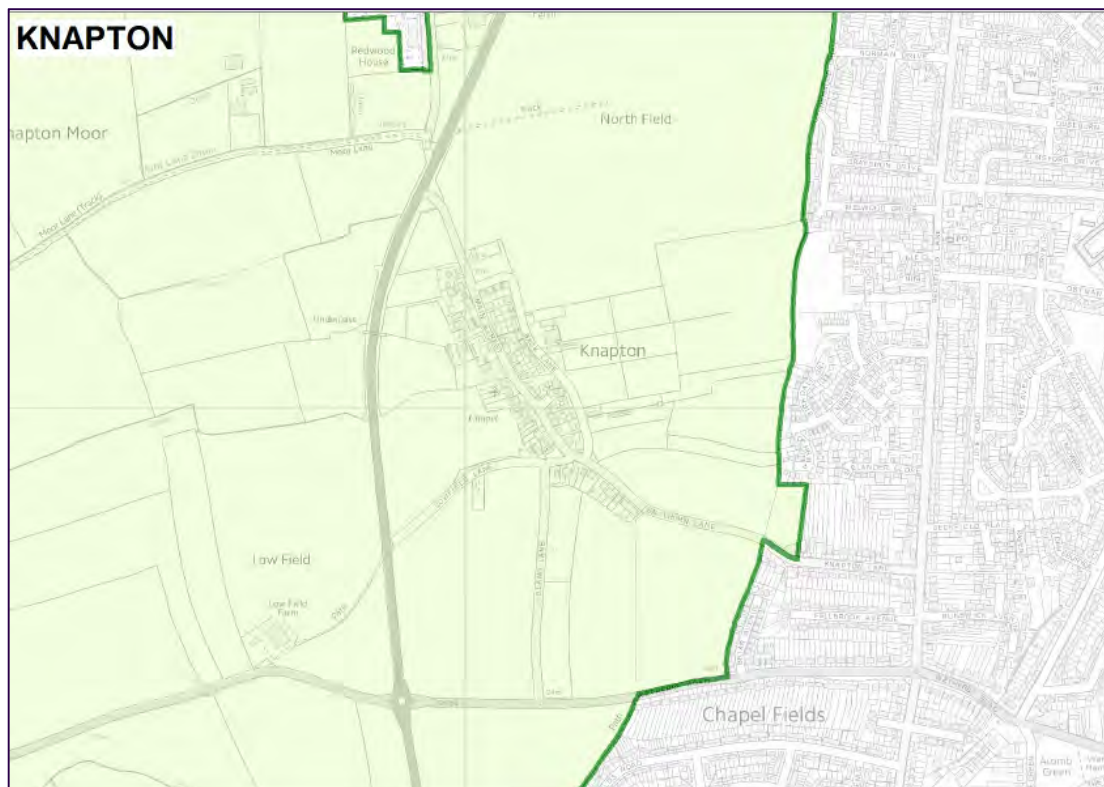
3.11 In respect of permanence, the CSAE report goes on to say:

The assessment notes that the proposed boundary follows an historic field boundary which forms a distinct edge between the urban area and more open farmland. In fact, this boundary largely follows the rear gardens of housing at the edge of York. This does not meet the criteria of a robust manmade or natural feature. The A1237 would provide a much more logical and permanent edge to the Green Belt at this point, however this does not appear to have been considered.

- 3.12 We consider the 2018 SHLAA conclusion in respect of Site 871 that *“the site should not be included as an allocation in the emerging Local Plan”* is a missed opportunity that should have been reconsidered under the PMs. Taking into account the need to identify more housing land, potential sustainable urban extensions such as the site should be strongly considered to help meet housing delivery requirements.
- 3.13 In proposing to designate the North Field site as part of the Green Belt, the council is in conflict with paragraph 139 of the NPPF as is missing the opportunity to allocate a suitable and sustainable site to help meet the requirement for allocation of sufficient land for housing.
- 3.14 If the North Field site is ultimately identified as an appropriate and sustainable urban extension the A1237 YORR boundary of the site would give a clearly defined and strong boundary to the Green Belt at this point, marking the urban edge of this part of York but enabling the land to be allocated to meet a significantly uplifted OAHN. An A1237 boundary would perform well under NPPF paragraph 139(f) in respect of a physical feature that is recognisable and permanent. Furthermore, this would be a simple and straightforward continuation of the proposed green belt boundary to the north, between the Boroughbridge Road Roundabout and where the A1237 crosses the River Ouse.

PM41 - Knapton

- 3.15 Proposed modification 41 seeks to amend the 2018 Proposals Map and to revise the extent of greenbelt, as shown on the following extract i.e. for the green belt to ‘wash over’ Knapton, a change from previous plan iterations whereby Knapton was inset, with a settlement boundary.



3.16 To facilitate housing delivery, we consider that an alternative green belt boundary to Annex 3 Section 2 would help meet development needs during the plan period, based upon an uplifted OAN and the selection of appropriate and sustainable housing land options. Pursuant to paragraphs 3.12 – 3.15 above, the suggested alternative Green Belt boundary is shown in green below, based upon an extract from the Vision Framework submitted as part of previous representations. This would also accommodate a green belt buffer to Knapton village.



PM29-PM40 – Proposed Green Belt Boundary Modifications

- 3.17 A significant part of the PMS consultation relates to additional evidence in the form of the Addendum to Topic Paper 1 - Approach to Defining York's Green Belt - March 2019 plus appendices. Whilst we do not have any specific comments in respect of PM29 – PM40 in themselves, we object to all of these PMs as a result of the green belt supporting evidence base as it stands.
- 3.18 L&QE objects to the modifications at PM29 – PM40 on the grounds that they represent cosmetic alterations that fail to take the opportunity to redraw the proposed Green Belt boundaries to help meet development needs during the plan period and “longer term development needs stretching well beyond the plan period”.
- 3.19 A site visit will confirm our view that the A1237 Outer Ring Road would form a more appropriate green belt boundary at this point in terms of the National Planning Policy Framework and associated policies, taking into account the need to allocate additional housing land in appropriate and sustainable locations.

EX/CYC/18b: TP1 Addendum Annex 5 – Development Sites in the Green Belt

- 3.20 Whilst the PMs the subject of this consultation do not include any amendment to the policies and evidence base behind strategic sites, within the General Extent of Green Belt, previous representations for L&Q/Gallagher have raised issues in respect of the selection and justification for the following strategic sites:
- ST7 – East of Metcalfe Lane;
 - ST8 – Land North of Monks Cross;
 - ST9 – Land North of Haxby;
 - ST14 – Land North of Clifton Moor; and
 - ST15 – Land to the West of Elvington Road.
- 3.21 As set out at pages 11 – 13 of the CSAE Addendum report (Appendix 3), the assessment of these sites under TP1 Addendum Annex 5 – Development Sites in the Green Belt raises a number of concerns.
- 3.22 In respect of consistency, Annex 5 highlights the point at paragraphs 3.4 – 3.6 above that the TP1 Addendum seeks to retrofit an evidence base to a set of draft green belt boundaries already selected under previous local plan iterations.
- 3.23 Further inconsistencies arise from the assessments for ST7 and ST9 which have passed the necessary site selection criteria, **despite the site assessments acknowledging harm to the special character and setting of York.**
- 3.24 The CSAE Addendum Report also highlights issues of urban sprawl and countryside encroachment for ST8, ST9 and ST14.

3.25 ST14 – Land North of Clifton Moor is of particular concern as it represents major development outside the YORR. It would also result in additional impact as a result of the extensive infrastructure needed. Problems of “cumulative urbanisation”, major encroachment into the open countryside and loss of separation between Clifton Moor and Skelton would occur. As a result, the Annex 5 conclusion that ST14 would cause only minor harm to green belt purposes 1, 3 and 4 and no significant harm to purpose 2 is patently absurd.

Green Belt Assessment – Summary

3.26 As a result of the historic restraining effect of the General Extent of Green Belt on new housing development and as well documented, there is significant pent-up housing demand and affordable housing need across the city. Land for housing within the built-part of York is at a premium and the Publication Draft Plan already takes into account key strategic regeneration sites and their capacity to deliver new housing. Previously developed land is a finite resource and historic rates of new housing on brownfield sites are most unlikely to be maintained for the plan period.

3.27 Despite this, the proposed green belt boundaries within the plan have clearly been drawn up with maximum development restraint in mind. Given the proposed boundaries are in no small part based upon a highly flawed approach under Policy SS1, it stands to reason that Policy SS2 as written cannot be considered sound as it is not effective and justified. As highlighted above we recommend that the Plan includes a minimum housing requirement of at least 1,069 dwellings per annum in order to meet the OAN for the City. Taking into account this and unrealistic assumptions on delivery, further land for housing will need to be identified and this will of necessity be within the General Extent of Green Belt given the proposed detailed boundaries are tightly drawn around the urban extent of the City. The Proposed Modifications do nothing to help resolve this problem.

3.28 Furthermore, given the absence of any full review of the General Extent of Green Belt since its introduction and in view of NPPF advice at paragraph 85, it is also considered necessary to formally identify Safeguarded Land to meet longer-term development needs stretching well beyond the plan period, and to ensure that the adopted Green Belt boundaries will not need to be altered at the end of the development plan period. Whilst we recognise that the Publication Draft Plan seeks to provide “further development land to 2038” (paragraph 3.13) this falls well short of the NPPF paragraph 85 requirement to:

*...meet longer-term development needs **stretching well beyond the plan period.** (CJ emphasis)*

3.29 In summary, more land should be released from the General Extent of Green Belt and from within the inner green belt boundary. Appropriate land should be allocated for housing as sustainable urban extensions to meet a significantly increased OAN and safeguarded land should also be allocated for development needs well beyond 2038. We therefore remain of the view that to render Policy SS2 sound it should be modified as follows:

*To ensure that there is a degree of permanence beyond the plan period sufficient land is allocated for development to meet the needs identified in the plan and for a further minimum period of five years to 2038, **with additional land released from the General Extent of Green Belt to be safeguarded for development beyond the plan period.** (CJ amendments in bold).*

- 3.30 The Proposed Modifications fail to address the fundamental issues of soundness arising from the interlinked OAN, strategic housing growth and green belt review matters set out within these representations.

4.0 CONCLUSION

4.1 These and our preceding representations refer to fundamental flaws in the Publication Draft Plan and explain why it is unsound. These representations explain why the Proposed Modifications and supporting evidence continue to fail to make the local plan sound. In particular, the plan fails to meet the necessary test of soundness and the NPPF paragraph 157 requirement to:

...plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework...

4.2 The most significant and on-going concerns are: -

- the proposed even lower annual housing provision with an OAN of 790;
- tightly drawn Green Belt boundaries;
- lack of any robust green belt review or justification; and
- insufficiency of housing land allocation

4.3 These would combine to hold back growth to unreasonably low levels, fail to facilitate delivery of much needed housing and further exacerbate the existing significant affordability issues.

4.4 To summarise in more detail, the Proposed Modifications will achieve nothing towards resolving/recognising the following issues that go directly to the heart of plan soundness:

- The plan should provide for a minimum of 1,069 new dwellings per annum.
- Even founded on a proposed housing figure of 790dpa the plan proposes insufficient housing land in appropriate and sustainable locations.
- The spatial strategy remains too heavily reliant upon (1) a number of large key and/or complex sites and over-optimistic and (2) unsupported assumptions over both timing and number of dwellings to be delivered. The PMs fail to resolve these concerns.
- The Proposed Modifications fail to include the reconsideration of sustainable urban extensions to make up the projected shortfall in supply and improve future range and choice.
- The draft plan remains unsound and in conflict with the NPPF as:
 - the PMs do not include measures to address the above issues; and
 - the green belt review update fails to accommodate safeguarded land to help meet “longer term needs stretching well beyond the plan period”.
- The proposed Green Belt remains unsound as it would unreasonably restrict development opportunities for the necessary growth of York.
- The proposed modifications under PM41 do not acknowledge that the A1237 to the west of Acomb would form a logical, permanent and strong Green Belt boundary and a well-defined edge to the built-part of the city at this point

- 4.5 L&QE respectfully maintains that Land at North Field, York, SHLAA ref. 871 should be released from the General Extent of Green Belt to be (at very least) designated as safeguarded land. However, in the first instance we consider the land should be allocated for housing within the plan period for the extensive reasons noted within these and previous representations. In particular this would help supplement draft housing allocations to meet an objectively assessed need for housing that will increase significantly during the progress toward local plan adoption.

**CITY OF YORK LOCAL PLAN
PUBLICATION DRAFT (FEB 2018)
REGULATION 19 CONSULTATION**

REPRESENTATIONS

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Appendices

Appendix 1: Further Review of the Objectively Assessed Need for Housing in York - March 2018

Appendix 2: Representations to the City of York Local Plan Pre-publication Draft (Regulation 18 consultation) – October 2017

1.0 INTRODUCTION & EXECUTIVE SUMMARY

- 1.1 Carter Jonas LLP welcomes the opportunity to make representations upon the February 2018 City of York Local Plan Publication Draft (the PDP) on behalf of Gallagher Estates Ltd. (Gallagher). These representations are pursuant to and cross-reference with previous representations by Turley at Preferred Sites and Pre-Publication Draft (Regulation 18) stages (the latter enclosed at Appendix 2).
- 1.2 Gallagher has a controlling interest in the land at North Field, York, which we again propose for allocation for housing. The land is Site Reference 871 within the Strategic Housing Land Availability Assessment (SHLAA) (2017). Our client is keen to work with the City of York Council to help ensure a sound Local Plan can be adopted as soon as possible. We will be pleased to engage with the Council upon matters of housing need and delivery, and site-specific matters to facilitate swift progress.
- 1.3 We note that the Minister for Housing, Communities and Local Government (HCLG) has confirmed (as of 23 March 2018) the council is not one of those selected for intervention. However, a watching brief will be maintained by HCLG to ensure the Council continues to meet the published timetable set out within the Local Development Scheme. Notwithstanding this, we have major concerns over the soundness of the plan as currently proposed which will impact upon the timetable for Plan and prolong the continued failure to plan to meet the needs of the City of York.
- 1.4 In summary our main representations are as follows:

Vision, Spatial Strategy and the Housing Requirement

- The Vision and Outcomes are not justified or effective as they are not backed by sufficient evidence and positive policies to meet the identified housing need.
- The housing requirement and the predicted housing supply is not justified, effective or consistent with national planning policy or even the council's own evidence base.
- In particular, the minimum annual provision of 867 new dwellings per annum is not based upon any robust objective assessment of need – even the council's own evidence base gives an OAN of 953dpa.
- As a result, the draft plan will not deliver sufficient new housing or the much needed boost to the level of supply indicated by the available evidence.
- Based on the available evidence, the plan should provide for a minimum of 1,070 new dwellings per annum.
- Even founded on a figure of 867dpa the plan proposes insufficient housing land to meet its proposed requirement.
 - The spatial strategy relies too heavily on a number of key large and/or complex sites and over-optimistic and unsupported assumptions over both timing and number of dwellings to be delivered.

- The draft plan also includes over-optimistic assumptions over the predicted level of windfall.
- Indicative densities are too high, giving unrealistic yield per hectare assumptions and potentially resulting in poor quality development and lack of new housing choice.

The Green Belt

- The concept of sustainable urban extensions should be re-introduced to make up the projected shortfall in supply and improve future range and choice.
- The draft plan is unsound and in conflict with the NPPF as no safeguarded land is proposed to help meet “longer term needs stretching well beyond the plan period”.
- The proposed Green Belt is unsound as it is drawn to unreasonably restrict development opportunities for the necessary growth of York.

Site selection and the case for land at North Field, York

- As noted below, the emerging spatial strategy changed when options including 42% of new housing delivery through extensions to the main urban area were dismissed to be replaced by additional land beyond the Ring Road and within three freestanding settlements described as garden villages.
- Whilst the Sustainability Appraisal considers the strategic sites against each other it fails to reassess them against legitimate alternatives such as the proposed urban extensions.
- In effect, the Sustainability Appraisal fails to provide a comparative assessment of urban extension Site 871: Land at North Field, York as a reasonable alternative against the selected sites.
- The A1237 to the west of Acomb would form a logical, permanent and strong Green Belt boundary and a well-defined edge to the built-part of the city at this point.
- Our client’s land at North Field, York is fully deliverable and represents one of the most appropriate sites for allocation when considered against reasonable alternatives and our client and the relevant landowners are willing parties.
- We demonstrate that:
 - The site occupies a highly sustainable location within close proximity to the existing facilities and services of Acomb District Centre;
 - It is well connected via existing sustainable transport network, including bus stops on Beckfield Lane providing access to the City Centre, a train station at Poppleton and a recently completed park and ride facility on the A59;
 - The development of the site as proposed provides opportunities to improve local community facilities, including the provision of new public open space and a

primary school and will deliver significant economic, social and environmental benefits;

- The development will deliver new and much needed affordable housing;
 - The development can sensitively address the relationship between the urban edge of York and the settlement of Knapton through the inclusion of a green gap between the site and Knapton. The development will not result in significant harm to the Green Belt and its key purposes.
 - The development offers the potential to facilitate the delivery of the York Outer Ring Road project through dedicating land along the site's frontage to enabling the dualling of the A1237 to be achieved, thereby avoiding the need for the Council to acquire land and be exposed to the costs, delays and risks associated with this.
- In summary, the North Field, York site should be released from the Green Belt and allocated for housing.

1.5 We have provided a structured response which addresses the policies within the PDP, as follows:

- Section 2 sets out our response to the document as a whole and general approach of the Pre-Publication Draft Local Plan;
- Section 3 covers spatial strategy and the overall housing requirement
- Section 4 relates to housing
- Section 5 sets out and summarises the case for the allocation of land at North Field, York.
- Section 6 summarises our conclusions

1.6 We have completed a representation form to which this statement is attached and includes the request to participate in the examination.

2.0 THE OVERALL DOCUMENT & GENERAL POLICIES

Background

- 2.1 Within this response, our comments are directed at specific parts of the Publication Draft Plan, which we consider make the document 'unsound'. Our response addresses the issues of soundness set out in paragraph 182 of the National Planning Policy Framework (NPPF) (2012). These require that the Plan should be: -
- Positively Prepared;
 - Justified;
 - Effective and
 - Consistent with national planning policy.
- 2.2 We have some initial comments in regards the document as a whole. Principally the concerns are as follows: -
- Following a long and troubled preparation over many years and as a result of recent Council decisions on growth the Publication Draft Plan is not sufficiently strategic in focus and fails to provide a clear strategic direction for the City;
 - In view of the proposed unreasonably low level of housing growth set at 867 dpa the plan fails to respond to the direction of travel contained within CLG's White Paper 'Fixing our Broken Housing Market' (Feb 2017), 'Planning for the Right Homes in the Right Places: Consultation Paper' (September 2017) and the recent draft National Planning Policy Framework and Planning Policy Guidance issued in March 2018 and associated documents.
 - In effect, as a result of the housing land shortfall the plan will fail to significantly boost housing land supply, address affordability or 'fix the broken housing market' across the city.
- 2.3 It is considered that a significant amount of work still needs to be done to make the Local Plan sound. As it stands, the document is:
- Not justified because is not based on an robust and credible evidence base, and is not the most appropriate strategy when considered against reasonable alternatives;
 - Not effective due to issues of flexibility and does not plan properly to meet the identified needs; and
 - Not consistent with current and emerging national planning policy.
- 2.4 Our specific comments are set out below on a section-by-section basis.

Section 2: Vision and Development Principles

- 2.5 The Vision and Outcomes at p16 are fairly generic and fail to say anything about the need for housing growth to help both deliver and underpin the sustainable development aims and objectives.
- 2.6 Paragraphs 2.1 and 2.2 promote the key role of York in leading Sub-Regional economic growth and new job creation whilst as safeguarding existing employment provision. The aim is to deliver 650 new jobs per annum. Paragraph 2.5 acknowledges the need to provide new homes in the form of “sufficient land for 867 dwellings per annum. Specific reference is made to ‘garden village’ developments at three locations plus “major sustainable urban extensions such as British Sugar and York Central.”
- 2.7 Policies DP1 and DP2 of the Publication Draft Plan acknowledge the need for development to meet housing needs. DP1 aims to ensure:
- The housing needs of the City of York’s current and future population including that arising from economic and institutional growth is met within the York local authority area.*
- 2.8 We wholeheartedly welcome this aim, although for the Vision to be ‘sound’ it should also explicitly acknowledge the need to provide affordable housing and diversify the housing market.
- 2.9 We have significant concerns that the Plan will not effectively meet the development principles of Policy DP1 aims, as set out above. It is well documented that the housing target set out within the publication Plan is not appropriately justified and should be increased to seek to meet the housing needs and economic growth in the area

3.0 SPATIAL STRATEGY AND THE HOUSING REQUIREMENT

Policy SS1: Delivering Sustainable Growth for York

- 3.1 Policy SS1 is not considered to be sound as it is not positively prepared, effective or consistent with national policy for the following reasons.
- 3.2 In light of the 2018 Turley OAN report (Appendix 1) and wider evidence base, our client objects to the housing requirement being set at 867 dwellings per annum and concludes that the OAN should be closer to 1,000 dwellings per annum.
- 3.3 The Council's own evidence base, in the form of the GL Hearn Strategic Housing Market Assessment (May 2017 - the SHMA) clearly recommends that, based on their assessment of market signals evidence and some recent Inspectors decisions, the council should include a 10% market signals adjustment to the 867 figure, resulting in a requirement of 953 dwellings per annum.
- 3.4 The Plan ignores the supporting evidence base conclusions and provides no clear or sound justification for not making an adjustment for market signals in light of Government guidance. The Publication Draft Plan text at paragraph 3.3: Housing Growth is silent on the methodology behind the selection of the 867dpa figure. There are significant issues of housing affordability within the city which needs to be addressed and there is no evidence of any recent improvement in this respect. This is in breach of the NPPF core planning principle at paragraph 17, bullet point 4. The decision makers at City of York Council Local Plan Working Group and Executive meetings in January 2018 had every opportunity to aim for a more reasonable, justified and positive target for housing delivery. This would have been fully supported and justified by the SHMA evidence base, officer recommendations (including suggested additional housing sites) and statements of case by many representors. However, the members of those committees failed to take this opportunity, choosing a figure based on only part of the GL Hearn findings. This approach is wholly unjustified and in breach of the aims and objectives of draft Policy DP1 as noted above.
- 3.5 As such, the housing requirement of 867 per annum fails to comply with Planning Practice Guidance and as a result the Publication Draft Plan fundamentally fails to provide for the evidenced housing growth requirement and is therefore patently unsound.
- 3.6 Furthermore, an additional economic uplift based upon representations from businesses and bodies such as the York Chamber of Commerce and ambitions of the Local Enterprise Partnership should reflect the confirmed role of York as a "key economic driver". As paragraph 4.5 of the 2018 Turley OAN Report at Appendix 1 notes, the 10% uplift would be the absolute minimum level of adjustment necessary. The report suggests a figure of circa 1,000dpa. The lack of reasonable explanation for not including an economic uplift is contrary to PPG advice at Paragraph: 004 Reference ID: 2a-004-20140306, as follows:

...the use of this standard methodology set out in this guidance is strongly recommended because it will ensure that the assessment findings are transparently prepared. Local planning authorities may consider departing from the methodology, but they should explain why their particular local circumstances have led them to adopt a different approach where this is the case.

- 3.7 Given the real prospects of the plan being found unsound at the earliest juncture, the council should allow for a significant increase from the 867 figure towards the 1,070dpa confirmed within the Planning for the Right Homes Publication Data spreadsheet. As a result, we consider the OAN figure for York is closer to 1,000 dwellings per annum to meet demographic needs and provide a reasonably necessary response to market signals, which should be planned for in the dual interests of flexibility of supply and positive planning. This follows directly from the conclusions at paragraphs 4.3 – 4.9 of the 2018 Turley OAN Report, as follows:

4.3 At a fundamental level, Gallagher Estates continues to be concerned with the Council's disregarding of the evidence set out in the SHMA Update, and its decision to "agree" only with the scale of housing need suggested by the 2014-based household projections. The unjustified dismissal of the market signals adjustment subsequently applied by its consultant's results in a figure derived only from a partial application of the PPG methodology, with this approach not objective or sound. The continued omission of any reference to the concluded OAN for 953 dwellings per annum is strongly challenged by Gallagher Estates.

4.4 A review of submissions to the previous stage of consultation confirms that similar concerns around the interpretation of the OAN evidence were expressed by a number of representors, with concerns around its calculation also noted. The Publication Draft Plan fails to respond to these concerns.

4.5 Our previous technical review identified the following principal points of concern with regards to the Council's OAN evidence and its interpretation into policy:

- **The selection of a demographic projection which failed to allow for an improvement in younger household formation**, despite the SHMA Update confirming that 873 dwellings per annum would be needed to facilitate such an improvement;*
- **The omission of any adjustment to respond to the evidenced worsening in market signals**. The 10% uplift recommended in the SHMA update – but disregarded by the Council – has been commonly viewed as the absolute minimum level of adjustment necessary and justified in York, with at least one representor arguing that a higher uplift of 20% is required; and*

- **The absence of clear justification for the Council's comparatively low employment growth target**, which contrasts with its apparently more ambitious economic strategy. The omission of technical detail and transparency on the modelling assumptions made in testing the alignment between housing need and job growth also restricts proper consideration of the extent to which labour availability may constrain the realisation of economic objectives over the plan period.

4.6 The above points of critique led Turley to previously conclude that closer to 1,000 dwellings per annum are likely to be needed in York to meet demographic needs and provide the absolute minimum response of 10% reasonable and necessary to respond to market signals. This conclusion remains valid, and indeed is reinforced by evidence of a continued worsening in market signals which – if not addressed – will result in a further deterioration in the affordability of housing in the city. York already ranks amongst the least affordable authorities in the north, particularly at entry level.

4.7 A review of other representations has identified three alternative OAN assessments submitted during the previous stage of consultation which similarly concluded that in excess of 1,000 dwellings per annum are needed in York, broadly aligning with the indicative outcome of the proposed standard method for calculating housing needs (1,070dpa). This suggests an annual need for around a quarter (23%) more homes than the Council intends to provide through the Local Plan, as a minimum.

4.8 The proposed housing requirement is therefore derived from evidence which fails to comply with the PPG, against which its soundness will be tested before the introduction of the new standard method. This failure to ensure consistency with national policy – coupled with the lack of justification for an approach which will not be effective in meeting York's housing needs through a positively prepared Local Plan – means that the Publication Draft Plan fails the tests of soundness defined through the NPPF.

4.9 In the context of an acknowledged failure to plan for the full need for housing, it is apparent that other neighbouring authorities – with which the city has the strongest housing market relationships – do not have any stated intention to meet the unmet needs of York. Contrary to national policy, this will leave a significant level of housing needs unmet, detrimentally impacting upon households and the ongoing sustainability of the city as well as failing to contribute to addressing an acknowledged national housing crisis. 3.6 The Publication Draft Plan housing requirement of 867 dwellings per annum wholly fails to meet the requirements of the PPG and NPPF and in light of paragraph 182 of the NPPF it is not positively prepared, justified, effective and consistent with national planning policy.

Policy SS2: The Role of York's Green Belt

3.8 The General Extent of Green Belt for York was established by The Regional Strategy for Yorkshire and Humber (Partial Revocation) Order 2013. We welcome the opportunity for the establishment of detailed Green Belt boundaries for the first time and consider that this issue goes to the heart of a sound plan for the city. Under 'saved' Policy YH9 of the Yorkshire and Humber Plan the council must "*establish long term development limits that safeguard the special character and setting of the historic city*". However, in establishing the inner and outer Green Belt boundaries, the council must also bear in mind the need to:

- allocate sufficient land to be allocated for development; and
- identify areas of 'safeguarded land' for potential development beyond 2033.

3.9 As a result of the historic restraining effect of the General Extent of Green Belt on new housing development and as well documented, there is significant pent-up housing demand and affordable housing need across the city. Land for housing within the built-part of York is at a premium and the Publication Draft Plan already takes into account key strategic regeneration sites and their capacity to deliver new housing. Previously developed land is a finite resource and historic rates of new housing on brownfield sites are most unlikely to be maintained for the plan period.

3.10 Despite this, the proposed Green Belt boundaries within the plan have clearly been drawn up with maximum development restraint in mind. Given the proposed Green Belt boundaries are in no small part based upon a highly flawed approach under SS1 (as noted above), it stands to reason that Policy SS2 as written cannot be considered sound as it is not effective and justified. As highlighted above we recommend that the Plan includes a minimum housing requirement of at least 1,000 dwellings per annum in order to meet the OAN for the City. Taking into account this and unrealistic assumptions on delivery, further land for housing will need to be identified and this will of necessity be within the General Extent of Green Belt given the Green Belt boundaries are tightly drawn around the urban extent of the City.

3.11 In respect of the overall housing requirement and the need for the release of land from the General Extent of Green Belt to meet the OAN we cross-refer to the October 2017 representations on behalf of Gallagher Estates, appended herewith at Annex 2 for ease of reference. Paragraph 4.21 of those representations by Turley includes Tables 4.1 and 4.2, covering the land to be released from the General Extent of Green Belt for both 867 and 1,070dpa scenarios.

3.12 Paragraph 4.22 summarises the findings as follows:

The above calculations demonstrate a need to release land capable of delivering at least 9,653 residential units from the Green Belt to meet needs over the plan period and beyond based on a requirement for 867 residential units per annum, or 17,275 units based on a

requirement for 1,070 units per annum. This compares to the Local Plan proposal to release 347 ha of land from the Green Belt to deliver 6,590 units, representing a shortfall of between 4,051 and 10,685 units and approximately 202 to 534 ha.

- 3.13 Furthermore, given the absence of any full review of the General Extent of Green Belt since its introduction and in view of NPPF advice at paragraph 85, it is also considered necessary to formally identify Safeguarded Land to meet longer-term development needs stretching well beyond the plan period, and to ensure the Council is satisfied that the adopted Green Belt boundaries will not need to be altered at the end of the development plan period. Whilst we recognise that the Publication Draft Plan seeks to provide “further development land to 2038” (paragraph 3.13) this falls well short of the NPPF paragraph 85 requirement to:

*...meet longer-term development needs **stretching well beyond the plan period.** (CJ emphasis)*

- 3.14 In summary, more land should be released from the General Extent of Green Belt to be allocated for housing to meet a significantly increased OAN and safeguarded land should also be allocated for development needs well beyond 2038. We therefore suggest that to render Policy SS2 sound it should be modified as follows:

*To ensure that there is a degree of permanence beyond the plan period sufficient land is allocated for development to meet the needs identified in the plan and for a further minimum period of five years to 2038, **with additional land released from the General Extent of Green Belt to be safeguarded for development beyond the plan period.** (CJ amendments in bold).*

Spatial Strategy: Key Housing Sites - Policies SS4 – SS20

- 3.15 Whilst we do not go into detail on each of the key sites set out between pages 32-69 of the Publication Draft Plan we have deep-seated concerns in respect of (1) the over-reliance on large, strategic sites (including new settlements) and (2) the unrealistic yields being suggested.

Policy SS4: York Central

- 3.16 Whilst at this stage we do not go into the details and evidence base behind Policy SS4 we note that the suggested yield includes a significant degree of optimism in terms of programme and delivery rates on the one hand and an unreasonably broad range of potential housing yield stated within Table 1 of the reports to the Local Plan Working Group and Executive (both January 2018), ranging from 1,700 – 2,500 dwellings. In particular, the suggested “1,700 – 2,500 dwellings, of which a minimum of 1,500 dwellings will be delivered in

the plan period” is too broad a range, demonstrating a lack of clear understanding of true site potential and likely yield during the plan period.

- 3.17 It is worth noting that the suggested range of 1,700 – 2,500 dwellings doesn't correlate with the council's own York Central webpage which states:

The current proposals are subject to further technical work and consultation, but current suggestions include 1,000 to 2,500 homes...

Policy SS6: British Sugar/Manor School

- 3.18 As with SS4 above we do not go into the details behind Policy SS6 at this stage. However, consider the suggested 1,200 dwelling yield includes a significant degree of over-optimism. This is highlighted through the October 2017 Planning Committee report for the undetermined planning application ref. 15/00524/OUTM which refers to “up to 1,100 dwellings” and then with the subsequent January 2018 Design and Access Statement setting out a range of scenarios resulting in as few as 675 units (Option A, at 35dph), up to a maximum of 1,076 units (Option C, at 45dph).

Policy SS19 and 20: Queen Elizabeth Barracks and Imphal Barracks

- 3.19 Given the stated intentions of Defence Infrastructure Organisation (DIO) there would appear to be a significant prospect of the land becoming available. However, these DIO sites remain operational until Queen Elizabeth Barracks (QEB) and Imphal Barracks (IB) are vacated by existing users. As stated in previous representations (see Appendix 2), concerns are raised in relation to the reliance on such sites to deliver the plan's housing requirements as this strategy represents a significant risk insofar as there is also a prospect of current operators deciding to retain control. This is especially a risk in the case of IB, which is not expected to be disposed of until 2031 at the earliest.

Site Selection and the Spatial Distribution of Housing Sites

- 3.20 Policy SS3 of the 2013 Draft Local Plan proposed to “Make provision for 42% of need within urban extensions to the main built up area”. Section 3 of the Publication Draft Plan fails to re-establish the principle of urban extensions, with the allocation of strategic sites beyond the built part of York and inset within the Green Belt being proposed instead. These include Site ST14: Land to the West of Wigginton Road and ST15: Land to the West of Elvington Lane. Whilst the Sustainability Appraisal considers the selected sites against each other it fails to reassess them against alternatives such as the dismissed urban extensions. We maintain this renders the plan unsound and that urban extensions in sustainable locations, such as the Land at North Field, should be reintroduced to help make up the expected delivery shortfalls against OAN noted throughout these representations and to increase flexibility and broaden choice.

3.21 Paragraphs 5.11 – 5.46 of the appended October 2017 representations for Gallagher by Turley set out further detailed concerns over the approach taken in respect of spatial distribution of development and housing site selection which we carry forward as part of these submissions. Gallagher confirms that the previous representations covering site selection and the spatial distribution of housing sites still stand and should be taken into account as the plan progresses to submission and examination. Those concerns are summarised as follows:

- Inconsistency with previous preferred spatial distribution approach toward prioritising development within and extensions to the main urban area
- The uncertainty over transportation and community infrastructure for standalone new settlements.
- The reliance on large, strategic sites including new free-standing settlements has not been properly tested through an updated Sustainability Appraisal.
- The smaller new settlements (Allocations ST7 and ST14) “*will deliver just 845 and 1,348 units in total respectively*”, falling short of the critical mass required to fund the provision of the necessary community and sustainable transport infrastructure needed.
- The Green Belt appraisal in support of the proposed allocations is not compliant with the NPPF.
- The discounting of sites on Green Belt grounds in the absence of consideration of wider sustainability benefits and alternatives is wholly unsound.
- The selection of sites in the absence of a robust and up-to-date Green Belt assessment is similarly unsound.
- These matters combine to render the plan fundamentally unsound.

3.22 In conclusion, due to the need to allocate additional land for housing as set out throughout these latest representations, Gallagher maintains that urban extension sites represent a more sustainable alternative compared to any additional new settlement options. This approach has not been sufficiently re-tested through the Sustainability Appraisal 2018 as an appropriate alternative.

3.23 In addition, we note that an updated and amended Sustainability Appraisal (SA) has been published, as of February 2018. The comments made in the Turley October 2017 representations in respect of the wider sustainability appraisal process still remain. However, we specifically note that neither the updated SA Appendix H Appraisal of Allocations and Alternatives nor Appendix I: Appraisal of Strategic Sites and Alternatives include a comparative assessment of Site Ref. 871: Land at North Field, York. This represents a further reason to deem the Publication Draft Plan unsound.

4.0 HOUSING

Policy H1: Housing Allocations

- 4.1 This section of the plan seeks to set out *the “policies and allocations to positively meet the housing development needs of the city”*. We maintain for the reasons given above, the proposed housing allocations will not meet the appropriate level of OAN for the City over the plan period. In this respect the plan is not sound, justified, effective or in accordance with national policy.
- 4.2 It is vital the Council produces a plan which can deliver against its full housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period and that the plan allocates more sites than required to meet the housing requirement as a buffer. To meet NPPF requirements for the plan to be positively prepared and flexible the buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. Gallagher suggests a contingency of at least 10% to the overall housing land supply to provide sufficient flexibility for unforeseen circumstances and in acknowledgement that the housing requirement is proposed as a minimum not a maximum figure.
- 4.3 As far as we are aware, the Council has not provided a robust assessment of trajectory for the housing allocations and therefore it is difficult to provide a detailed analysis of the likely delivery rates of the individual sites. However on the limited information available it is considered that the Publication Draft Plan significantly underestimates the length of time it will take for the housing allocations to start delivering completions. A significant amount of supply is based upon the regeneration sites and large strategic allocations set out within Section 3: Spatial Strategy and therefore are likely to take a number of years to achieve detailed planning permission given the requirements for, *inter alia*, remediation, Environmental Impact Assessment and complexities of the likely Section 106 Agreements involving the delivery of new schools, local centres and significant pieces of infrastructure etc.
- 4.4 Furthermore, a number of the sites are under multiple ownerships and therefore may take many years for land assembly to take place and the drawing up contractual agreements with developers. These combined factors mean that a large number of the housing allocations are unlikely to start delivering completions within the first 5 years of the plan period.
- 4.5 Our client is concerned that the methodology used for determining the capacity of the proposed allocations has overestimated the amount of housing that will be delivered on the sites and as such the reliance on these sites could render the Plan ineffective due to more realistic lower yields. It is considered that the build out rates and density levels contained in the SHLAA are not realistic or robust. To illustrate this it is worth noting the very broad estimated 1-10 year phasing within Table 5.1 for key sites such as H1: Heworth Green Gas Works and H7: Bootham Crescent. In addition, the SHLAA overestimates gross to net site ratios, which is a particular problem for large sites which will require substantial on-site infrastructure and ancillary uses such as public open

space, schools, local services and facilities, flood attenuation ponds and swales, significant adoptable road networks etc. The assumptions used in the SHLAA do not appear to be supported by any local evidence.

- 4.6 As evidenced by the Windfall Technical Paper, the housing supply makes an allowance for windfall sites of 169 dwellings per annum from plan year 4. As noted above, previously developed land is a finite resource and, similarly, historic rates of windfall are most unlikely to be maintained for the plan period. Furthermore, we note the allocation of smaller sites (e.g. Site H53 Land at Knapton Village for 4 dwellings). In the past, these smaller sites for only a handful of units might otherwise have been considered as windfall should they come forward and as a result their allocation would detract from projected windfall based on historic rates. Gallagher therefore objects to the inclusion of over 2,000 units of windfall within supply as being wholly unsupported, unsound and lacking justification. It is understood that Government guidance enables allowances to be made for windfall contribution. However, we suggest that it would be more effective to regard any contribution from windfalls as a boost to supply due to their uncertainty in delivery and the shortfall made up of appropriately planned for, allocated sites.
- 4.7 The above will necessitate additional housing allocations being identified. Failure to identify additional housing will impact upon the overall delivery of the Local Plan aims and objectives to meeting housing need.

Policy H2: Density of Residential Development

- 4.8 We envisage that the high housing densities within Policy H2 represent part of the council's case to minimise housing land allocations and thus the need to remove land from the General Extent of Green Belt. Development densities of 100 dwellings per hectare within the city centre and 50 dwellings per hectare within the wider urban area are unrealistically high and would lead to lack of choice and poor standards. As currently drafted, Policy H2 is not considered to be sound as it is not effective, justified or consistent with national policy.
- 4.9 Whilst paragraph 47 of the NPPF indicates local authorities can set out their own approach to housing density this should be based upon local circumstances and not harm the overall objective of boosting significantly housing supply.
- 4.10 Gallagher considers that the appropriate evidence is not available to support this policy as written. The high-density development proposed in this policy may be difficult to market as it would be likely to result in poor internal standards of residential amenity, small garden areas, no garages and little parking. It is considered that lower density developments would be more marketable, and the policy should be amended to allow for this flexibility. We recommend the inclusion of an additional category of Sustainable Urban Extensions with densities set between 25-35dph.
- 4.11 As noted above, the proposed high densities and in particular the 50dph proposed within the York urban area would lead to smaller units and more cramped layouts being proposed. Unless the suggested densities are reduced, Policy H2 will also be in conflict with other Government initiatives such as the Nationally Described

Space Standard which seeks increased total floorspace and better standards of internal amenity per dwelling and against the interests of providing good quality new housing to meet the high levels of demand.

Policy H3: Balancing the Housing Market

- 4.12 Gallagher maintains that the housing market and the appropriate mix of housing will vary both with time and within different parts of the housing market. We maintain that greater flexibility should be built into Policy H3 as the optimum mix for any proposed housing development to reflect market demand and aspirations alongside need over the plan period.

Policy H4: Promoting Self and Custom House Building

- 4.13 In view of the lack of market evidence over the willingness of self-builders and/or small/custom house-builders to build within larger sites of 5ha plus, Gallagher objects to Policy H4 in principle and will maintain a watching brief in respect of Policy H4. We will review this stance in the event that such demand can be identified by the council.

Policy H5: Gypsies and Travellers

- 4.14 Gallagher is concerned that housing sites of 5ha or more will be expected to meet the need of *“those 44 Gypsies and Traveller households that do not meet the planning definition”* and we note the HBF has similar concerns. We agree with the HBF that *“further clarity is needed in relation to why provision is needed for those households no longer meeting the definition; whether a pitch on a strategic allocation is an appropriate location for these households particularly at the numbers proposed; what will happen to these pitches if no gypsy or traveller wishes to utilise them; and the management of these pitches.”* In the absence of such clarity Gallagher objects to Policy H5 as drafted.

Policy H9: Older Persons Specialist Housing

- 4.15 In respect of Policy H9 we maintain that strategic sites should only be required to *“incorporate the appropriate provision of accommodation types for older persons within their site masterplanning”* only if the need for older persons accommodation and the site suitability and location are appropriate. H9 should be amended to incorporate flexibility.

Policy H10: Affordable Housing

- 4.15 Gallagher generally supports the provision of affordable housing and maintains that urban extensions provide the opportunity to help meet affordable housing requirements across the city. We reserve our position on this aspect of the plan subject to more detail of how the draft NPPF amendments to the definition of affordable housing provision as set out in the current consultation on the draft NPPF will be incorporated as the plan proceeds.

5.0 THE CASE FOR THE ALLOCATION OF LAND AT NORTH FIELD, YORK

5.1 These representations are pursuant to the previous representations for Gallagher and seek to establish that the site is suitable for allocation and represents the most appropriate option for allocation when considered against reasonable alternatives. The representations in particular make cross-reference to the October 2017 Vision Framework by Turley, which was attached to their October 2017 representations. This framework provides details of the sites' deliverability, suitability for development and achievability in terms of its ability to be brought forward to meet the city's housing requirement and is summarised and quoted at paragraphs 5.3 – 5.7 below.

5.2 In all planning respects the proposal is sustainable and addresses all planning policy, environmental and technical considerations.

The Proposal - Summary

5.3 The site is approximately 84 hectares in size and could readily accommodate up to 1,000 dwellings (at a net density of 25-35dph) and a new primary school. There is sufficient land to enable the delivery of a high quality and sustainable development, relating well to the surrounding context. The proposals also include local highway network improvements to the benefit of all users and in particular helping to underpin and deliver the council's own planned widening Ring Road.

5.4 As confirmed within the Vision Document:

A thorough assessment of the site's context has been undertaken and it has been demonstrated that the site is both suitable and appropriate for the proposed development. It also represents a deliverable and viable opportunity to provide sustainable housing growth on the north-western edge of York and contribute towards meeting the housing targets within the local area.

5.5 The Vision Document justifies this by undertaking an in-depth assessment of relevant planning policy and site context, detailed site analysis covering all material considerations before developing a concept framework. In conclusion the Vision Document demonstrates the following:

- *Policy Context – The development proposes a sustainable form of development which will help make a significant contribution towards the Council's housing supply position and help deliver wider economic growth and social benefits;*
- *Townscape and Context – The site relates well to Acomb and forms a logical and well-contained extension to the suburban area of York. The A1237 will create a defensible boundary to the west of the site and the proposed retention of the agricultural land to the*

south will ensure that a sensitive buffer is retained between the development and Knapton village and ensure that the development will result in only minimal harm to the Green Belt;

- *Access – The site is in a sustainable location, close to local facilities and community services. It relates well to the surrounding area and is fully accessible by car, walking, cycling and public transport modes; and*
- *Benefits – The future development of the site can be delivered whilst retaining and enhancing its specific landscape and ecological attributes. The masterplan also demonstrates that additional areas of public open space and community facilities can be delivered through the release of the land for development.*

5.6 Section 6 of the October 2017 representations for Gallagher by Turley provides a detailed rebuttal of the 2017 SHLAA explanation for not allocating the site covering the following:

- landscape and historic setting
- heritage assessment
- Green Belt policy
- sustainability considerations

5.7 In the interests of completeness and for ease of reference their conclusions at paragraphs 6.37 and 6.38 remain of full relevance when responding to the Publication Draft Plan consultation and we repeat them in full below:

6.37 *It is Gallagher Estates view that the characterisation of the site as forming part of the historic character and setting to the City is flawed given the relationship which this land has with the historic core of York. Land can only perform this function where the historic core of York is visible from views across this land and where the historic core provides a backdrop to this land, as confirmed by the Council’s own definition provided in the 2003 Green Belt Assessment. Clearly that does not apply in the case of North Field. The evidential basis on which the site has been discounted without proper consideration as a viable and sustainable development opportunity is deficient. The Local Plan is not justified and is unsound as a result.*

6.38 *More generally, and as outlined in section 5, the Council’s approach to appraising sites which are deemed to have a specific Green Belt function in respect of NPPF Purpose 4 is at odds with paragraph 84 of NPPF. As a procedural point, there is no justified reason for discounting such sites on the basis of one aspect of their Green Belt contribution (as only one provision of national planning policy) without properly considering their sustainability credentials in a broader sense. This puts the Local Plan in conflict with the NPPF (paragraph 84) and renders it unsound as a result.*

Deliverability

5.7 Site Ref. 871: Land at North Field, York is fully 'deliverable' in accordance with Paragraph 47 of the NPPF as it is: -

- a) Available now;
- b) A suitable location for development now; and
- c) Is achievable with a realistic prospect that housing will be delivered on the site.

6.0 CONCLUSION

6.1 These representations set out fundamental flaws in the Publication Draft Plan and explain why it is unsound. In particular, the plan fails to meet the NPPF paragraph 157 requirement to

...plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework...

6.2 The most significant concerns are the proposed low annual housing provision, tightly drawn Green Belt boundaries and insufficiency of housing land allocation would combine to hold back growth to unreasonably low levels and exacerbate the existing significant affordability issues further.

6.3 To summarise in more detail:

- The Vision and Outcomes are not justified or effective as they are not backed by positive policies to meet housing need.
- The housing requirement and the predicted housing supply is not justified, effective or consistent with national planning policy or even the council's own evidence base.
- The draft plan will not deliver sufficient new housing or the much needed boost to the level of supply indicated by the available evidence.
- The plan should provide for a minimum of 1,000 new dwellings per annum.
- Even founded on a proposed housing figure of 867dpa the plan proposes insufficient housing land.
- The spatial strategy relies too heavily on a number of large key and/or complex sites and over-optimistic and unsupported assumptions over both timing and number of dwellings to be delivered.
- The draft plan also relies too heavily on over-optimistic assumptions over the predicted level of windfall.
- Indicative densities are too high, giving unrealistic yield per hectare assumptions and potentially resulting in poor quality development and lack of new housing choice.
- The spatial strategy changed when options including urban extensions were replaced by additional land beyond the Ring Road and within freestanding new settlements but, whilst the Sustainability Appraisal considers the proposed strategic sites against each other it fails to reassess them against legitimate alternatives such as the proposed urban extensions delivering 42% of supply.
- The concept of sustainable urban extensions should be re-introduced to make up the projected shortfall in supply and improve future range and choice.
- The draft plan is unsound and in conflict with the NPPF as no safeguarded land is proposed to help meet "longer term needs stretching well beyond the plan period".
- The proposed Green Belt is unsound as it is drawn to unreasonably restrict development opportunities for the necessary growth of York.

- The Sustainability Appraisal fails to provide a comparative assessment of Site 871: Land at North Field, York against the selected sites.
- The A1237 to the west of Acomb would form a logical, permanent and strong Green Belt boundary and a well-defined edge to the built-part of the city at this point.

6.4 Our client's land at North Field, York is fully deliverable and represents one of the most appropriate sites for allocation when considered against reasonable alternatives. In addition, our client and the relevant landowners are willing parties.

6.5 Gallagher respectfully maintains that Land at North Field, York, SHLAA ref. 871 should be released from the Green Belt to be (at very least) designated as safeguarded land. However, in the first instance we consider the land should be allocated for housing within the plan period for the extensive reasons noted within these representations.

**Proposed Modifications to the York Local
Plan: OAN Critique**
L&Q Estates Limited
(formerly Gallagher Estates)

July 2019

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1. Introduction

- 1.1 This report has been prepared by Turley on behalf of L&Q Estates – formerly Gallagher Estates – to review and critique the Housing Needs Update¹ published by the City of York Council (‘the Council’) in January 2019. The review is undertaken in the context of the Council’s ongoing consultation on proposed modifications² to its submitted Local Plan, which runs until 22 July 2019.
- 1.2 Through this consultation, the Council has proposed to lower its emerging housing requirement, from 867 to 790 dwellings per annum, to precisely align with the objectively assessed need (OAN) concluded in the Housing Needs Update. This report strongly challenges the basis for such a reduction, and indicates that the level of housing provision now proposed by the Council – or indeed previously proposed – would fail to meet the housing needs of York in full. Earlier submissions on behalf of L&Q Estates have expressed similarly fundamental concerns³.
- 1.3 Beyond the overall level of housing growth planned and needed, this report further considers the size and type of housing likely to be needed in York; a requirement of the relevant National Planning Policy Framework⁴ (NPPF) and its associated guidance. This is omitted from the recently published Housing Needs Update, but provides important context in appraising the extent to which the profile of housing supply proposed by the Council will ensure that housing needs are met in full.

Structure

- 1.4 This report is structured as follows:
- **Section 2 – Introducing the Emerging Policy Position** – a chronology of the Council’s approach to evidencing and planning for housing needs, including an overview of the factors that have been claimed by the Council in its evidence base to lower housing need in York relative to earlier evidence;
 - **Section 3 – Critique of the OAN** – a further interrogation and critique of the key inputs to the revised OAN calculation, including the demographic projections, employment growth forecasts and market signals adjustments;
 - **Section 4 – Size and Type of Housing Needed** – the overall need for housing in York is broken down to estimate the proportionate split between houses and flats, in the absence of such analysis in the Housing Needs Update; and
 - **Section 5 – Summary and Conclusions** – a concise overview of the conclusions and implications of this report.

¹ GL Hearn (January 2019) City of York – Housing Needs Update [EX/CYC/9]

² City of York Council (June 2019) City of York Local Plan: Proposed Modifications

³ See Appendix 1 of Gallagher Estates’ submission to the Regulation 19 consultation in March 2018 (Ref 604). This appended and referred to an “Updated Review of the Objectively Assessed Need for Housing in York”, dated October 2017, and an earlier report dated September 2016

⁴ DCLG (2012) National Planning Policy Framework, paragraphs 50 and 159

2. Introducing the Emerging Policy Position

- 2.1 This section provides a chronological overview of the housing need evidence commissioned by the Council, and its proposed approach to meeting this need based on public consultations and correspondence with the Inspectors following submission of the Local Plan.

OAN Evidenced at Submission

- 2.2 The York Local Plan was submitted for examination in May 2018, with its evidence base including a Strategic Housing Market Assessment Update⁵ ('the SHMA Update') produced in May 2017. This represented the latest OAN evidence commissioned by the Council, completed in the context of the relevant NPPF and Planning Practice Guidance (PPG).
- 2.3 The SHMA Update concluded that 953 dwellings per annum are needed in York over the plan period (2012-32). As shown at Table 2.1 overleaf, this was principally derived from its '*starting point*' of the 2014-based household projections, which were found to be predicated upon a '*level of population growth which is higher than any recent historic period or any trend based forecast of growth*'. It was nonetheless concluded that '*a positive step*' would be to '*consider these as the preferred population growth scenario*', with lower sensitivity scenarios '*not...defensible given the very strong recent trends*'⁶ in population growth. It continued by stating that:
- "A clear and evermore consistent migration trend is appearing and could not fully justify any move away from the official projections. Doing so would risk under-estimating the true housing need in the City"*⁷
- 2.4 The 2014-based household projections therefore form the demographic basis of the OAN concluded in the SHMA Update, and are uplifted by 10% '*to respond to housing market signals and to enhance affordable housing delivery*'⁸. While there was not '*a full update to the analysis of economic growth*', it was concluded that '*there is unlikely to be any justification for an uplift to housing numbers in the City to support expected growth in employment*'⁹.

⁵ GL Hearn (May 2017) City of York Council Strategic Housing Market Assessment – Addendum Update [SD050]

⁶ *Ibid*, paragraphs 2.11 and 2.12

⁷ *Ibid*, paragraph 2.13

⁸ *Ibid*, paragraph 3.30

⁹ *Ibid*, paragraphs 4.4 and 5.5

Table 2.1: Basis of OAN Concluded in the SHMA Update (2017)

	Dwellings per annum 2012-32	Adjustment from 'starting point'
2014-based projections – the 'starting point'	867	–
Preferred demographic projection	867	0%
Market signals adjustment (+10%)	953	+10%
Objectively assessed need	953	+10%

Source: GL Hearn, 2017

- 2.5 The SHMA Update was prefaced by a note, drafted by the Council, to provide 'introduction and context to [the] objective assessment of housing need'¹⁰. This "accepted" the figure of 867 dwellings per annum as 'the relevant baseline demographic figure', but noted that:

*"Executive also resolved that the recommendation prepared by GL Hearn in the draft Strategic Housing Market Assessment, to apply a further 10% to the above figure for market signals (to 953 dwellings per annum), is not accepted on the basis that Hearn's conclusions were speculative and arbitrary, rely too heavily on recent short-term unrepresentative trends and attach little or no weight to the special character and setting of York and other environmental considerations"*¹¹ (emphasis added)

- 2.6 The Council therefore dismissed the market signals adjustment applied by its consultants, and consequently selected a figure that was derived from only a partial application of the PPG methodology. The submitted version of the Local Plan – like the Pre-Publication version, which was subject to consultation in autumn 2017 – misleadingly labelled this preferred figure of 867 dwellings per annum as 'an objectively assessed need'¹², and entirely omitted reference to the OAN for 953 dwellings per annum concluded in the SHMA Update.

Reaction to the Council's Approach

- 2.7 As noted within our previous submission, the Council was aware of the widespread objection to its proposed requirement for 867 dwellings per annum following consultation on the Pre-Publication version in autumn 2017. This reflected the departure from the conclusions of the SHMA Update and its resulting lack of conformity with existing and emerging national policy¹³. The Local Plan Working Group (LPWG) met in January 2018 and were advised that:

¹⁰ City of York Council (September 2017) City of York Strategic Housing Market Assessment Update, Introduction and Context to Objective Assessment of Housing Need [SD050]

¹¹ *Ibid*

¹² City of York Council (February 2018) City of York Local Plan – Publication Draft, Regulation 19 Consultation, paragraph 3.3

¹³ City of York Council (23 January 2018) Local Plan Working Group – Report of the Assistant Director of Planning and Public Protection [Agenda Item 4]

*“Members must be satisfied that they consider the Submission Draft Plan meets the test of “soundness”. This is a statutory duty. Officers’ advice is that the direction of travel in national policy indicates that if the site proposals previously consulted on were increased this would be a more robust position...In Officers’ opinion, **an increase in the supply of housing** would place the Council in a better position for defending the Plan proposals through the Examination process”¹⁴ (emphasis added)*

- 2.8 The minutes of the subsequent Executive meeting on 25 January 2018 confirmed that the recommendations of the LPWG differed from officers’ advice. As a consequence, the Publication draft of the Local Plan – submitted for examination in May 2018 – retained the requirement for 867 dwellings per annum, against officers’ advice.
- 2.9 This continued to be strongly challenged by Gallagher Estates (now L&Q Estates) and other representors, building upon and reiterating the concerns raised at earlier stages of consultation that were summarised in our previous submission¹⁵. At a fundamental level, the attempt to depart from the OAN concluded in the SHMA Update was widely criticised. This criticism was reinforced by evidence of a higher OAN, with the then-outcome of the standard method and three alternative assessments submitted by representors each independently concluding that at least 1,070 dwellings per annum are needed in York¹⁶.
- 2.10 As shown in Table 2.2, the standard method continues to indicate that such a level of provision is the minimum needed in the city, albeit it is accepted that the Local Plan was submitted prior to its implementation through national policy.

Table 2.2: Up-to-date Application of Standard Method for York

	Baseline	Affordability ratio	Uplift	Outcome
York	820	8.86	30.4%	1,069

Source: MHCLG; ONS

- 2.11 Housing need was immediately identified as an area of ‘*particular concern*’ by the Inspectors appointed to examine the Local Plan, as documented within their initial observations in July 2018¹⁷. The Inspectors observed that the preface to the SHMA Update was ‘*not the work of GL Hearn and is not part of the SHMA Update, as such*’. They referred to the Council’s claim that its adjustments were ‘*speculative and arbitrary*’, but noted that ‘*precisely what it is about the SHMA Update that the Council considers “speculative and arbitrary” is not apparent to us*’. Similarly, it was unclear to the Inspectors as to why the Council considered ‘*the SHMA Update to be “too heavily reliant on recent short-term unrepresentative trends”*’. They also reinforced that ‘*difficulty in housing delivery and the existence of environmental constraints have no place in identifying the OAN*’.

¹⁴ *Ibid*, paragraphs 26 and 27

¹⁵ Section 3 of our “Further Review of the Objectively Assessed Need for Housing in York”, March 2018 [Appendix 1 to Gallagher Estates’ submission, reference 604]

¹⁶ *Ibid*, Figure 3.1

¹⁷ Letter to City of York Council from Planning Inspectors, 24 July 2018 [EX/INS/1]

2.12 The Inspectors concluded that:

“As things presently stand, we have significant concerns about the Council’s stance regarding the OAN. The evidence necessary to demonstrate that the 867dpa figure used in the plan is properly justified is absent from the documents submitted so far. On the contrary, the evidence produced for and submitted by the Council does rather more to suggest that the 867dpa figure is not justified”¹⁸

2.13 The Council’s response to the Inspectors committed to setting out a timetable for a full response during the first week of September¹⁹. This self-imposed deadline was not met.

Housing Needs Update and Proposed Modifications

2.14 The Council’s delay in responding to the Inspectors’ initial observations extended beyond the publication date of the 2016-based household projections on 20 September 2018. The Council’s LPWG met on this date to discuss the housing issues raised by the Inspectors, in the knowledge that the 2016-based sub-national population projections (SNPP) had been released in May with a ‘*marked downward trend*’ implied for York²⁰. Members were advised that:

“...irrespective of the issues of clarification raised by the Inspector, new evidence has been released which appeared to show a substantive change in the demographic starting point or baseline for the Plan period and that officers considered that this new evidence must be analysed and the potential implications for the submitted Plan understood”²¹

2.15 The Council belatedly responded to the Inspectors on 13 November, though did not explicitly respond to each of the points raised through earlier correspondence. Instead, it referred to the publication of the 2016-based household projections and described ‘*a state of flux*’ in the national policy context as a result of the Government’s then-ongoing revision of its standard method²². It suggested that a process of ‘*dialogue*’ with the Ministry of Housing, Communities and Local Government (MHCLG) was ongoing ‘*in the light of these recent developments*’, with the Council considering that:

“...in order to achieve a robust and up-to-date Plan, the implications of the Government’s emerging position should also be clarified and understood before a final OAN figure is settled through the examination process...Subject to the issue of the draft guidance...we expect to conduct this review and to update you on its conclusions by early in the New Year”²³

¹⁸ *Ibid*

¹⁹ Letter to Planning Inspectors from City of York Council, 9 August 2018 [EX/CYC/4]

²⁰ Minutes of the Local Plan Working Group meeting (20 September 2018)

²¹ *Ibid*

²² Letter to Planning Inspectors from City of York Council, 13 November 2018 [EX/CYC/7]

²³ *Ibid*

- 2.16 The Inspectors' response²⁴ requested further detail on the outcome of the Council's dialogue with MHCLG, and directly questioned why clarity on emerging changes to the standard method was necessary given the Council's submission within the transition period from the previous NPPF. The Inspectors were clear that *'the 2012 NPPF requires that an OAN figure be identified'*, and outlined that:

*"The starting point for our examination is that the Council has submitted what it considers to be a sound plan. Given this, and in light of the above, unless the Council considers the OAN currently identified to be unsound in some way, we intend to now proceed to the first phase of hearings as expediently as possible..."*²⁵

- 2.17 Following this correspondence, interested parties were advised on 11 January 2019 that a first phase of hearings – to include consideration of the OAN – would be held in March/April²⁶.
- 2.18 The expedient progress sought by the Inspectors was jeopardised by the Council's publication of new OAN evidence less than three weeks later, as referenced in its subsequent letter to the Inspectors²⁷. This evidence took the form of a "Housing Needs Update", dated January 2019²⁸. It concludes with an OAN of 790 dwellings per annum; some 17% lower than the need for 953 dwellings per annum identified through the SHMA Update, and 9% below the requirement for 867 dwellings per annum proposed in the submitted Local Plan. It is also some 26% below the current outcome of the standard method, noting the Council's previous reference to the *'emerging position'*.
- 2.19 The Housing Needs Update refers to the 2016-based household projections as its *'starting point'*, deriving a need for 484 dwellings per annum from this dataset over a longer plan period (2012-37). This almost halves the *'starting point'* of the SHMA Update (867dpa) which drew upon the 2014-based household projections.
- 2.20 This has a further effect in moderating the absolute impact of the proportionate adjustment applied to respond to recent market signals, which are reviewed again in the Housing Needs Update to reflect the latest available data. It concedes that market signals now justify a larger uplift of 15%, and chooses to apply such an adjustment to its *'starting point'* to generate a figure (557dpa) that remains some way short of the previous OAN.
- 2.21 As a result, the OAN itself is ostensibly linked to the economy, aiming to provide the labour force required to support an employment forecast historically referenced elsewhere in the Council's evidence base²⁹. It is concluded that the 2016-based projections would not provide a sufficient growth in the labour force to support this forecast, requiring increased in-migration with implications for population and household growth. This would require provision for 590 dwellings per annum when applying the household formation rates assumed in the 2016-based household

²⁴ Letter to City of York Council from Planning Inspectors, 14 December 2018 [EX/INS/2]

²⁵ *Ibid*

²⁶ Initial letter to representors from Programme Officer [EX/INS/3]

²⁷ Letter to Planning Inspectors from City of York Council, 29 January 2019 [EX/CYC/8]

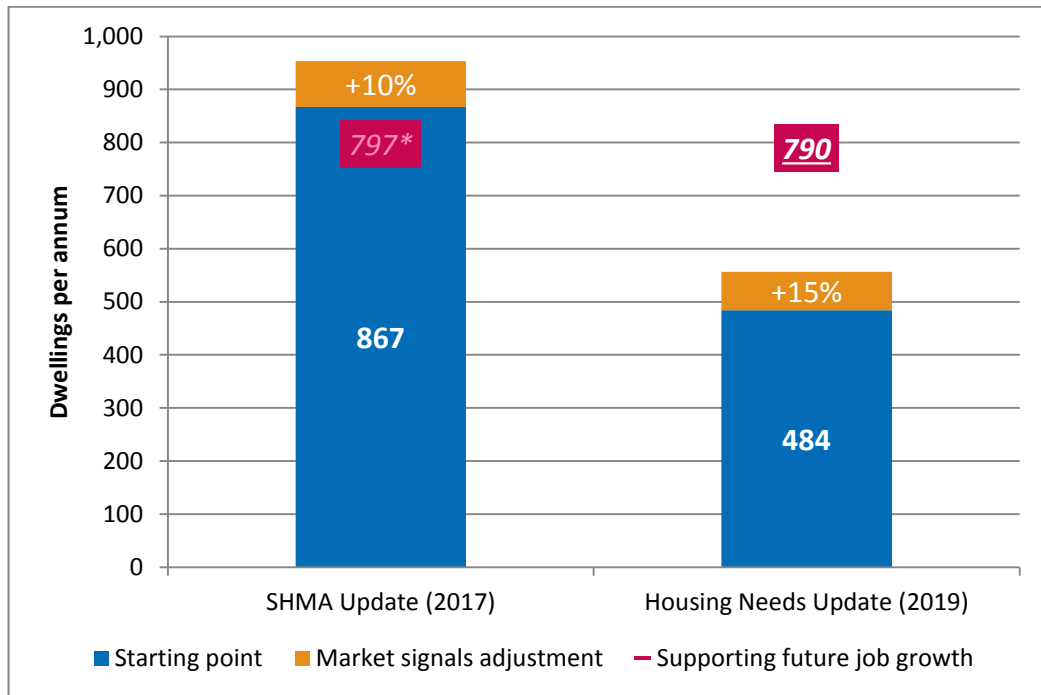
²⁸ GL Hearn (January 2019) City of York – Housing Needs Update [EX/CYC/9]

²⁹ City of York Council (September 2017) Employment Land Review Update [SD063]

projections, though the Housing Needs Update correctly acknowledges that these assumptions *'have not been met uncritically'*³⁰. It therefore tests the impact of applying 2014-based household formation rate assumptions to the *same* population, which generates a higher need for 735 dwellings per annum. This increases further to **790 dwellings per annum** where allowance is made for a partial return to historic trends for younger age groups (aged 25-44), providing the basis for the concluded OAN.

2.22 This is illustrated in Figure 2.1, which shows how the respective starting points have been proportionately adjusted in the SHMA Update and Housing Needs Update. Unlike in 2017, the lower *'starting point'* in the latter is claimed to bring demographic needs below the level of housing provision required to support future job growth, which now results in a "jobs-led" OAN for York. The SHMA Update notably considered this to be a remote prospect and did not present any jobs-led modelling scenarios, though did refer to modelling from the earlier 2016 SHMA which is included below for context³¹.

Figure 2.1: Basis of Respective Conclusions of OAN (2017/2019)



Source: Turley analysis of GL Hearn modelling

* 2016 SHMA modelling

2.23 In introducing the Housing Needs Update to the Inspectors, the Council took the view that:

³⁰ GL Hearn (January 2019) City of York – Housing Needs Update [EX/CYC/9] paragraph 2.17

³¹ GL Hearn (May 2017) City of York Council Strategic Housing Market Assessment – Addendum Update [SD050] paragraphs 4.2 and 4.3

“...in order to achieve a robust and up to date Plan it is necessary to consider the implications of the newly published national evidence before a final OAN is settled through the examination process”³²

- 2.24 It proceeded to claim that the OAN concluded in the Housing Needs Update confirms that *‘the 867 dwellings per annum proposed in the submitted Plan can be shown to robustly meet requirements’³³*.
- 2.25 The Council has, however, since proposed a series of modifications to the Local Plan to lower the housing requirement and precisely align with the OAN concluded in the Housing Needs Update³⁴. This followed correspondence with the Inspectors, who observed that the previous requirement was *‘higher than the number of houses the Council now considers to be needed’* and requested *‘a short paper setting out the justification for this’³⁵*.
- 2.26 The Inspectors simultaneously requested a further period of consultation to reflect the Council’s submission of *‘quite substantial new evidence of a fundamental nature’*. It was anticipated that this consultation would run from mid-March to allow Phase 1 hearings to begin in June, although this did not happen and the consultation on proposed modifications commenced on 10 June.

Summary

- 2.27 The Council has historically evidenced a need for 953 dwellings per annum in York, though chose not to accept this conclusion in an approach that was widely criticised during earlier consultations. Respondents cited independent evidence of a greater need for at least 1,070 dwellings per annum, which exceeded the Council’s proposed housing requirement (867dpa) by some 23%.
- 2.28 Following submission of the Local Plan, the Inspectors immediately identified housing need as an area of particular concern, due to a lack of justification for the Council’s proposed approach. The Council committed to responding to these concerns in a timely manner, but seemingly delayed its response to benefit from lower 2016-based household projections and ongoing uncertainty around the outcome of the standard method for assessing housing need.
- 2.29 The Inspectors questioned why such a delay was necessary, and had intended to swiftly proceed to the first phase of hearings based on the OAN evidence that had been submitted by the Council. This progress was, however, jeopardised by the Council’s publication of new evidence which claimed that the OAN had reduced to 790 dwellings per annum. This was markedly influenced by the 2016-based population and household projections, which suggested a substantially lower level of growth than was considered reasonable and *‘positive’* in the previous iteration of the Council’s evidence base. Demographic need is claimed to have changed so significantly that the OAN itself

³² Letter to Planning Inspectors from City of York Council, 29 January 2019 [EX/CYC/8]

³³ *Ibid*

³⁴ City of York Council (June 2019) City of York Local Plan: Proposed Modifications

³⁵ Letter to City of York Council from Planning Inspectors, 12 February 2019 [EX/INS/4]

is now linked to an employment forecast that was historically referenced elsewhere in the Council's evidence base.

- 2.30 The Council has proposed a series of modifications to the Local Plan to lower the housing requirement and precisely align with the OAN for 790 dwellings per annum. This is a 9% reduction from its submitted housing requirement, and a 17% reduction from the OAN evidenced in 2017. It is at least 26% lower than the need for at least 1,070 dwellings per annum advanced by various representors during earlier stages of consultation, which is also generated by the standard method.
- 2.31 It is evident from the summary of the Council's changing OAN position that it has sought every opportunity to present the lowest concluded need it considers that it can justify, with this contributing to a significant delay in the progress of the Plan both prior to and following submission. The OAN concluded within the latest Housing Needs Update must be considered in this context.

3. Critique of the OAN

3.1 This section technically critiques the OAN concluded in the Housing Needs Update. In the context of the relevant PPG, it focuses on:

- The **demographic need for housing**, specifically considering the conclusion advanced that the 2016-based sub-national population and household projections present a reasonable picture of demographic needs in the local circumstances of York;
- The proposed **response to market signals** of imbalance between supply and demand, and the impact of applying this to a reasonable demographic projection; and
- The housing needed to **support future job growth**, specifically reviewing the employment forecast that is now integral to the concluded OAN

3.2 Consideration of the above factors is prefaced by an overview and critique of the claimed justification for the Housing Needs Update.

Justification for the Housing Needs Update

3.3 The Housing Needs Update was evidently commissioned by the Council to take into account the lower level of population and household growth projected under the 2016-based sub-national population and household projections (SNPP/SNHP). The 2016-based SNPP were released on 24 May 2018, one day before the Local Plan was submitted for examination by the Council. The 2016-based household projections were published almost four months later, on 20 September 2018.

3.4 It is recognised that the relevant PPG requires the '*latest available*' household projections to be used as the '*starting point*' when assessing housing needs³⁶. It equally makes clear that '*wherever possible, local needs assessments should be informed by the latest available information*'³⁷. This information may signal '*a meaningful change in the housing situation*', albeit the guidance is clear that assessments are not '*automatically...rendered outdated every time new projections are issued*'³⁸.

3.5 This requirement to take '*the latest available information*' into account does, however, predate the publication of the 2016-based projections, which have been extensively scrutinised since their release. The Government has described its fundamental concerns with the 2016-based household projections, and made clear its view that they '*should not be used as a reason to justify lower housing need*'³⁹. It has been explicitly aware of '*concerns about not using the latest evidence*', but has still taken this position due to overriding concerns about the reliability of the latest projections for the

³⁶ PPG Reference ID 2a-015-20140306 and 2a-016-20150227

³⁷ PPG Reference ID 2a-016-20150227

³⁸ *Ibid*

³⁹ MHCLG (2019) Government response to the technical consultation on updates to national planning policy and guidance: a summary of consultation responses and the Government's view on the way forward, p6

purposes of assessing housing need⁴⁰. Although its concerns were raised in the context of the standard method and the revised NPPF, the Government has indicated that this should continue to provide '*relevant background to the level of weight that should be afforded to the revised household projections*' even where – as in York – plans are being examined in the context of the earlier NPPF⁴¹.

- 3.6 In taking this view, the Government referred to the 62 strategic plans that were being examined under the transitional arrangements of the revised NPPF as of October 2018. It was explicitly seeking to prevent the '*delays and uncertainty*' which had already been caused in such areas by often significant changes between the 2014-based and 2016-based household projections. This strongly indicates that any delay or lowering of need caused by integrating the new projections must be very carefully considered and justified.
- 3.7 Such a view was implicit in a newsletter issued by the Planning Directorate of MHCLG in November 2018, which reaffirmed that '*Plans submitted on or before 24 January can be based on **existing assessments** of housing need*'⁴² (emphasis added). In the case of York, this would have been the 2017 SHMA Update.
- 3.8 Similarly, the Inspectors examining the Local Plan did not appear to request consideration of the new projections, or an update to the OAN. To the contrary, they clearly intended to proceed on the basis that '*the Council has submitted what it considers to be a sound plan*'⁴³, thereby continuing to rely upon and examine the SHMA Update produced in 2017 and the extent to which it provided supporting justification for the housing requirement.
- 3.9 Given this important informing context, we consider that such a '*fundamental*'⁴⁴ change in the underlying evidence base was not necessary or appropriate at this stage of the examination process, in the circumstances of York.

Identifying a Reasonable Demographic Projection for York

- 3.10 Any demographic '*starting point*' in the calculation of housing need is underpinned by a projection of population growth, and assumptions on household formation. These elements are separately considered below.

Reasonable Population Projection

- 3.11 As introduced in section 2, the SHMA Update concluded that the use of the 2014-based SNPP would be '*a positive step*' which reflects '*very strong recent trends*' in York and avoids the risk of underestimating the demographic need for housing⁴⁵. The use of the 2014-based SNPP has been supported by L&Q Estates in its previous submissions, as

⁴⁰ *Ibid*

⁴¹ London Plan Written Representation by the Ministry of Housing, Communities and Local Government (Reference ID 2631 – Housing Requirement, matter 17s)

⁴² MHCLG (November 2018) Planning Update Newsletter

⁴³ Letter to City of York Council from Planning Inspectors, 14 December 2018 [EX/INS/2]

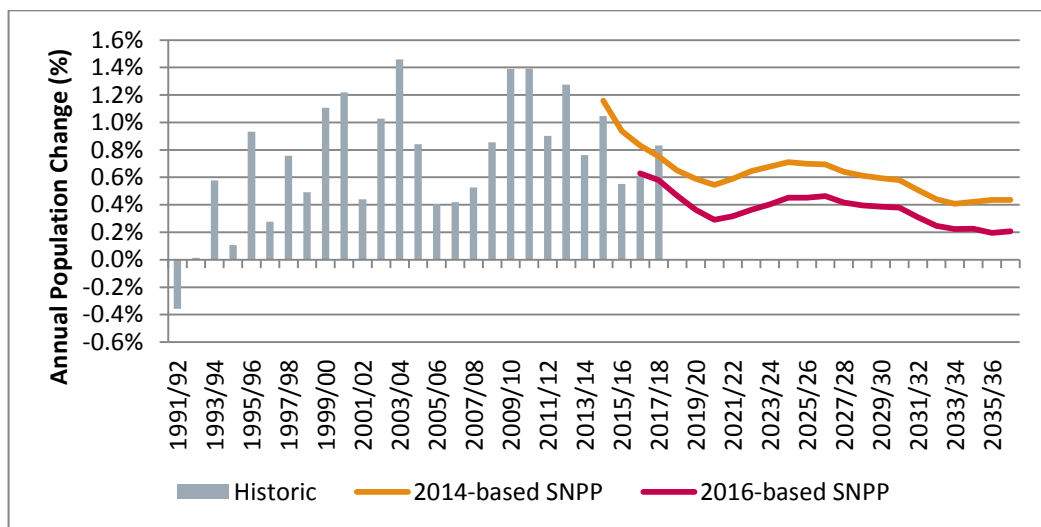
⁴⁴ Letter to City of York Council from Planning Inspectors, 12 February 2019 [EX/INS/4]

⁴⁵ GL Hearn (May 2017) City of York Council Strategic Housing Market Assessment – Addendum Update [SD050] paragraphs 2.11 – 2.13

well as other representors. The Government is also satisfied that this projection currently provides the most appropriate basis from which to understand future housing needs, at least in the short-term, given its continued integration within the standard method.

- 3.12 The Housing Needs Update chooses to revisit this conclusion of the SHMA Update, and now describes the 2016-based SNPP as ‘*a more robust assessment of population growth for York than their predecessor*’⁴⁶. It therefore favours a projection that, between 2012 and 2037, downgrades future population growth in York by over one third (35%) relative to the earlier projection, despite giving only cursory consideration to the factors and assumptions that have led to such a divergence and the confidence placed in the earlier dataset.
- 3.13 A change of this magnitude should not be accepted uncritically, particularly given the volatility of trend-based projections and their sensitivity to underlying assumptions and trend periods. Such a shift appears potentially anomalous in the context of the ‘*very strong*’ demographic pressures identified in York only two years ago, in the SHMA Update. The evidence which supported this conclusion is largely unchanged.
- 3.14 At a basic level, the projected rate of population growth assumed in the 2016-based SNPP is comparatively modest in the context of long-term historic trends. The population of York has annually grown by an average of 0.7% since 1991, which aligns relatively closely with the growth anticipated by the 2014-based SNPP over the period to 2037 (0.6%). In contrast, the 2016-based SNPP assumes an average growth of only 0.4% per annum. This long-term projected rate of growth has, on an annual basis, been exceeded in 23 of the past 27 years, and would clearly represent a notable departure from historic evidence. Such a scale of difference warrants careful consideration in order to ensure that there is not a risk that this projection will underestimate the future population growth of York.

Figure 3.1: Comparing Historic and Projected Rates of Population Growth

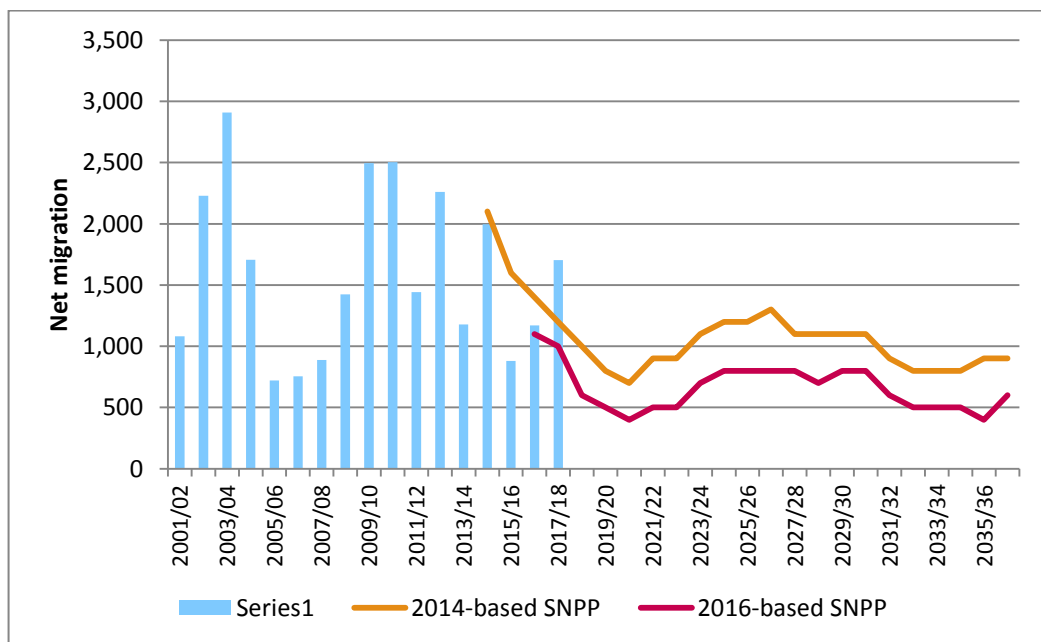


Source: ONS

⁴⁶ GL Hearn (January 2019) City of York – Housing Needs Update [EX/CYC/9] paragraph 5.2

- 3.15 The Housing Needs Update examines the individual components of projected change under the 2016-based SNPP, isolating the contribution of migration and natural change (births minus deaths). It broadly considers the 2016-based assumptions to be more reflective of recent trends, but such conclusions appear premature and potentially inaccurate in the context of the latest population estimates released by the Office for National Statistics (ONS) in June 2019.
- 3.16 Over the initial two years of its projection period (2016-18) the 2016-based SNPP anticipated a net inflow of only 2,100 people from elsewhere in the UK or internationally. The ONS has estimated that a larger net inflow of some 2,873 people has actually occurred over this period, demonstrating a much closer alignment with – though still exceeding – the 2014-based SNPP which assumed a net inflow of 2,600 people.
- 3.17 The longer-term migration assumptions of the 2014-based SNPP also appear more reasonable in the context of historic trends in York, as shown in the following chart. The 2016-based SNPP, in contrast, assume that annual inflows will reduce in the short-term and thereafter be no higher than 800 people. This is despite historic inflows exceeding this level in all but two of the past 17 years, and recent evidence of a growing net inflow.

Figure 3.2: Comparing Historic and Projected Net Migration to York



Source: ONS

- 3.18 The Housing Needs Update considered that the migration assumptions of the 2016-based SNPP ‘more closely follow on from the more recent trends’⁴⁷, but this is clearly no longer the case following the release of the latest population estimates that show a growing net inflow of people into York. This is consistent with the ‘clear and evermore

⁴⁷ Ibid, paragraph 2.9

consistent migration trend’ previously and correctly identified in the SHMA Update⁴⁸, with no evidence to suggest that this trend is diminishing. This undermines the Council’s decision to switch to a preference for the 2016-based SNPP, which are based upon a marked departure from recent demographic trends in York with no evidence that such a change is more likely to occur.

- 3.19 On the basis of the latest demographic evidence, the 2014-based SNPP are considered to remain a more appropriate demographic projection for York, allowing for a reasonable level of future population growth and net migration that is more in line with historic trends. This is consistent with the conclusions of the SHMA Update, which viewed the use of this projection as a *‘positive step’* that fully acknowledges recent demographic trends and averts the risk of underestimating future population growth. The use of the substantially lower 2016-based SNPP, by contrast, would be an implicitly *negative* approach, which appears likely to underestimate future growth and is not adequately justified in the Council’s evidence.

Reasonable Assumptions on Household Formation

- 3.20 The Housing Needs Update correctly acknowledges that the household formation rates assumed in the 2016-based household projections have been subject to criticism since their release. It describes how:

*“The main change is the period from which household formation rates trends have been drawn. Previously these were based on trends going back to 1971 but in the most recent projections trends have only been taken from 2001. It is argued that by focussing on shorter term trends **ONS have effectively locked in deteriorations in affordability and subsequently household formation rates particularly within younger age groups in that time**”⁴⁹ (emphasis added)*

- 3.21 This is consistent with the views of Government, which has warned that:

“Reducing the historic period of household formation on which the projections are based from five census points to two...focuses it more acutely on a period of low household formation where the English housing market was not supplying enough homes”⁵⁰

- 3.22 The ONS⁵¹ has itself acknowledged that the methodological changes implemented through the 2016-based household projections could *‘result in a downward trend in household formation for the younger age groups, which in turn would downplay the need for housing for younger people’*. It recognises that *‘users [may] wish to investigate the impact of the change in the...methodology on the household projections’*.

- 3.23 This reinforces the need to interpret the 2016-based assumptions on household formation rates with extreme caution. Any marked reduction is potentially a simple

⁴⁸ GL Hearn (May 2017) City of York Council Strategic Housing Market Assessment – Addendum Update [SD050] paragraph 2.13

⁴⁹ GL Hearn (January 2019) City of York – Housing Needs Update [EX/CYC/9] paragraphs 2.20 and 2.21

⁵⁰ MHCLG (October 2018) Technical consultation on updates to national planning policy and guidance, paragraph 11

⁵¹ ONS (2018) Methodology used to produce household projections for England: 2016-based

consequence of methodological changes that have been intensely scrutinised since their release.

- 3.24 The Housing Needs Update shows that these methodological changes have a significant impact in York. Its Table 6 compares the housing need implied when applying 2014-based and 2016-based rates to an identical population projection (2016-based SNPP). This shows that the annual need is some 30% higher when applying 2014-based rates, relative to outcomes derived from the 2016-based rates (629/484dpa respectively). This illustrates the extent to which the 2016-based rates are likely to underestimate household formation in York, notwithstanding their application to a misrepresentative population projection.
- 3.25 Divergence from the *'starting point'* of the 2016-based household projections increases further to 40% where the 2014-based rates are adjusted to allow for a partial return to historic trends for younger people, in order to avoid *'locking in...historic deteriorations and ensuring that these improve in future'*⁵². Such a demographic adjustment is strongly supported, as is the principle of retaining 2014-based household formation rates in preference to the 2016-based assumptions.
- 3.26 The Housing Needs Update does, however, proceed to retain the unadjusted 2016-based household projections as its *'starting point'* from which any subsequent adjustment should be benchmarked⁵³. This is despite acknowledgement that they have been extensively criticised and viewed as unrepresentative of future needs. As such, it blurs the adjustments needed to correct a dataset that the Government considers to be significantly flawed, and those required to respond to market signals of imbalance between supply and demand. This approach is not considered to be justified or appropriate.
- 3.27 The previous section concluded that the 2014-based SNPP provide a reasonable population projection for York. This section strongly indicates that the 2014-based household formation rates should be retained, in preference to the 2016-based assumptions that have been widely viewed as unreliable and should therefore be attributed little or no weight at the current point in time for the purposes of calculating future housing need.
- 3.28 Collectively, this indicates that the 2014-based household projections should be retained as the demographic *'starting point'* when assessing housing needs in York. When applying a consistent allowance for vacancy, this dataset provides a *'starting point'* of **835 dwellings per annum** over the period now covered by the Housing Needs Update (2012-37). This *'starting point'* exceeds the OAN concluded in the Housing Needs Update (790dpa) and would increase still further where any assumed *'deterioration'* in younger household formation is positively addressed, as considered necessary and reasonable within the Housing Needs Update.

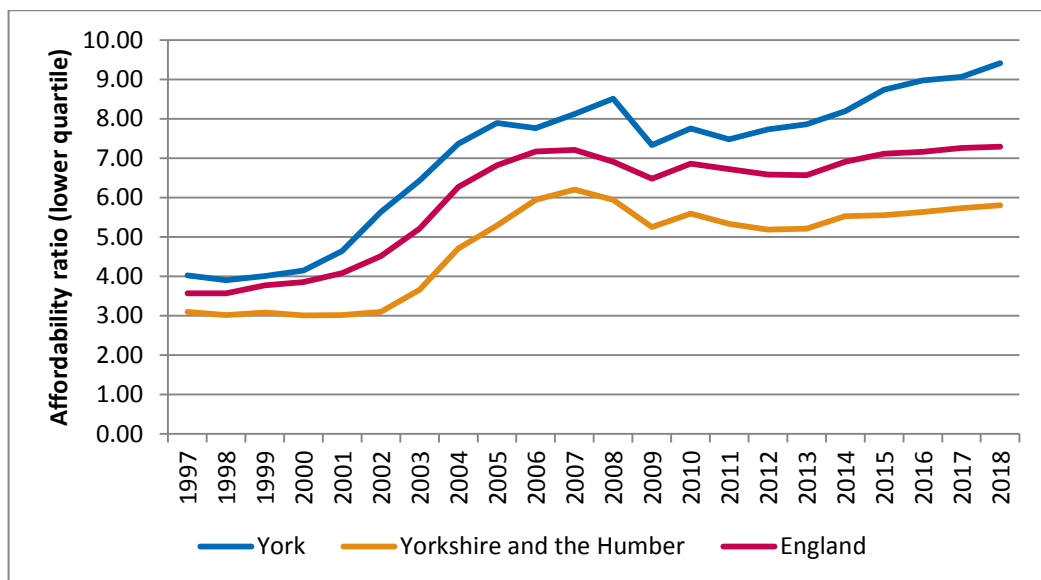
⁵² GL Hearn (January 2019) City of York – Housing Needs Update [EX/CYC/9] paragraph 3.19

⁵³ *Ibid*, paragraph 2.26

Responding to Market Signals

- 3.29 The SHMA Update previously concluded that the *'starting point'* of the 2014-based household projections should be uplifted by 10% to reflect market signals of imbalance between supply and demand. The Inspectors challenged an attempt by the Council to omit such an uplift, as outlined in section 2.
- 3.30 The Housing Needs Update provides an updated review of market signals, identifying that *'house prices have increased in the past year and the affordability ratio between house prices and earnings has worsened'*⁵⁴. The imbalance between house prices and earnings in York is actually more severe than it claims, with the latest ONS statistics confirming that entry-level house prices equate to some 9.41 years earnings as of 2018⁵⁵. This is substantially higher than the ratio of 7.26 cited at Table 12 of the Housing Needs Update, and indeed the origin of this figure is extremely unclear given that the ONS has not recorded such a low affordability ratio in York for fifteen years.
- 3.31 As shown in the following chart, the affordability situation in York has continued to worsen, with the ratio increasing by 20% over the past five years alone. This is almost double the growth recorded regionally and nationally during the same period (both 11%). The current ratio is also notably higher than the national average, undermining the unfounded claim of the Housing Needs Update that the affordability ratio of York is *'less than the rest of England'*⁵⁶.

Figure 3.3: Lower Quartile Affordability Ratio in York



Source: ONS

- 3.32 Though informed by seemingly inaccurate data, the Housing Needs Update concludes that *'an uplift in the region of 15% would seem reasonable'* in response to market

⁵⁴ *Ibid*, paragraph 4.29

⁵⁵ ONS (2019) Housing affordability in England and Wales, Table 6c

⁵⁶ GL Hearn (January 2019) City of York – Housing Needs Update [EX/CYC/9] paragraph 4.18

signals⁵⁷. This is evidently a more pronounced uplift than previously recommended in the SHMA Update, reflecting the further deterioration of market conditions in York in the intervening period. It is agreed that a more pronounced uplift is appropriate within this context, and a still greater uplift may indeed be justified given that this conclusion appears to have been based on inaccurate affordability data which understated the severity of the issue.

- 3.33 Uplifting the 2014-based household projections by 15% would suggest a need for **966 dwellings per annum**. This would be considered an absolute minimum need, given that it makes no explicit allowance to improve suppressed younger household formation. This could cumulatively lead to a larger uplift of 20%, which would imply a need for **in the order of 1,000 dwellings per annum** over the period from 2012 to 2037. It is of note that Turley has previously concluded that such a level of need exists in York within its submissions on behalf of L&Q Estates, with this outcome also proportionate to the standard method and the concluded levels of housing need previously submitted by other representors.

Supporting Future Job Growth

- 3.34 As shown at Figure 2.1 of this report, the Council's latest evidence arrives at the conclusion that the OAN is based on a "jobs-led" projection of need as a result of its view that demographic needs have significantly fallen. This position is arrived at based on a recognition that the 2016-based SNPP will not provide the labour force needed to support forecast employment growth, and therefore makes allowance for higher levels of net in-migration beyond that assumed in the demographic projection.
- 3.35 It is agreed that an assessment of the implications of job growth on the scale of housing needed is required in the context of the relevant PPG⁵⁸. The approach taken to model the relationship between job growth and population, and therefore housing need, is also considered to be broadly appropriate, based on a review of the input labour-force assumptions.
- 3.36 Given the reliance now placed on this step of the PPG methodology, however, it is concerning that the Housing Needs Update draws upon the '*most recent*' assessment of the '*economic growth potential*' of York by referring to baseline forecasts by Oxford Economics that were originally produced over four years ago in May 2015⁵⁹, and subsequently adjusted in an Employment Land Review⁶⁰ (ELR) dated July 2016. With the most recent OAN now seeking to justify its calculation of need on the basis of supporting likely employment growth, it is considered that attention must be given as to whether the forecasts remain up-to-date and reasonable.
- 3.37 An ELR Update was produced in September 2017, and identified that more recent baseline forecasts were suggesting an overall level of employment growth that was

⁵⁷ *Ibid*, paragraph 4.34

⁵⁸ PPG Reference ID 2a-018-20140306

⁵⁹ City of York Council (September 2017) Employment Land Review Update [SD063] Paragraph 2.1 confirms that the underlying Oxford Economics forecasts were produced in May 2015

⁶⁰ City of York Council (July 2016) Employment Land Review [SD064]

almost one third higher than suggested by Oxford Economics⁶¹. Retention of the earlier forecast was only justified by its stronger growth in those jobs requiring employment land (B use classes), which was seen to provide an acceptable level of ‘headroom’ when allocating land for these uses⁶². Such considerations are less relevant when considering the housing required to support job growth across all sectors, as required under the PPG. In basing its housing need on the earlier economic forecast, the Council’s assessment therefore risks underestimating the full need for housing.

- 3.38 This is compounded by the Council’s apparent stated ambition and support for delivering stronger economic growth, and its belief that ‘*local interventions such as the ‘Growth Deal’ with Government will promote faster growth in key sectors*’⁶³. L&Q Estates has previously questioned the justification for a comparatively low employment growth target in the context of these economic ambitions, which are unchanged from earlier consultations.
- 3.39 This increases the risk that the employment forecast which underpins the current OAN is underestimating the future job growth that is likely in York, and therefore the scale of housing needed to reasonably support its economic growth prospects. Any such risk would be at least partially offset by planning for a higher level of population growth, which fully reflects recent demographic trends and provides additional capacity to support further job growth. This is considered to further justify the use of the 2014-based SNPP in preference to the substantially lower 2016-based dataset that is currently favoured by the Council.

Summary

- 3.40 The commissioning of the Housing Needs Update has evidently been motivated by the release of lower, 2016-based sub-national population and household projections. While the relevant PPG generally requires ‘*the latest available information*’ to be taken into account ‘*wherever possible*’, the Government has made an exception for the 2016-based household projections due to overriding concerns about their reliability for the purposes of assessing housing need. It has confirmed that such concerns remain of relevance when examining plans submitted prior to the implementation of the revised NPPF and following the previous methodology for calculating OAN. It has explicitly sought to prevent the delays and uncertainty caused in such areas by disparities between the 2014-based and 2016-based household projections. It indicated in this context that authorities could continue to rely upon ‘*existing assessments*’ of housing need, such as the SHMA Update commissioned by the Council in 2017. The Inspectors did not appear to request consideration of the new projections, thereby calling into question the justification for the Council’s overt attempt to advance a lower level of housing need through reliance on this dataset specifically.
- 3.41 The Council has nonetheless taken the opportunity to substantially lower its OAN, from 953 to 790 dwellings per annum. The analysis in this section strongly indicates that such a reduction is not justified, because:

⁶¹ City of York Council (September 2017) Employment Land Review Update [SD063] Table 1

⁶² *Ibid*, paragraph 2.5

⁶³ City of York Council (February 2018) City of York Local Plan – Publication Draft, paragraph 1.36

- It is underpinned by a demographic projection that appears likely to underestimate future population growth.** The Housing Needs Update claims that the 2016-based SNPP is *'more robust'*, but fails to fully interrogate the assumptions that have led to projected growth being revised downwards by over one third relative to the 2014-based dataset. A change of this magnitude should not be accepted uncritically, particularly in light of the *'very strong'* demographic pressures identified only two years ago in the SHMA Update. The 2016-based SNPP allows for a very low level of population growth relative to long-term trends, with an inherent assumption that net migration will fall to a level that is largely without recent precedent. This has not occurred in the two years of its projection period to date, with evidence of a greater alignment with the 2014-based SNPP. As such, the 2014-based SNPP are considered to remain a more appropriate and *'positive'* demographic projection for York, in line with the conclusions of the SHMA Update;
- It unjustifiably blurs the adjustments needed to correct fundamental flaws in the 2016-based household projections with those required to respond to market signals.** The Housing Needs Update correctly scrutinises the 2016-based household formation rates, which have been widely viewed as unreliable and significantly influence the downgrading of projected household growth in York. It attributes greater weight to the 2014-based household formation rates, but retains the unadjusted 2016-based household projections as its *'starting point'* from which all subsequent adjustments are benchmarked. Building upon the conclusion above, it is considered that the 2014-based projections continue to provide a more reliable and appropriate demographic *'starting point'* for York, suggesting a need for *at least* 835 dwellings per annum over the period now covered by the Housing Needs Update (2012-37). This is significantly higher than the 2016-based household projections, and evidently exceeds the OAN of 790 dwellings per annum now claimed by the Council;
- Its 15% adjustment for market signals is applied to a misrepresentative demographic projection, but is agreed to be the absolute minimum necessary to respond to a continued deterioration of market conditions.** This is more pronounced than the 10% uplift recommended in the SHMA Update, due to a continued increase in house prices and a further worsening in the affordability ratio that is actually more severe than acknowledged and considerably worse than the national average. Uplifting the 2014-based household projections by 15% suggests that 966 dwellings per annum are needed in York, albeit this makes no explicit allowance for suppressed household formation and a larger uplift to around 1,000 dwellings per annum could therefore be justified within this context; and
- It is predicated upon supporting an employment forecast that has not been recently validated despite now being used as the basis to justify the OAN, with this forecast appearing to underestimate future job creation when last reviewed by the Council.** Such an approach is at odds with the Council's ambition for stronger economic growth, with a strong risk that the current OAN is therefore underestimating the job growth that will need to be serviced by a resident labour force. This is considered to further justify the use of the 2014-

based SNPP, which would provide additional capacity to support job growth in York.

- 3.42 The above strongly indicates that **an OAN in the order of 1,000 dwellings per annum is justified in York**, in line with our previous submissions on behalf of L&Q Estates. This continues to align closely with the outcome of the standard method (1,069dpa) and submissions made by other representors, which demonstrated a need for between 920 and 1,150 dwellings per annum⁶⁴.

⁶⁴ Section 3 of our “Further Review of the Objectively Assessed Need for Housing in York”, March 2018 [Appendix 1 to Gallagher Estates’ submission, reference 604] Figure 3.1

4. Size and Type of Housing Needed

- 4.1 The relevant NPPF states that local authorities should ‘*plan for a mix of housing based on current and future demographic trends*’, and identify ‘*the size, type, tenure and range of housing that is required in particular locations, reflecting local demand*’⁶⁵. It requires Strategic Housing Market Assessments to ‘*identify the scale **and mix** of housing...that the local population is likely to need over the plan period*’⁶⁶ (emphasis added).
- 4.2 The Housing Needs Update is solely concerned with the overall number of homes needed in York, and gives no consideration to the type of homes required. This was similarly omitted from the SHMA Update in 2017.
- 4.3 The latest such assessment to have been commissioned by the Council is therefore presented in the 2016 SHMA⁶⁷, albeit this relates to the 2012-based household projections and also refers to recalibrated data from the 2001 Census.
- 4.4 This can be updated to establish the implications of the 2014-based household projections, which are considered to represent an appropriate basis from which to assess housing needs in York based on the conclusions of the previous section. It can also draw upon data from the 2011 Census which shows the number of bedrooms in properties occupied by different household types in York⁶⁸. This data is summarised in the following table.

Table 4.1: Number of Bedrooms by Household Type in York (2011)

	1 bed	2 beds	3 beds	4+ beds	Total
One person household	25%	41%	28%	7%	100%
Families without children	7%	34%	40%	20%	100%
Households with dependent children	3%	22%	42%	33%	100%
Families with other adults	1%	19%	51%	28%	100%
Other households	5%	29%	28%	37%	100%

Source: Census 2011

- 4.5 The above confirms that one person households show the greatest tendency to occupy smaller homes, albeit the vast majority have at least two bedrooms and over one in three (35%) have at least three bedrooms. Families with dependent children, or families living with other adults (who may be non-dependent children), tend to live in larger homes, with over 75% of such households having at least three bedrooms. Families without children demonstrate a general tendency to occupy homes with two

⁶⁵ DCLG (2012) National Planning Policy Framework, paragraph 50

⁶⁶ *Ibid*, paragraph 159

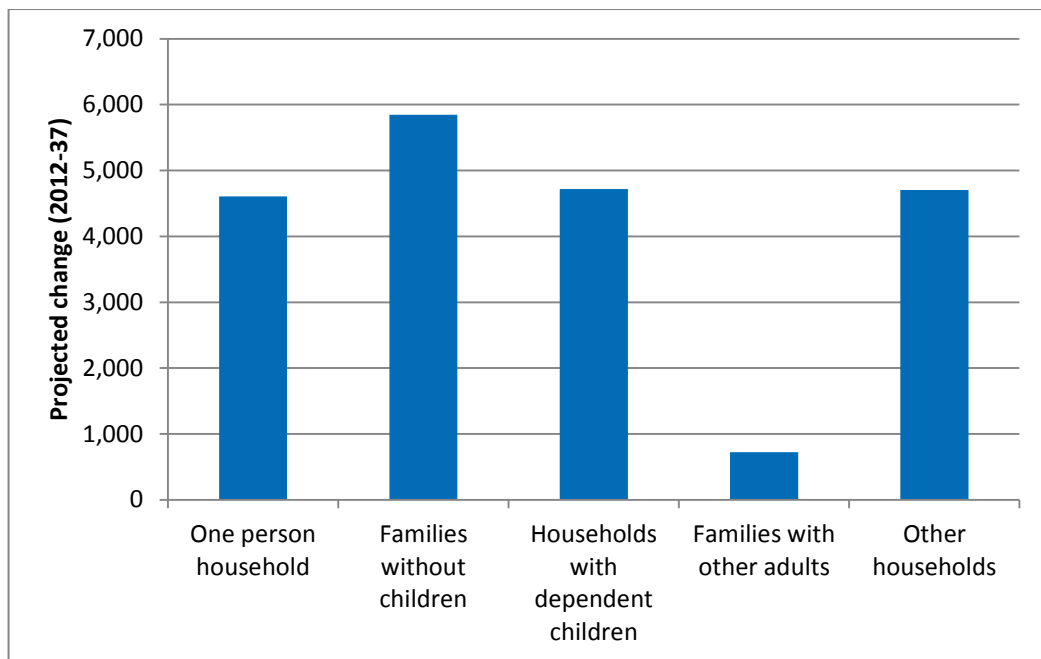
⁶⁷ GL Hearn (June 2016) City of York Council Strategic Housing Market Assessment [SD051]

⁶⁸ Census Table DC1402EW – Household composition by number of bedrooms

or three bedrooms. Other households occupy homes of different sizes, although the vast majority require at least two bedrooms.

- 4.6 Reflecting households’ tendency to occupy different sizes of home, the overall profile of household growth would be expected to influence the size of housing required in York over the plan period. As illustrated in the following chart, different types of households are projected to form over the period to 2037, with a broad level of consistency in their respective levels of growth. The exception is families with other adults, which are not expected to grow to the same extent.

Figure 4.1: Projected Change in Household Profile of York (2014-based; 2012-37)



Source: MHCLG

- 4.7 Within the context of the above, an illustrative profile of the size of housing likely to be required by additional households forming in York over the plan period can be established, by proportionately applying households’ existing tendencies to occupy different sizes of housing. Such an approach assumes that these tendencies are sustained throughout the plan period, and does not seek to estimate how market factors – such as changes to house prices, incomes and household preferences – will impact upon these occupancy patterns. Recognising market volatility over the longer term, this approach is considered reasonable to ensure that the analysis is grounded in a robust evidence-based position of household choice, and does not require unsubstantiated assumptions or predictions on future changes to household preferences.
- 4.8 The following table summarises the outcomes of this modelling, showing the proportion of *all* households that could be expected to require each size of property over the plan period. It indicates that only 9% of households will require a home with one bedroom, and suggests that 60% will require at least three bedrooms. The residual third would be expected to require two bedroom properties.

Table 4.2: Implied Size of Housing Required in York (2012-37)

	1 bed	2 beds	3 beds	4+ beds
Households requiring...	9%	31%	35%	24%

Source: Census 2011; MHCLG; Turley analysis

- 4.9 The type of property that may be needed to provide the necessary mix of unit sizes can also be estimated with reference to data from the 2011 Census, which shows how existing properties of different sizes in York are split between houses and flats⁶⁹. This suggests that circa 84% of households will require a house, with 16% requiring flats or apartments. Such a split can be simply applied to the identified need for in the order of 1,000 dwellings per annum, to suggest that circa 840 houses per annum are needed in York over the plan period.

Table 4.3: Implied Type of Housing Required in York (2012-37)

	Houses	Flats
Households requiring...	84%	16%
c.1,000 dwellings per annum	840	160

Source: Census 2011; MHCLG; Turley analysis

- 4.10 While the 2016-based household projections are not considered to provide a reliable indication of future housing need in York, it is notable that they suggest a comparable split in favour of houses in proportionate terms⁷⁰. Such a split would also be necessary to deliver the size of homes estimated as being needed across all tenures in the 2016 SHMA⁷¹.

Summary

- 4.11 This section has provided an updated assessment of the type and size of housing needed in York, drawing upon data from the 2011 Census and the 2014-based household projections.
- 4.12 Accommodating the formation of all types of households over the plan period will predominantly require larger homes, with 60% of additional households expected to require at least three bedrooms. Only 9% of households would be expected to require one bedroom, with the residual third (31%) requiring two bedrooms.

⁶⁹ Census Table CT0551 – Accommodation type (excluding caravans/temporary structures) by tenure by number of bedrooms

⁷⁰ Incorporating the 2016-based household projections indicates that 80% of households will require houses, and 20% will require flats

⁷¹ GL Hearn (June 2016) City of York Council Strategic Housing Market Assessment [SD051] Tables 55 and 56. Summing the additional households requiring market and affordable housing, and applying the split between houses and flats as outlined in this section, indicates that 78% of households will require houses, and 22% will require flats

- 4.13 Reflecting the profile of the existing stock, delivering this mix of unit sizes is likely to require 84% of new homes to be houses. Flats are expected to account for a smaller share of need, at circa 16%.
- 4.14 Within this context, L&Q Estates reserves the right to comment further on the profile of the housing land supply identified by the Council, prior to and during the relevant hearing sessions.

5. Summary and Conclusions

- 5.1 This report has been prepared by Turley on behalf of L&Q Estates to review and critique the Housing Needs Update published by the Council in January 2019. The review is undertaken in the context of the Council's ongoing consultation on proposed modifications to its submitted Local Plan, which runs until 22 July 2019.
- 5.2 Through this consultation, the Council has proposed to lower its emerging housing requirement, from 867 to 790 dwellings per annum, to precisely align with the OAN concluded in the Housing Needs Update. The housing requirement that was previously proposed by the Council failed to meet the OAN for 953 dwellings per annum that was identified through the 2017 SHMA Update. This approach was widely criticised, and the Inspectors immediately identified housing need as an area of concern.
- 5.3 While the Council committed to responding to these concerns in a timely manner, its delay in doing so created an opportunity to benefit from the release of lower, 2016-based population and household projections. Consideration of this dataset was not requested by the Inspectors and has caused further delay to hearings that were expected to have long since commenced.
- 5.4 The commissioning of the Housing Needs Update has been clearly motivated by the direction of travel in the 2016-based projections, which suggest a lower level of population and household growth than the previous dataset. While the relevant PPG generally requires '*the latest available information*' to be taken into account '*wherever possible*', the Government has made an exception for the 2016-based household projections due to overriding concerns about their reliability for the purposes of assessing housing need. It has confirmed that such concerns remain of relevance when examining plans submitted prior to the implementation of the revised NPPF, and has explicitly sought to prevent the delays and uncertainty caused in such areas by disparities between the 2014-based and 2016-based household projections. It indicated that authorities could continue to rely upon '*existing assessments*' of housing need, such as the SHMA Update commissioned by the Council in 2017. This undermines the perceived need for such a '*fundamental*' change in the evidence base at this stage of the examination process.
- 5.5 The Council has nonetheless taken the opportunity to substantially lower its OAN, from 953 to 790 dwellings per annum. This report strongly indicates that such a reduction is not justified, because:
- **It is underpinned by a demographic projection that appears likely to underestimate future population growth.** The Housing Needs Update claims that the 2016-based SNPP is '*more robust*', but fails to fully interrogate the assumptions that have led to projected growth being revised downwards by over one third relative to the 2014-based dataset. A change of this magnitude should not be accepted uncritically, particularly in light of the '*very strong*' demographic pressures identified only two years ago in the SHMA Update. The 2016-based SNPP allows for a very low level of population growth relative to long-term trends, with an inherent assumption that net migration will fall to a level that is

largely without recent precedent. This has not occurred in the two years of its projection period to date, with evidence of a greater alignment with the 2014-based SNPP. As such, the 2014-based SNPP are considered to remain a more appropriate and '*positive*' demographic projection for York, in line with the conclusions of the SHMA Update;

- **It unjustifiably blurs the adjustments needed to correct fundamental flaws in the 2016-based household projections with those required to respond to market signals.** The Housing Needs Update correctly scrutinises the 2016-based household formation rates, which have been widely viewed as unreliable and significantly influence the downgrading of projected household growth in York. It attributes greater weight to the 2014-based household formation rates, but retains the unadjusted 2016-based household projections as its '*starting point*' from which all subsequent adjustments are benchmarked. Building upon the conclusion above, it is considered that the 2014-based projections continue to provide a more reliable and appropriate demographic '*starting point*' for York, suggesting a need for *at least* 835 dwellings per annum over the period now covered by the Housing Needs Update (2012-37). This is significantly higher than the 2016-based household projections, and evidently exceeds the OAN of 790 dwellings per annum now claimed by the Council;
- **Its 15% adjustment for market signals is applied to a misrepresentative demographic projection, but is agreed to be the absolute minimum necessary to respond to a continued deterioration of market conditions.** This is more pronounced than the 10% uplift recommended in the SHMA Update, due to a continued increase in house prices and a further worsening in the affordability ratio that is actually more severe than acknowledged and considerably worse than the national average. Uplifting the 2014-based household projections by 15% suggests that 966 dwellings per annum are needed in York, albeit this makes no explicit allowance for suppressed household formation and a larger uplift to around 1,000 dwellings per annum could therefore be justified within this context; and
- **It is predicated upon supporting an employment forecast that has not been recently validated despite now being used as the basis to justify the OAN, with this forecast appearing to underestimate future job creation when last reviewed by the Council.** Such an approach is at odds with the Council's ambition for stronger economic growth, with a strong risk that the current OAN is therefore underestimating the job growth that will need to be serviced by a resident labour force. This is considered to further justify the use of the 2014-based SNPP, which would provide additional capacity to support job growth in York.

5.6 Drawing together the above, it is considered that **in the order of 1,000 dwellings per annum are needed in York** over the period from 2012 to 2037.

5.7 Additional evidence has been presented in this report to take account of the demographic evidence recommended as forming the basis for the OAN to update the analysis of the need for different types of homes, noting that the Council has not

provided such updated evidence since its 2016 SHMA. This analysis estimates that the majority of homes (c.84%) will need to be houses, with a smaller need for flats and apartments.

- 5.8 Our conclusions on the overall OAN are consistent with evidence previously submitted by Turley on behalf of L&Q Estates. It is also proportionate to the current outcome of the standard method (1,069dpa) and the alternative assessments submitted by other representors during earlier stages of consultation, which suggested that up to 1,150 dwellings per annum are needed in York.
- 5.9 Within this context, **the Council's proposal to lower its housing requirement and provide only 790 dwellings per annum is strongly challenged.** This proposed modification has not been positively prepared, but has instead been motivated by an opportunity to provide fewer homes rather than seeking to meet the full need for housing in York. The proposed level of housing provision is not justified or consistent with the requirements of national policy and guidance. It is therefore considered that the modified Local Plan, like the submitted version, is unsound.

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Land at North Field, York

Addendum to Landscape Overview of the Land at North Field York and Five Strategic Sites identified in the emerging City of York Local Plan:

Review of City of York Council Topic Paper 1: Approach to Defining the York Green Belt – Addendum (March, 2019)

Prepared by
CSA Environmental
on behalf of
L&Q Estates

Report No: CSA/2995/05

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CSA/2995/05	-	12.07.19	CA	JJ	First Issue
	A	22.07.19	JB	CA	Minor amendments to formatting



Review of City of York Council Topic Paper 1: Approach to Defining the York Green Belt – Addendum (March, 2019)

Introduction

CSA Environmental has been appointed by L&Q Estates to undertake a review of the Addendum to Topic Paper 1 prepared by York City Council. The purpose of the review is to consider the Council's approach, methodology and the relevant findings of the Council in respect of the York Green Belt.

L and Q Estates have an interest in land at North Field, York (the 'Site') which is being promoted as a potential housing allocation through the City of York Local Plan. CSA have previously prepared representations in respect of this site on landscape and Green Belt matters. This report is submitted as an addendum to the Landscape Overview of the Land at North Field York and Five Strategic Sites identified in the emerging City of York Local Plan, and should be read alongside this document.

The City of York Local Plan – Publication Draft (Regulation 19 Consultation) is currently in the process of independent examination by the Planning Inspectorate.

Background and Purpose

The general extent of the York Green Belt was established in the 'saved' policies of The Yorkshire and Humber Regional Spatial Strategy. Saved Policy YH9: Green Belts states that, *'The detailed inner boundaries of the Green Belt around York will be defined in order to establish long term development limits that safeguard the special character and setting of the historic city'*. Saved Policy Y1: York sub area policy identifies that the outer boundary of the York Green Belt is *'about 6 miles from York City Centre'*. It is therefore a function of the emerging York City Local Plan to identify the inner, and the remaining outer Green Belt Boundaries within the administrative area of the Council.

Topic Paper 1 ('TP1'): Approach to Defining York's Green Belt sets out the Council's approach to defining York's Green Belt for the first time. The Addendum to TP1 provides further information, including the methodology for defining the inner and outer Green Belt Boundaries; the exceptional circumstances which justify removal of land from the Green Belt; and the allocation of strategic sites within the general extent of the Green Belt. The purpose of the Addendum, as stated in TP1, is to establish the permanent boundaries to the York Green Belt which are capable of accommodating the planned growth and can endure for a minimum of 20 years.

The Addendum has been informed by previous Evidence Base documents which have shaped the spatial strategy for the City of York as set out in the draft Local Plan, and identified on the draft Proposals Maps. Given the advanced stage of the Local Plan and the strategic allocations, the Addendum does not comprise a comprehensive review of the York Green Belt; rather its purpose is to provide further justification for the existing spatial strategy / Green Belt approach.

Approach

Section 4 of the Addendum sets out the Council's strategic approach to defining land which needs to be kept permanently open, in terms of the five National Green Belt purposes. It notes that saved local and regional policy establishes the principal that the primary purpose of the York Green Belt is preserving the setting and special character of the historic City of York (National Green Belt Purpose 4). However it also notes that, whilst prioritising this purpose, both the Preferred Options Local Plan and the Sustainability Appraisal concluded that some weight should be attributed to the other Green Belt Purposes. In fact, it states that land which serves more than one Green Belt purpose will be held to have additional weight.

To date, whilst the Council have produced a number of evidence base documents concerned with the historic setting and character of York, no comprehensive Green Belt Review has been undertaken against each of the National Green Belt purposes. Section 4 of the Addendum to TP1 therefore seeks to clarify how the approach and evidence documents relate to the five Green Belt purposes. The Addendum provides mapping which demonstrate how the Green Belt performs against each of the Green Belt purposes (with the exception of purpose 5). Purpose 5 is discounted from this assessment as it is generally accepted that all Green Belt parcels perform this function equally. Each of the Green Belt purposes covered in the Addendum are described below.

Purpose 4: To preserve the setting and special character of historic towns

The Addendum highlights the previous work undertaken in the Approach to the Green Belt Assessment (2003) and subsequent historic character and setting updates (2011 and 2013). This identifies the land which is considered most important to the character and setting of the City of York.

Purpose 1: To check the unrestricted sprawl of large built up areas

This section sets out the Council's approach to assessing the contribution the Green Belt plays in preventing urban sprawl from the City of York. The

Addendum states that the NPPF identifies that Local Authorities when reviewing Green Belt Boundaries should seek to promote sustainable patterns of development. The Addendum notes that planned development in this manner would not constitute sprawl.

The Addendum states that the Local Plan spatial strategy has sought to ensure new development is well related to the main built up areas, so that it is located in the most sustainable locations, and thus preventing sprawl. The mapping at Figure 4: Access to Services identifies all land within the Green Belt which is outside 800metres of at least two services.

Sustainability criteria are undoubtedly an important consideration which should be factored into a comprehensive Green Belt review, and these factors should inform the spatial strategy for the City of York. Despite this, the degree to which a land parcel prevents urban sprawl can not be judged on sustainability criteria alone. Factors such as relationship to the existing urban edge, visual containment from the wider countryside and the presence of logical, alternative Green Belt boundaries should all be factors which form part of a robust assessment of this purpose. In the absence of a comprehensive Green Belt Review these factors have clearly not been considered.

In addition, the criteria used to establish the sustainability of land are crude. This approach inevitably directs growth to the edge of urban / built up areas, but it does not provide any indication to the degree which a parcel is sustainable. It would be a reasonable assumption that land on the urban edge of York is more sustainable than land adjacent to one of the smaller settlements which has a minimum of two services.

Purpose 2: To prevent neighbouring towns merging into one another

The approach recognises that there are no towns in the vicinity of York which the current extent of the Green Belt prevents from merging with the City. To this end the York Green Belt plays no role in meeting this purpose specifically. However, the Addendum acknowledges that the Planning Advisory Service ('PAS') in its guidance entitled The Big Issues – Green Belt (2015), recognises the role that Green Belt plays in maintaining the setting and settlement pattern within it. To this end, the Addendum recognises the relationship between York and the surrounding smaller settlements. However, in strict Green Belt terms this should be afforded less weight as the purpose is specific to the merging of towns, as opposed to the merging of the city with smaller settlements.

Purpose 3: To assist in safeguarding the countryside from encroachment

The approach set out in the Addendum states that the Local Plan evidence base recognises the role that York's natural assets play in informing the character and setting of York; and that the spatial strategy uses these factors to shape how development is accommodated. To that end, it identifies those uses considered acceptable within the Green Belt and which are therefore the most important to keep permanently open. These include nature conservation sites, existing open space, green infrastructure corridors and Ancient Woodland.

Whilst these factors are all important contributory factors to the spatial strategy for the City of York, they are not specifically considerations which should in their own right determine the functioning of a specific Green Belt parcel against this purpose. Figure 6 illustrates that much of the land which falls with one of these areas lies some distance from the edge of York. By following this approach, this would suggest that the majority of land at the edge of York plays no role in meeting this purpose. This is clearly not the case.

More relevant would be the approach set out in the PAS guidance (and referenced in the Addendum), which considers *'the difference between urban fringe land – land under the influence of the urban area – and open countryside, and to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved'*. In considering the degree to which a land parcel performs this purpose, an assessment should consider its existing land-use, its relationship to the wider landscape and the degree to which it is influenced by the adjoining urban area. The presence of existing boundary features or the scope to provide mitigation as part of a planned extension should also be considered.

The Addendum, and the existing evidence base therefore lack any robust assessment of the function of the land parcels at the edge of the City of York and their performance against this Green Belt Purpose.

Overall Strategic Areas to Keep Permanently Open

Figure 7 of the Addendum combines the mapping from the previous assessment against the first four Green Belt purposes, to identify strategic areas to keep permanently open.

This approach is clearly limited and has not been informed by a robust review of the York Green Belt against the NPPF Green Belt purposes. The existing evidence base is weighted towards character and setting criteria in respect of the historic City of York. Whilst this is identified as the primary purpose of the

York Green Belt, no proper assessment of the other Green Belt purposes has been undertaken. In addition, the use of limited sustainability criteria to discount large tracts of land particularly beyond 800 metres from the edge of York is misleading and does not provide a comprehensive assessment of the degree to which land parcels meet sustainability criteria.

Methodology

Section 5 of the Addendum sets out the methodology for determining the York Green Belt boundaries. This review is only concerned with the methodology adopted for determining the Inner Green Belt Boundary.

A review of Green Belt boundaries would normally accompany a comprehensive Green Belt Review. In this case, the purpose is to establish the existing Green Belt boundary in the first instance, without taking into account the exceptional circumstances and the requirement for strategic growth within the City of York. This approach is counter intuitive, a review of Green Belt boundaries should form part of the spatial strategy and should be undertaken in light of the exceptional circumstances required to justify release of land from the Green Belt. As the Addendum states; *'The key role of the inner Green Belt boundary is to establish long term development limits to the built up area, and to distinguish land which needs to be kept permanently open to meet the Green Belt purposes, including safeguarding the special character of the historic city.'* On this basis, any review of the Green Belt boundaries must form part of a wider Green Belt Review which clearly identifies land parcels and assesses their performance against the Green Belt purposes, and other sustainability factors.

The Addendum divides the periphery of York into eight sections as illustrated on Figure 15. These sections are further sub-divided into shorter stretches in order to consider the inner boundary in more detail.

Two criteria are used to define the inner Green Belt boundaries: openness (strategic and local); and permanence.

In terms of strategic openness, the assessment relies on the tracts of land identified as strategic areas to be kept permanently open. As set out above, this approach is flawed and is not based on a robust assessment of the functioning of the Green Belt against NPPF Purposes.

In terms of assessing local openness the Addendum identifies a number of localised factors which should be considered, including local historic assets and protecting land which is open and serves a countryside function. These factors are relevant when assessing the performance of individual land parcels

against the Green Belt purposes. Setting aside the fact that the spatial strategy is already established, it is unclear from the methodology how these openness criteria have been used to establish which land parcels need to remain permanently open in Green Belt terms.

All Green Belt is essentially open land and therefore already performs this function. It is the degree to which this openness contributes to the performance of the Green Belt purposes which is the fundamental issue. The methodology does identify a number of strategic and local considerations which should form part of a review of the performance of Green Belt, however it is unclear how each of these factors have been used to assess the performance of the Green Belt against each of the purposes. For instance there is no clear method to determine which aspects contribute to which Green Belt purpose and what weight should be attributed to each of these factors. For instance, the presence of Listed Buildings, a Conservation Area, or a historic field pattern are not in themselves Green Belt matters, although they may contribute in some way to the historic setting of York. There is no analysis of how these factors have been used to inform judgements.

Criteria 2b (land serving a countryside function or the boundary between urban and rural environments) alludes to Purposes 1 and 3 of the Green Belt. Again, as all land within the Green Belt is essentially open, it will all perform this criteria to varying degrees. The purpose of a Green Belt review is to establish which land plays less of a role in preventing encroachment on the countryside or sprawl, and could therefore be released from the Green Belt for sustainable development. Factors such as the relationship to the existing urban edge, the condition / permanence of existing boundaries, and the presence of alternative boundaries are all considerations which would normally be included in a review.

Furthermore, there is no clear definition of what constitutes a high performing Green Belt parcel in respect of each purpose. Or, for that matter, how judgements about the performance of each purpose have been combined to inform an overall judgement about an area of land. As set out in paragraph 5.41:

'..the land which needs to be kept permanently open is firstly that which contributes to the special character and setting of the historic city and its clock face of settlements (including by preventing the coalescence of settlements or areas), as well as those which act to prevent sprawl, and those areas which we can identify as performing a countryside function and therefore requiring defence from encroachment.'

This would suggest that the boundary assessment relies largely on the strategic analysis to inform any judgements and there is no indication how the assessment of local openness criteria has informed judgements.

The Addendum considers the permanence of the Green Belt boundary. The NPPF is explicit that Green Belt boundaries need to be defined clearly '*...using physical features that are readily recognisable and likely to be permanent*'. At a strategic level the Addendum states that the submitted Local Plan identifies sufficient housing land to ensure that the Green Belt boundary can endure beyond the Plan period.

In terms of local permanence, the Addendum sets out the aim to establish clear, recognisable boundaries which are likely to be permanent. At paragraph 5.69 it notes that hard landscaping and major infrastructure can be argued to provide more permanent features, however it states that natural features which have been long established, also offer a type of permanence. The Addendum therefore confirms that the strongest (i.e. most permanent) boundaries are those defined by infrastructure or long established natural features (assumed to be woodland, watercourses etc.). At paragraph 5.70 the methodology states that where possible, boundaries should follow a continuous 'regular' or consistent line, as irregular or 'softer' boundaries are more vulnerable to misinterpretation and erosion. At paragraph 5.71 the methodology notes the role Green Belt boundaries play in providing a distinction between the urban and rural environment, and that a clearly identifiable urban edge can also form an acceptable Green Belt boundary. It does not define what a clearly identifiable urban edge is, however it should be assumed that rear garden boundaries would provide a weaker edge than a highway or an established tree line, for example.

Annex 3: York Green belt Inner Boundary Section Descriptions and Justifications

The following section considers the inner boundary definition in respect of the land at North Field, York. The land at North Field (the 'Site') lies west of Section 2 of the Inner Green Belt boundary.

The Annex contains a plan which shows the extent of section 2 of the Inner Boundary. The land at North Field lies adjacent to sub-sections 4 – 10. This plan shows that the Site lies within an area which protects special character and setting (including coalescence) and, based on the Council's strategic approach, outside areas preventing sprawl and protecting the countryside.

Annex 3 contains an assessment of the openness of this part of the Green Belt and the permanence of the proposed inner boundary. As the characteristics of this boundary are fairly consistent much of the commentary is duplicated

with the assessment of each sub-section. The following section considers the Council's assessment of openness and permanence in respect of the land at North Field and the proposed Green Belt boundary.

Openess

At a strategic level, North Field lies within an Area identified in the 2003 Green Belt Appraisal (and subsequent updates) as an 'Area Retaining Rural Setting', with the southern part being an 'Area preventing Coalescence' between York and Knapton.

In terms of Local Openess the assessment identifies a number of characteristics which are relevant to the Site at North Field. These are set out below and considered individually :

The southern fields adjacent to section 4 of the boundary are probable strip fields dating from the medieval period.

This area lies to the south of Knapton and along the route of Ten Thorn Lane. It has a more intact landscape structure than the land further north and plays a role in maintaining separation between Knapton and York. Should development come forward at North Field it is the intention that this area would be retained as open land.

The land at North Field is described as one large, modern, improved field defined externally by regular hedges, and has lost its internal field boundaries.

As noted in the annex, North Field comprises a large, area of relatively featureless farmland. Former, historic field patterns are absent as a result of field amalgamation and the historic character / associations have been eroded. To the east, the adjacent housing area is conspicuous and largely uncontained by any robust boundary features, such that it exerts an urbanising influence on the adjacent farmland.

The flat open landscape has been used by the populations of York for its arable value and intensively farmed for cereal crops and market gardening.

This is almost certainly the case, and would also be true of much of the farmland both within the York Ring Road and beyond. This does not have any relevance to Green Belt.

Human Influences have damaged the historic context with the introduction of the ring road and building housing in large estates which have a tenuous link to the city and its history

As noted in the annex, the ring road and the large scale residential development in Acomb have severed any connection between this land parcel and the historic centre of York.

Flat low lying land make this a prominent edge to York's urban area

The existing urban edge, which comprises modern estate housing, does present a rather stark edge to this part of York, particularly when viewed from the A1237.

Structures can be seen against the skyline (which holds York Minster in its context) and changes can have an impact on local views from the ring road and key strategic views.

This statement is misleading. There are no views across the land west of this boundary to the historic core of York. In addition there are no Key Historic Core Views as identified in the York Central Historic Core Conservation Appraisal which contain the land to the west of this boundary.

Dense planting to screen changes would not be appropriate as it is not a traditional feature of the landscape.

The Site lies within the Flat Open arable Farmland Landscape Type as identified in the York Landscape Appraisal (1997). This is a largely, open, arable landscape, however one of the management guidelines set out in the Appraisal states:

'Plant deciduous woodland either as an extension to, or linking to existing woodland, or plant new small blocks of woodland within the open countryside.'

Woodland is not a common feature within the wider landscape, however it is not entirely alien and could be accommodated as part of the open space design alongside the A1237 road corridor to provide an appropriate setting for expansion on this edge of York.

Retains the physical separation between Knapton, Upper Poppleton and Nether Poppleton

The land to the south of this parcel does perform a function in maintaining separation and the separate identity of Knapton. Whilst Knapton is not a town, this area of farmland does contribute to the second Green Belt purpose, namely to prevent York merging with Knapton. The northern part of the parcel does not perform this function to the same extent.

The settlements at Upper Poppleton and Nether Poppleton lie beyond the A1237 and the land parcel does not play an important role in maintaining separation between these areas and York.

The eastern boundary forms the clearly identifiable built up extent of York urban area which is in stark contrast to the open land to the west which is in agricultural use. The farmland separates the edge of York and the ring road enabling a compact concentric farm to be created within the ring road.

The adjacent land parcel does have an open character, however the existing edge is poorly assimilated and the A1237 would provide a much more robust alternative boundary. Planned expansion could maintain a buffer to the ring road and provide a much better edge to York.

York has expanded significantly within the suburb of Acomb in the twentieth century, and this separates the ring road from the historic parts of York. There is little inter-visibility between the ring road and the historic core at this point and the perception of a concentric city is largely absent.

The Council's assessment of local openness concludes that the land at North Field contributes to checking the unrestricted sprawl of large built up areas, and to preserving the setting and special character of York. This conclusion however is not supported by a robust assessment of this parcel in Green Belt terms. The following points are relevant:

- It acknowledges that the land at North Field comprises an area of modern improved fields which is bordered by large housing estates which have a tenuous link to the city and its history. This area has lost much of its historic field structure;
- This land is influenced by the prominent urban edge to the east, which as the assessment states, lends this area a semi-rural character;
- The assessment does not consider the A1237 as a more robust alternative boundary to the edge of York. This would contain development and prevent sprawl. This would represent a strong boundary in line with guidance set out in the Council's own addendum;
- There are no Key Historic Core Views which cross this land parcel, and given the separation between this land parcel and the historic core by modern estate development, it plays a limited role in the setting and special character of the city; and
- Expansion in this direction can maintain a buffer to Knapton maintaining its separate identity and preventing coalescence with York.

Permanence

The assessment notes that the proposed boundary follows an historic field boundary which forms a distinct edge between the urban area and more open farmland. In fact, this boundary largely follows the rear gardens of housing at the edge of York. This does not meet the criteria of a robust man-made or natural feature. The A1237 would provide a much more logical and permanent edge to the Green Belt at this point, however this does not appear to have been considered.

Annex 5: Sites Proposed in the General Extent of the York Green Belt

CSA have previously undertaken a landscape overview of five Strategic Sites identified in the submitted City of York Local Plan. The follow section briefly considers the findings of Annex 5 of the Addendum which assesses the performance of each of the sites against the first four Green Belt purposes. The following sites were considered:

- *ST7 – East of Metcalfe Lane;*
- *ST8 – Land North of Monks Cross;*
- *ST9 – Land North of Haxby;*
- *ST14 – Land North of Clifton Moor; and*
- *ST15 – Land to the West of Elvington Road.*

ST7 – East of Metcalfe Lane

This area is identified for a standalone settlement of approximately 845 new homes located a short distance to the east of York. In terms of sustainability, it is located beyond the zone with access to a minimum of two existing services and will be reliant on provision of its own infrastructure to support a new community.

Given its close proximity to York, approximately 160m from the existing edge, development in this location will read as extension to the existing built area, and given the absence of robust man-made or natural boundaries it will result in a significant expansion into the countryside resulting in encroachment and sprawl.

In addition, the Heritage Impact Appraisal identifies that it is prominent in views from the A64 and development will also impact on a Key City Wide View towards the historic core of York. It will therefore impact on the setting and special character of York.

The Council's appraisal identifies that the proposals will result in minor harm to the purpose of checking unrestricted sprawl. However, given its location close

to the edge of York and its visibility from the A64, it will result in a significant extension to the built edge of York. The appraisal notes that there could be minor / significant harm as a result of encroachment on the countryside and the setting and special character of York. It adds that these effects can be reduced to minor through mitigation, however it does not qualify this. In our view, development in this location could have a significant impact on three of the four Green Belt purposes assessed.

ST8 – Land North of Monks Cross

The proposal will result in an urban extension to the east of York. The annex notes that development would result in minor harm to a number of Green Belt purposes. It is separated from the existing edge of the city by a number of small fields which restrict integration. The site does benefit from reasonably strong boundaries in the form of surrounding minor road infrastructure. The existing residential edge is well contained; however development will be more prominent in views from the surrounding highways, resulting in some impression of sprawl and encroachment into the countryside. The Heritage Impact Assessment identifies a view to the Minster from within the Site and the loss of farmland will have some impact on the setting of York.

ST9 – Land North of Haxby

The Council's appraisal identifies that development in this location will result in minor harm to purposes 1, 3 and 4 of the Green Belt. Our own assessment identified that expansion to the north of Haxby will extend development into open countryside on the edge of the village. Development will be visible from the surrounding lanes which border the draft allocation result in significant encroachment into the wider farmland. In addition, the existing edge of Haxby is well contained and there will be some sense of sprawl of the main built up area. Development would therefore impact on two of the Green Belt purposes.

ST14 – Land North of Clifton Moor

The Heritage Impact Assessment identifies that there are potentially significant negative impacts from urban sprawl as development would extend beyond the ring road. This would, it notes, be mitigated by landscape buffers and strategic green space to the west. It also notes the potential to create an urban corridor due to its location opposite Clifton Moor Retail Park and potential harm to the setting of Skelton.

The Council's appraisal identifies that development in this location would cause minor harm to purposes 1, 3 and 4 and no significant harm to purpose 2.

The proposed allocation is for a free standing settlement north of the A1237. In sustainability terms it will need to provide its own infrastructure and services to serve the new community. In our view, the Site is located some distance north of existing highway infrastructure and significant new road connections will be required to link it to the surrounding area.

The Site is located with open countryside beyond the ring road and in proximity to the northern edge of York and neighbouring Skelton. It is contained to the east by a tract of woodland but elsewhere the boundaries are less well defined. Given its proximity to other settlement, development will result in the cumulative urbanisation along the route of the A1237, and the perception of York expanding northwards beyond the ring road. It will also impact on the separation between York and Skelton. Development in this location will therefore result in countryside encroachment, sprawl and loss of separation between York and its outlying settlements and will be contrary to three Green Belt purposes.

ST15 – Land to the West of Elvington Road

The proposals are for a new large free standing settlement of around 3,339 new homes. The Site is remote from the edge of York and significant highway infrastructure and services. Access is proposed from a new junction off the A64, however this is some distance from the proposed allocation.

The scale of development will inevitably result in a significant encroachment into the countryside within the Green Belt. In addition, the provision of a new access off the A64 and the extent of the proposed development could give rise to some sense of York expanding into the rural hinterland beyond the ring road, although the proposals are some distance from the edge of York. Development will therefore result in significant harm to one Green Belt purpose, namely countryside encroachment, and less harm to the other Green Belt purposes. This assessment is broadly consistent with the Council's findings.

Conclusion

This document provides a review of Addendum to Topic Paper 1: Approach to Defining York's Green Belt prepared by York City Council. It considers the Council's approach, methodology and the relevant findings of the Council in respect of the York Green Belt. It has been undertaken on behalf of L and Q Estates who are promoting land at North Field, York, as a potential urban extension to the city.

This report provides an addendum to work originally undertaken by CSA in October 2017, '*Landscape Overview of the Land at North Field York and Five Strategic Sites identified in the emerging City of York Local Plan*'.

Topic Paper 1 ('TP1'): Approach to Defining York's Green Belt sets out the Council's approach to defining York's Green Belt for the first time. The Addendum has been informed by previous Evidence Base documents which have shaped the spatial strategy for the City of York as set out in the draft Local Plan, and identified on the draft Proposals Maps. Given the advanced stage of the Local Plan and the strategic allocations, the Addendum does not comprise a comprehensive review of the York Green Belt; rather its purpose is to provide further justification for the existing spatial strategy / Green Belt approach.

It is apparent that the previous York Green Belt evidence base has been heavily weighted towards character and setting criteria in respect of the historic City of York. The Addendum to TP1 seeks to undertake a retrospective review of Green Belt land against all the National Green Belt purposes in order to establish the boundaries to the Green Belt.

This review found that this approach is essentially flawed and the methodology is confused.

Annex 3 of the Addendum contains an assessment of the inner Green Belt boundary. The land at North Field lies alongside section 2 of this boundary. The Council's assessment of local openness concludes that the land at North Field contributes to checking the unrestricted sprawl of large built up areas, and to preserving the setting and special character of York. This is largely due to the work undertaken in the 2003 Green Belt Appraisal (and subsequent updates) which identified this land parcel as an 'Area Retaining Rural Setting', with the southern part an 'Area preventing Coalescence' between York and Knapton. However, a review of the local openness assessment undertaken by the Council finds a number of discrepancies between these conclusions and some of the commentary set out in the assessment, and in deed is not supported by our own findings. In our view, further work should be undertaken to provide a

robust assessment of of the Green Belt boundary in this location, and the potential to release land at North Field from the Green Belt.

Annex 5 of the Addendum contains an assessment of the Strategic sites which are identified in the submitted Local Plan. CSA previously commented on 5 strategic sites as part of previous representations to the Council.

Our analysis of the five Sites identified that development at ST7: East of Metcalfe Lane would result in significant harm to three of the four Green Belt purposes. Similarly, ST14 – Land North of Clifton Moor contributes to three Green Belt purposes. ST9: Land at Haxby performs strongly against 2 of the 4 Green Belt purposes. Given the scale of development proposed at ST15 – Land West of Elvington this will inevitably result in significant encroachment into the countryside. To a lesser extent, ST8 – Land north of Monks Cross plays some role in preventing urban sprawl and countryside encroachment.

On this basis, in our view the Council has not established that in a number of cases, release of these sites will not result in significant harm to the Green Belt purposes.



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From: Grundy, Simon [Simon.Grundy@carterjonas.co.uk]
Sent: 22 July 2019 13:57
To: localplan@york.gov.uk
Subject: RE: City of York Local Plan – Proposed Modifications consultation – response on behalf of Picton Capital [CJ-WORKSITE.FID414879]
Attachments: Appendix 2 - 190719 - City of York OAN - Housing Needs & Supply.pdf
Follow Up Flag: Follow up
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Please find enclosed Appendix 2 of the representations under the email below I sent.

Simon Grundy
 Partner

Carter Jonas

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• Please consider the environment. Do you really need to print this email?

From: Grundy, Simon
Sent: 22 July 2019 13:50
To: localplan@york.gov.uk
Subject: City of York Local Plan – Proposed Modifications consultation – response on behalf of Picton Capital [CJ-WORKSITE.FID414879]

Further to the above, please find enclosed completed response form and associated representations statement and appendices.

I look forward to receiving acknowledgement of receipt.

With best wishes,

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**CITY OF YORK LOCAL PLAN
CONSULTATION ON 'PROPOSED MODIFICATIONS'**

HOUSING NEEDS AND SUPPLY REPORT

JULY 2019

Carter Jonas

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1.0 INTRODUCTION & EXECUTIVE SUMMARY

- 1.1 This report is submitted in relation to the proposed modification of the City of York Local Plan (“the plan”). City of York Council (“the Council”) has released a range of proposed modification one of which is to seek to reduce the Objectively Assessed Housing Need (OAHN) figure to 790 dwellings per annum.
- 1.2 In undertaking this assessment of objectively assessed need and associated issues, Carter Jonas LLP is instructed by various clients.
- 1.3 This report is in the context of continued review and updating of housing evidence on behalf of the Council from 2016 (and before) through 2017, and again in 2019. As such, it tracks the headlines in those reviews and updates. This tracking reveals that there has been under reporting and suppression of the housing needs.
- 1.4 It is recognised that the plan was submitted in May 2018 – under the 2012 National Planning Policy Framework (NPPF) – but there were strong indications of changes to national policy prior to this. Furthermore, the correspondence between the Inspectors and the Council makes it clear that we are in a changing and dynamic policy position and this latest consultation is being conducted post the publication of a new revised NPPF and supporting practice guidance in 2019.
- 1.5 There is an inherent conflict in the Council’s approach to attempt to use the most up-to-date data, but not the most recent national policy and guidance. The flaws in the SHMA and the tensions created by the Council’s approach can all be disregarded if the SHMA is set aside in preference for the ‘Standard Methodology’ for identifying housing need.
- 1.6 Notwithstanding this, should the Inspectors consider it reasonable to retain a SHMA based OAHN figure in the Local Plan it is respectfully suggested that the 2017 update and the GL Hearn conclusion that includes a 10% uplift to reflect market signals and engage with acute Affordable Housing need should be used as the starting point. This would ensure an OAHN of at least 953 dpa is included in the Local Plan. It is considered, however, that this is still under reporting the needs in the City of York.
- 1.7 The housing need figure should be a **minimum** of 1,066 dpa and the most appropriate figure is likely to be **1,226 dpa** to engage with the significant and acute need for Affordable Housing in York.

2.0 EVOLUTION OF THE CITY OF YORK STRATEGIC HOUSING MARKET ASSESSMENT

2.1 The submitted City of York Local Plan was supported by three assessments of housing need all produced on behalf of the Council by GL Hearn:

- City of York Strategic Housing Market Assessment (SHMA): (June 2016) – Examination reference: SD051;
- City of York SHMA Addendum (June 2016): Examination reference: SD052; and,
- City of York SHMA Update (2017): Examination reference: SD050.

2.2 Subsequently, the Council has published a further ‘Housing Needs Assessment Update’ again produced by GL Hearn in January 2019.

The SHMA (June 2016)

2.3 The SHMA (June 2016) Identified:

- A demographic baseline projected need of 833 dwellings per annum (dpa);
- An economic growth assessment to support 780-814 dpa;
- An affordable housing need of 573dpa (although no uplift was applied); and,
- A modest adjustment for household formation rates in the 25-34 age group.

2.4 The conclusion was that the Objectively Assessed Housing Need amounted to: 841 dpa (over the period 2012 – 2032)

The SHMA Addendum (June 2016)

2.5 The SHMA Addendum (June 2016) updated the ‘full’ SHMA in response to the publication of new demographic data: The 2014 based household projections. This iteration of the SHMA identified:

- An increased demographic baseline projected need of 889 dpa;
- No further assessments were made for economic growth;
- An increased affordable housing need of 627dpa (although no uplift was applied); and,
- A retention of the modest adjustment for household formation rates in the 25-34 age group.

2.6 The conclusion was that the Objectively Assessed Housing Need (OAHN) did not need to change from the 841 dpa (over the period 2012 – 2032).

2.7 Pausing at this stage, it is reasonable to reflect on the fact that the 2014 household projections published by the Department for Communities and Local Government show that the figures for the period 2012 – 2032 are 84,271 to 101,389 dwellings, or 856 per year, and this projection figure is higher than that identified as the OAHN for the City of York.

2.8 Furthermore, in order to meet the affordable housing needs in full (as a policy compliant ‘maximum’ of 30%) a total annual figure of 1,910 or 2,090 dwellings would be necessary, respectively, for each SHMA iteration. Therefore to conclude that no uplift was necessary to attempt, or go ‘some way,’ to meeting affordable housing needs is surprising at least, if not unsound.

- 2.9 The purpose of this report is not to analyse the 2016 versions of the SHMA in detail. However, the two observations above are sufficient to raise some concerns about the inputs and assumptions contained within them and, critically the conclusion drawn that 841 dpa is in fact a robust OAHN.

The SHMA Update (2017)

- 2.10 Turning to the City of York SHMA Update (2017), this identified that the latest mid-year population projections had – once again – increased the baseline demographic needs. The 2017 iteration of the SHMA also concluded that there was a need for an uplift in the housing needs figures to reflect the acute need for Affordable Houses. Reported at paragraphs 5.6 and 5.7 is the following:

“In response to both market signals and affordable housing need we have advocated a 10% uplift to the OAN. In line with the PPG this was set against the official starting point of 867dpa. The resultant housing need would therefore be 953dpa for the 2012-32 period.

“The level of housing need identified is somewhat higher than the previous SHMA reflecting the increased starting point but also the inclusion of a market signals uplift. This OAN would meet the demographic growth in the City as well as meet the needs of the local economy.”

- 2.11 However, the council added a preface to this report which stated:

“Members of the Council’s Executive at the meeting on 13th July 2017 resolved that on the basis of the housing analysis set out in paragraphs 82 - 92 of the Executive Report, the increased figure of 867 dwellings per annum, based on the latest revised sub national population and household projections published by the Office for National Statistics and the Department of Communities and Local Government, be accepted.

“Executive also resolved that the recommendation prepared by GL Hearn in the draft Strategic Housing Market Assessment, to apply a further 10% to the above figure for market signals (to 953 dwellings per annum), is not accepted on the basis that Hearn’s conclusions were speculative and arbitrary, rely too heavily on recent short-term unrepresentative trends and attach little or no weight to the special character and setting of York and other environmental considerations.”

- 2.12 Observations of the conclusions in the SHMA include:

- First, that there is an apparent conflation of ‘market signals’ and ‘affordable housing’ to create a suggested uplift of 10%. The now superseded planning practice guidance suggested that this was a two-step and sequential process, albeit each element was a matter of judgement, so to combine the two considerations would not conform to the guidance.
- Second, the 2107 SHMA update reported (para. 3.17) the calculation of affordable housing need (573 dpa) against the proposed policy proportion of 30% requiring a plan target of 1,910 dwellings a year. Whilst it was correctly noted that there is no requirement to meet all of this need a 10% uplift to meet a significant challenge is derisory at best. The figure of 573 is 66% of the demographic baseline figure of 867 and moreover, there is no mention of the

increased Affordable Housing need identified in the 2016 addendum of 627 dpa.

- Third, it is surprising that it took three iterations of the SHMA (not including any previous versions created by 'Arup') to conclude that an uplift to engage with the challenge of affordable housing was necessary, but it is positive to see this assessment within the evidence base.

- 2.13 The Council Executive's response, however, to the SHMA 2017 is disappointing. The particular concern is the attempt to place a 'policy-on' assessment on the OAHN through the comment that the conclusions "*attach little or no weight to the special character and setting of York and other environmental considerations.*" It was not in the gift of the Council to make this decision as part of setting of objectively assessed needs, clearly this should have been part of the plan making exercise.
- 2.14 It is in the context of the SHMA published in 2016; its two 'updates' and, the council's response to them, that we must now consider the latest iteration of housing needs assessment.

3.0 HOUSING NEEDS ASSESSMENT UPDATE JANUARY 2019

- 3.1 At the beginning of 2019 the Council published a further update to its housing needs assessments. The purpose of this report was to support the submitted plan and its use of the 'latest' evidence, including the use of 2016 base population projections.
- 3.2 The plan was submitted under the 2012 version of the National Planning Policy Framework (NPPF). Therefore the relevant guidance to consider, in the first instance, is that associated with the first version of the NPPF. The now archived National Planning Practice Guidance (PPG) advised that Objectively Assessed Housing Need (OAHN) should be:
- a) Unconstrained (ID 2a-004-20140306); and,
 - b) Assessed in relation to the relevant functional area known as the Housing Market Area (HMA) (ID 2a-008-20140306).
- 3.3 Regarding point a), there appears to be no attempt to constrain the OAHN in this iteration of the SHMA. This is unlike the 2017 update, as reported above. The HMA (point b) is not changed from the original drafts of the SHMA so it is assumed that this is still relevant and appropriate.
- 3.4 The PPG methodology to identify the OAHN figure is a four stage process comprising:
- I. Demographic (based on past population change and Household Formation Rates (HFR)) (ID 2a-014-20140306 to 2a-017-20140306) ;
 - II. Economic (in order to accommodate and not jeopardise future job growth) (ID 2a-018-20140306) ;
 - III. Market signals (to counter-act worsening affordability caused by undersupply relative to demand) (ID 2a-019-20140306 & 2a-020-20140306).
 - IV. Whilst affordable housing need is separately assessed (ID 2a-022-20140306 to 2a-028-20140306). The delivery of affordable housing can be a consideration for increasing planned housing provision (ID 2a-029-20140306).
- 3.5 As mentioned above, the demographic baseline for the 2019 update is the 2016 based population projections. This results in a 'baseline' growth of 484 dpa. The economic growth assessment suggests a need for 790 dpa. Finally, the 'market signals' and 'affordable housing need' assessment suggests an uplift of 15% to 557 dpa.
- 3.6 The conclusion drawn is that 790 dpa is the most appropriate OAHN figure.

Use of 2016 Sub National Population Projections

- 3.7 As is explored in section 4.0 hereunder, Government's intention has long been to see the delivery of 300,000 new homes a year across the country by the mid-2020s. As part of this commitment it was signposted that a 'streamlined' approach to understanding housing need would be introduced: the 'Standard Methodology' and that the changes to demographic modelling and projections would mean that the use of the 2016 based numbers would not allow the Government to reach its target.
- 3.8 It is accepted that the plan was submitted under the 2012 NPPF but significant time has elapsed since then and indeed, the current consultation is being conducted against the backdrop of a revised and further reviewed NPPF in 2018 and 2019, with associated PPG also updated. It is therefore suggested that the baseline should be the 2014 based population projections and also that the standard methodology

should be adopted. The standard methodology is considered in more detail at section 6.0 of this report.

Economic uplift

- 3.9 The economic assessments presented in the 2019 update rely on the reports and conclusions drawn from documents drafted and published in 2016 and 2017. Whilst these assessments appear to be reasonably robust it is a concern that there has been no attempt to update the conclusions. It is difficult to fully assess the impacts of housing needs that are presented against demographic projections published two years after the associated job growth assessments. It is therefore suggested that, if the SHMA is to continue to be used as the evidence to underpin the City of York Local Plan that an associated update to economic need is undertaken.

Affordable housing need uplift

- 3.10 The Affordable Housing need has not been reassessed since the publication of the SHMA in 2016. The figure of 573 dpa is reapplied to the 2019 calculation update. There is no mention of the 627 dpa identified in the 2016 SHMA addendum. The same under appreciation of the scale of the challenge is applied to the OAHN figures in this latest iteration of the SHMA as with the version in 2017. Against a potential admittedly ‘theoretical’ need for 1,910 dpa a 15% uplift to only 557 dpa is suggested. This will not go far enough to either:

- *“...meet the full, objectively assessed needs for market and affordable housing”* of the NPPF (2012); or
- *“...make sufficient provision for: a) housing (including affordable housing)...”* of the NPPF (2019).

- 3.11 There is also a continued concern that the matters of ‘market signals’ and ‘Affordable Housing need’ are conflated into a single issue to provide only one suggested uplift to the OAHN figure and this is not in conformity with the four stage approach from the PPG as outline above.

Conclusion regarding SHMA

- 3.12 Whilst the plan was submitted under the previous – 2012 version – of the NPPF there was sufficient known at that time that there was due to be a change in understanding housing need and how figures were to be include in Local Plans. There has been sufficient concern raised about the content of the City of York SHMA; the subsequent updates; and, the Council’s obvious attempts to apply unjustified constraints to the OAHN figure that it is considered reasonable to move away from these SHMA and instead rely on the new ‘streamlined’ approach.

- 3.13 Notwithstanding this, should the Inspectors consider it reasonable to retain a SHMA based OAHN figure in the Local Plan it is respectfully suggested that the 2017 update and the GL Hearn conclusion that includes and uplift to engage with acute Affordable Housing need should be used as the starting point. This would ensure an OAHN of at least 953 dpa is included in the Local Plan. It is considered, however, that this is still under reporting the needs in the City of York.

4.0 CHANGES TO NATIONAL POLICY

- 4.1 It is reasonable to consider the changes in national policy that have occurred before, during and since the regulation 19 consultation for the City of York Local Plan (Feb. – April 2018) and its submission (May 2018).
- 4.2 In **March 2016** the Local Plan Experts Group published a report that include a proposed methodology for calculating housing need. This was a four stage process summarised as:
- Official projections used to determine baseline demographic need;
 - Mandatory uplift of Household Formation Rates (HFR) in younger age groups;
 - Using absolute measures of affordability a prescribed market signal uplift (additional to HFR uplift) is applied;
 - Further 10% uplift applied if affordable housing need exceeds figures calculated in preceding stages.
- 4.3 Although there is no economic uplift it may still be incorporated as a policy on consideration to increase the housing requirement.
- 4.4 In **February 2017** the Government's Housing White Paper was critical of any Council not undertaking an 'honest assessment' of housing needs. And it was at this stage that a standard methodology for the OAHN was proposed (subject to further consultation in September 2017).
- 4.5 Both of these were prior to the Regulation 19 publication consultation for the City of York Local Plan.
- 4.6 In **March 2018** Government responded to the Planning for the right homes in the right places consultation, and indicated its intention to require the use of the Standard Methodology using on the 2014 based housing projections to ensure meeting the target of 300,00 home per year.
- 4.7 This occurred during the Regulation 19 consultation.
- 4.8 In **July 2018** the revised NPPF was published including the Standard Methodology for identifying housing need.
- 4.9 In **October 2018** the Government conducted a consultation regarding the necessary use of the 2014 based demographic figures
- 4.10 In **February 2019** the NPPF and PPG were revised to include the 2014 figures.
- 4.11 These three later adjustments to national policy and guidance were post the submission of the Local Plan, but in advance of the current consultation and a relevant consideration in the situation at York, where the appropriate level of housing need is unclear.

5.0 CORRESPONDENCE BETWEEN THE COUNCIL AND INSPECTORS

- 5.1 The publication of the revised NPPF was a material consideration in the examination of the Local Plan and as such there was dialogue and communication between the appointed inspectors and the city council. One of the conclusions drawn from this dialogue appears to be that the housing needs require reassessment. This the council duly undertook and in a letter of 29 January 2019 (examination ref: EX CYC 8) and reached the following conclusion (with our emphasis):

“The enclosed SHMA Update report advises that York’s OAN is 790 dwellings per annum. This is based on a detailed review of the latest published evidence including the national population and household projections and the latest mid-year estimate. The review has been undertaken based on applying the requirements of the National Planning Practice Guidance in relation to the assessment of housing need, under the 2012 NPPF. This confirms to the Council that the 867 dwellings per annum proposed in the submitted Plan can be shown to robustly meet requirements.”

- 5.2 The decision in January appears to have been to retain the originally submitted housing target to support the then assumed economic growth assumptions (but no increase for Affordable Housing need). This decision, however, has since been reversed in a letter of March 2019 (EX CYC 13) and the main modifications consultation is now proposing the reduced figure of 790 dwellings per year, which is referenced in the quote above and is a result of the latest update to the York SHMA.
- 5.3 There is an inherent tension or conflict in the letters from the Council, and the subsequent updates to the SHMA. This conflict is the continued reference to the need to update the needs figures to ‘reflect the most up-to-date’ data but there is scant regard given to updated national policy. Furthermore, as is outlined above, whilst the baseline demographic have been updated, the economic trends and Affordable Housing needs have not been updated.
- 5.4 A simple approach that avoids this tension and could well enable the Council to manage its resource use in the near future, is to consider the ‘Standard Methodology’ and what it shows for housing need in York. Identifying the correct housing need figure, is after all, the first step and the ability to plan for and deliver that need is secondary.

6.0 STANDARD METHODOLOGY FOR HOUSING NEED

6.1 In the 2018 revision of the NPPF (and the subsequent changes in 2019) Government introduced a 'simpler' standardised approach to understanding local housing needs. This revision to national policy is supported by updated planning practice guidance.

6.2 The relevant guidance is reference ID: 2a-004-20190220: *How is a minimum annual local housing need figure calculated using the standard method?* This guidance has three steps, and each is taken in turn for York in the following paragraphs (with our emphasis in guidance when necessary).

Step 1 - Setting the baseline

6.3 Using the 2014 mid-year projections, calculate the projected average annual household growth over a 10 year period (this should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period):

(a) Current year (2019)	= 90,829
(b) Ten years hence (2029)	= 99,027
(c) Annual average	= 820 (b – a / 10)

Step 2 - An adjustment to take account of affordability

6.4 The most recent median workplace-based affordability ratios, published by the Office for National Statistics at a local authority level, should be used. No adjustment is applied where the ratio is 4 or below. For each 1% the ratio is above 4 (with a ratio of 8 representing a 100% increase), the average household growth should be increased by a quarter of a percent. To be able to apply the percentage increase adjustment to the projected growth figure we then need to add 1.

$$\text{Adjustment factor} = ((8.86 - 4) / 4) \times 0.25 + 1 = 1.303$$

6.5 The adjustment factor is therefore 1.303 and is used as:

Minimum annual local housing need figure = (adjustment factor) x projected household growth

$$\text{Minimum annual local housing need figure} = 1.303 \times 820$$

The resulting figure is **1,069**.

6.6 For a plan period of 19 years (i.e. 2019 – 2038) this would equate to a minimum of 20,311 dwellings.

Step 3 - Capping the level of any increase

6.7 A cap is then applied which limits the increases an individual local authority can face. How this is calculated depends on the current status of relevant strategic policies for housing.

6.8 Where these policies were adopted within the last 5 years (at the point of making the calculation), the local housing need figure is capped at 40% above the average annual housing requirement figure set out in the existing policies.

6.9 Where the relevant strategic policies for housing were adopted more than 5 years ago (at the point of making the calculation), the local housing need figure is capped at 40% above whichever is the higher of:

a. the projected household growth for the area over the 10 year period identified in step 1; or

b. the average annual housing requirement figure set out in the most recently adopted strategic policies (if a figure exists).

6.10 The extant housing target for York was adopted more than five years ago in 2005. Therefore the 40% increase cap described above is engaged. The housing target is identified in the chapter 7 of the City of York Local Plan at 8,775 dwellings or 675 dwellings per annum.

Scenario a: $820 \times 1.4 = 1,148$

Scenario b: $675 \times 1.4 = 945$

6.11 The guidance suggests that the cap should be set at the higher of the two scenarios above, which would be scenario a. The figure of 1,148, however, is higher than the minimum set out in the standard methodology.

6.12 There is no guidance for what to do in this situation. Therefore, the more reasonable approach could be to adopt the original minimum standard figure of **1069 dwellings per annum**.

6.13 It is accepted, however, that the PPG also references the ‘submission’ of the Local Plan at ID: 2a-008-20190220. Therefore, considering the information that was available at submission of the Local Plan:

(a) Current (*Submitted*) year (2018) = 89,966

(b) Ten years hence (2028) = 98,239

(c) Annual average = 827 (b – a / 10)

Adjustment factor = $((8.62 - 4) / 4) \times 0.25 + 1 = 1.289$

Minimum annual local housing need figure = 1.289×827

The resulting figure is **1,066**.

6.14 The PPG also indicates that the standard method for assessing housing need provides a minimum starting point in determining the number of homes needed in an area. It also indicates that there may be circumstances – such as economic growth and Affordable Housing need – where it is appropriate to consider whether actual housing need is higher than the standard method indicates. It is also worth noting that the new guidance continues makes clear the distinction between ‘affordability’ and Affordably Housing need and that they are considered separately.

Economic uplift

6.15 It is clear from the data explored in the SHMA that the economic led housing need scenarios using 2014-based projections generate a need for an uplift to the minimum starting point established through that document. It is vitally important that economic trends and household formation are aligned if a Local Plan is to successfully achieve sustainable growth.

- 6.16 The PPG confirms that the standard method does not attempt to predict changing economic circumstances that may affect demographic behaviour at ID: 2a-010-20190220.
- 6.17 The figures calculated in the SHMA suggest a range (variously) between 780-814 dpa. On the face of it this **does not** require an uplift to the minimum starting point of the Standard Methodology. However, as previously cited, the council's evidence is somewhat dated in this respect.

Affordable housing need uplift

- 6.18 The need for affordable housing in the City is significant.
- 6.19 The SHMA 2019 Update confirms the need at least 573 dpa, which is some 73% of the total local OAHN figure proposed by the Council of 790 dpa.
- 6.20 This is an unsustainable level of affordable housing need and the Council has made no adjustment to its local housing need figure to accommodate this. To exacerbate matters, the recent trend in 'Right to Buy' sales shows a significant increase in take-up, which means further Affordable Homes are being lost.
- 6.21 The ONS statistics (Live returns Table 685) show that sales of homes through the 'Right to Buy' in York, which were negligible from 2008 – 2012 (presumably because of the recession), have steadily increased to an average of 73 a year in the last three years. This latter period alone has resulted in the loss of 219 Affordable Houses and if this trend continues the supply of homes will decrease as the need continues to become more and more acute.
- 6.22 Looking further at Table 685 one can also draw a comparison with the surrounding districts where 'Right-to-buy' (RtB) sales have remained reasonably low and collectively, between 7 districts, at around 50 homes a year. This trend suggests that there is a pull towards York for Affordable Homes. This pull is reflective of people's desire to live there meaning the need to supply these homes, in the right place where people want to live is a social and NPPF imperative.
- 6.23 Comparative RtB losses to affordable housing stock for York UA and N Yorkshire authorities since 2010 are as follows:

	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	Total
York UA	10	6	24	53	52	68	79	72	364
Craven	
Hambleton	
Harrogate	5	1	10	13	17	12	26	24	108
Richmondshire	2	1	5	7	9	7	8	11	50
Ryedale	
Scarborough	
Selby	3	3	10	16	25	13	22	21	113
N Yorkshire (total)	10	5	25	36	51	32	56	56	271

- 6.24 We consider this is in no small part reflective of the strong housing market across the city which has been fuelled by under-delivery of new-build homes in recent years, both general market and affordable housing.
- 6.25 The NPPF 2019 places great emphasis on addressing affordable housing needs as part of the Plan making process. The Council's current policy approach to affordable housing delivery will see, at the highest level of the spectrum set out in draft Policy H10, 30% provision. Even if the 30% provision was to be applied to every residential scheme coming forward in York over the Plan period, which certainly will not be the case, the Council will only achieve 237 dpa. This will lead to a shortfall of at least 336 dpa.
- 6.26 To address the affordable housing need in full based on draft Policy H10 the OAHN would need to be increased to 1,910 dpa.
- 6.27 This clearly demonstrates a need to increase the OAN above the 790 dpa proposed by the Council and could be an indication to increase the minimum starting point established through the standard methodology.
- 6.28 At stages GL Hearn has suggested a 10% and 15% uplift to the demographic baseline. Taking these suggestions would provide the following OAHN figure (against the 2018 baseline calculation of 1,066):
- 10% uplift: 1,172 dpa or 23,440 homes across 20 years
 - 15% uplift: 1,226 dpa or 24,518 homes across 20 years

7.0 LAND CAPACITY IN YORK

- 7.1 The Council's latest Strategic Housing Land Availability Assessment (2018 – reference: SD049) suggests that there are '250 land parcels' that were deemed reasonable alternatives to be taken forward for Sustainability Appraisal. However, there does not appear to be a total land capacity assessment within the assessment to realistically understand if there is a prospect for the delivery of the housing need.
- 7.2 From 'Figure 6' the Plan Trajectory of page 38 there is a quoted number of "Cumulative Completions" that includes a windfall allowance. This totals 21,436 dwellings. This demonstrates that there is a reasonable expected capacity in York, which with addition of a limited number of additional sites could be elevated to achieve the 24,518 figure.
- 7.3 Should the Council not be able to identify the land capacity for its identified needs, of course, then the appropriate action is to work with its neighbours under the Duty to Co-operate and look to meet unmet needs elsewhere.

8.0 FIVE YEAR HOUSING LAND SUPPLY

8.1 A change to the identified housing need, will of course, have an impact on both the whole plan development trajectory but also the five year housing land supply.

8.2 The purpose of this report is not to analyse the deliverability of proposed allocated sites, or others identified in the five year supply. However, to take the Council's assessment (from page 39 of document SD049) at face value, but applying need figure scenarios resulting from applying the standard methodology provides the following:

Annual housing target across the Plan period	1,066	1,069	1,172	1,226
Cumulative Housing target (2017/18 - 2022/23)	5,330	5,345	5,860	6,130
20% Buffer required for flexibility	6,396	6,414	7,032	7,356
Total dwellings estimated to be complete within 5 years (2017/18-2022/23)	6,877	6,877	6,877	6,877
Under/over-supply of housing	+481	+463	-155	-479
Five year land supply	5.38	5.36	4.89	4.67

*NB under the standard methodology there is no need to consider previous under supply.

8.3 A review of the currently stated land supply position in York suggests that in the next five years, at least, there is capacity to set a housing target that reflects the standard methodology minimum. There could well be opportunities to support the uplifted figure to support the delivery of Affordable Housing.

9.0 CONCLUSION

- 9.1 This report has reflected on the evolution of housing needs assessments in York. The SHMA iterations that have been produced have conflated issues and under-represented need or indeed have been deliberately suppressed. The latest 2019 'update' to the SHMA uses data produced from those previous iterations and can only be considered to be flawed.
- 9.2 There is an inherent conflict in the Council's approach to attempt to use the most up-to-date data, but not the most recent national policy and guidance. The flaws in the SHMA and the tensions created by the Council's approach can all be disregarded if the SHMA is set aside in preference for the 'Standard Methodology' for identifying housing need.
- 9.3 Notwithstanding this, should the Inspectors consider it reasonable to retain a SHMA based OAHN figure in the Local Plan it is respectfully suggested that the 2017 update and the GL Hearn conclusion that includes and uplift to engage with acute Affordable Housing need should be used as the starting point. This would ensure an OAHN of at least 953 dpa is included in the Local Plan. It is considered, however, that this is still under reporting the needs in the City of York.
- 9.4 The housing need figure should be a **minimum** of 1,066 dpa and the most appropriate figure is likely to be **1,226 dpa** to engage with the significant and acute need for Affordable Housing in York.
- 9.5 The stated land supply of the 2018 SHLAA appears to suggest that the Council has the ability to identify sites (and include a windfall allowance) that is close to achieving the need figures. It should also be possible, with a review of the SHLAA, to update the plan and include a limited number of additional sites to fully meet the needs.

From: Nicholas Mills [nicholas.mills@lichfields.uk]
Sent: 22 July 2019 13:30
To: localplan@york.gov.uk
Cc: [REDACTED]
Subject: York Local Plan Proposed Modifications Consultation - Representations on behalf of Taylor Wimpey UK Limited [NLP-DMS.FID632514]
Attachments: 61001_01 Taylor Wimpey Reps to York Local Plan Proposed Mods 22-07-19.PDF; 61001_01 Local_Plan_Proposed_Modifications_Consultation_Response_Form_2019 (PM44).PDF; 61001_01 Local_Plan_Proposed_Modifications_Consultation_Response_Form_2019 (PM39).PDF; 61001_01 Local_Plan_Proposed_Modifications_Consultation_Response_Form_2019 (PM22).PDF; 61001_01 Local_Plan_Proposed_Modifications_Consultation_Response_Form_2019 (PM21d).PDF; 61001_01 Local_Plan_Proposed_Modifications_Consultation_Response_Form_2019 (PM21c).PDF; 61001_01 Local_Plan_Proposed_Modifications_Consultation_Response_Form_2019 (PM21b).PDF; 61001_01 Local_Plan_Proposed_Modifications_Consultation_Response_Form_2019 (PM21a).PDF; 61001_01 Local_Plan_Proposed_Modifications_Consultation_Response_Form_2019 (PM20d).PDF; 61001_01 Local_Plan_Proposed_Modifications_Consultation_Response_Form_2019 (PM20c).PDF; 61001_01 Local_Plan_Proposed_Modifications_Consultation_Response_Form_2019 (PM20b).PDF; 61001_01 Local_Plan_Proposed_Modifications_Consultation_Response_Form_2019 (PM20a).PDF; 61001_01 Local_Plan_Proposed_Modifications_Consultation_Response_Form_2019 (PM5).PDF; 61001_01 Local_Plan_Proposed_Modifications_Consultation_Response_Form_2019 (PM4).PDF; 61001_01 Local_Plan_Proposed_Modifications_Consultation_Response_Form_2019 (PM3).PDF

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Dear Sir/Madam

I refer to the above consultation and attach representations prepared on behalf of Taylor Wimpey UK Limited in relation to their land interest at Brecks Lane, Strensall.

The representations comprise the following documents:

- Completed Representation Forms
- Detailed representations report

Please can you confirm receipt of these representations by return.

Should you have any queries regarding the submitted documents please do not hesitate to contact me.

Kind regards

Nicholas Mills
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City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

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To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make.

Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
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Last Name		Mills
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Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

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Part B -Your Representation

(Please use a separate Part B form for each issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM3

Document:

Local Plan Proposed Modifications

Page Number:

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4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

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What does 'Sound' mean?

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Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

Please see the attached representations report for detailed representations.

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

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Signature

Date

City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

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Please fill in a separate part B for each issue/representation you wish to make.

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Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Nicholas
Last Name		Mills
Organisation (where relevant)		Lichfields
Representing (if applicable)		Taylor Wimpey UK Limited
Address – line 1		Ship Canal House
Address – line 2		98 King Street
Address – line 3		Manchester
Address – line 4		
Address – line 5		
Postcode		M2 4WU
E-mail Address		nicholas.mills@lichfields.uk
Telephone Number		0161 837 6130

Guidance note

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM4

Document:

Local Plan Proposed Modifications

Page Number:

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5.(1) Do you consider that the Local Plan is Sound?

Yes No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared **Justified**

Effective **Consistent with national policy**

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Title		Mr
First Name		Nicholas
Last Name		Mills
Organisation (where relevant)		Lichfields
Representing (if applicable)		Taylor Wimpey UK Limited
Address – line 1		Ship Canal House
Address – line 2		98 King Street
Address – line 3		Manchester
Address – line 4		
Address – line 5		
Postcode		M2 4WU
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Proposed Modification Reference:

PM5

Document:

Local Plan Proposed Modifications

Page Number:

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Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Nicholas
Last Name		Mills
Organisation (where relevant)		Lichfields
Representing (if applicable)		Taylor Wimpey UK Limited
Address – line 1		Ship Canal House
Address – line 2		98 King Street
Address – line 3		Manchester
Address – line 4		
Address – line 5		
Postcode		M2 4WU
E-mail Address		nicholas.mills@lichfields.uk
Telephone Number		0161 837 6130

Guidance note

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Part B -Your Representation

(Please use a separate Part B form for each issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM20a

Document:

Local Plan Proposed Modifications

Page Number:

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4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

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No

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Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared

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Effective

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Please see the attached representations report for detailed representations.

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Signature

Date

City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

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Proposed Modification Reference:

PM20b

Document:

Local Plan Proposed Modifications

Page Number:

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Proposed Modification Reference:	PM20c
Document:	Local Plan Proposed Modifications
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City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

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Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Nicholas
Last Name		Mills
Organisation (where relevant)		Lichfields
Representing (if applicable)		Taylor Wimpey UK Limited
Address – line 1		Ship Canal House
Address – line 2		98 King Street
Address – line 3		Manchester
Address – line 4		
Address – line 5		
Postcode		M2 4WU
E-mail Address		nicholas.mills@lichfields.uk
Telephone Number		0161 837 6130

Guidance note

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM20d

Document:

Local Plan Proposed Modifications

Page Number:

What does 'legally compliant' mean?

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4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

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No

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Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

Please see the attached representations report for detailed representations.

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

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Part B -Your Representation

(Please use a separate Part B form for each issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM21a

Document:

Local Plan Proposed Modifications

Page Number:

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PM21b

Document:

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Page Number:

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You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

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7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There is the need to examine some fundamental aspects of the local plan. We would therefore like the opportunity to participate at the oral part of the examination.

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

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Date

City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

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Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Nicholas
Last Name		Mills
Organisation (where relevant)		Lichfields
Representing (if applicable)		Taylor Wimpey UK Limited
Address – line 1		Ship Canal House
Address – line 2		98 King Street
Address – line 3		Manchester
Address – line 4		
Address – line 5		
Postcode		M2 4WU
E-mail Address		nicholas.mills@lichfields.uk
Telephone Number		0161 837 6130

Guidance note

Where do I send my completed form?

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Do I have to use the response form?

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM21c

Document:

Local Plan Proposed Modifications

Page Number:

What does 'legally compliant' mean?

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4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared **Justified**

Effective **Consistent with national policy**

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

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6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

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Date

City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

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First Name		Nicholas
Last Name		Mills
Organisation (where relevant)		Lichfields
Representing (if applicable)		Taylor Wimpey UK Limited
Address – line 1		Ship Canal House
Address – line 2		98 King Street
Address – line 3		Manchester
Address – line 4		
Address – line 5		
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E-mail Address		nicholas.mills@lichfields.uk
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Part B -Your Representation

(Please use a separate Part B form for each issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:	PM21d
Document:	Local Plan Proposed Modifications
Page Number:	

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No

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Part B -Your Representation

(Please use a separate Part B form for each issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM22

Document:

Local Plan Proposed Modifications

Page Number:

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4. Based on the Proposed Modification or new evidence document indicated:

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Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared

Justified

Effective

Consistent with national policy

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

Please see the attached representations report for detailed representations.

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

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Signature

Date

City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

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Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make.

Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Nicholas
Last Name		Mills
Organisation (where relevant)		Lichfields
Representing (if applicable)		Taylor Wimpey UK Limited
Address – line 1		Ship Canal House
Address – line 2		98 King Street
Address – line 3		Manchester
Address – line 4		
Address – line 5		
Postcode		M2 4WU
E-mail Address		nicholas.mills@lichfields.uk
Telephone Number		0161 837 6130

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

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Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

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Do I need to attend the Public Examination?

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All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:	PM39
Document:	Local Plan Proposed Modifications
Page Number:	

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

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Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared **Justified**

Effective **Consistent with national policy**

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

Please see the attached representations report for detailed representations.

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

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Last Name		Mills
Organisation (where relevant)		Lichfields
Representing (if applicable)		Taylor Wimpey UK Limited
Address – line 1		Ship Canal House
Address – line 2		98 King Street
Address – line 3		Manchester
Address – line 4		
Address – line 5		
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Part B -Your Representation

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3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM44

Document:

Local Plan Proposed Modifications

Page Number:

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Effective

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Signature

Date

City of York Local Plan
Proposed Modifications
Consultation

Representations on behalf of
Taylor Wimpey UK Limited

July 2019

LICHFIELDS

LICHFIELDS

Lichfields is the pre-eminent planning and development consultancy in the UK

We've been helping create great places
for over 50 years.

lichfields.uk

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1.0 Introduction

- 1.1 This report has been prepared by Lichfields on behalf of Taylor Wimpey UK Limited [Taylor Wimpey]. It forms Taylor Wimpey’ **response to the City of York Local Plan** Proposed Modifications (June 2019) Consultation, in respect of **Taylor Wimpey’ land interests** in land at Brecks Lane, Strensall. Representations seeking the allocation of the site have been submitted by Lichfields to City of York Council at various stages of the emerging Local Plan.
- 1.2 The Brecks Lane site is identified on the York Local Plan Proposals Map as lying within the Green Belt. Taylor Wimpey is seeking the allocation of the site in the City of York Local Plan for residential development. A plan showing the location of the site is attached at Appendix 1.
- 1.3 These representations are accompanied by a Housing Technical Report, which has been produced on behalf of a consortium of developers including Taylor Wimpey (see Appendix 3). The Housing Technical Report provides a review of the Housing Needs Update prepared by GL Hearn on behalf of the Council which advises a reduction in minimum annual provision from 867 dwellings to 790 dwelling per annum. In particular, two main issues are analysed:
- 1 **A review of CYC’s existing evidence on housing needs and establishing the scale of need and demand for market/affordable housing in the City; and,**
 - 2 **An appraisal of the housing trajectory and five-year land supply position which underpins CYC’s Plan.**
- 1.4 It is a statutory requirement that every development plan document must be submitted for **independent examination to assess when it is “sound”**, as well as whether other statutory requirements have been satisfied (s.20(5) of the 2004 Act). S19 of the 2004 Act requires that in preparing a development plan document, a local planning authority must have regard to a number of matters including national policies and advice contained in guidance issued by the Secretary of State. Such guidance currently exists in the form of the National Planning Policy Framework [the Framework] and the National Planning Practice Guidance [Practice Guidance].
- 1.5 The Framework¹ (February 2019) states that the policies in the previous Framework published in March 2012 will apply for the purpose of examining plans, where those plans were submitted on or before 24 January 2019. The York Local Plan was submitted to the Secretary of State for Housing, Communities and Local Government for examination in May 2018. The policies in the Framework (March 2012) therefore apply in this instance.
- 1.6 **There is no statutory definition of “soundness”.** However, the Framework² states that to be sound a Local Plan should be:
- 1 **Positively Prepared:** The plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
 - 2 **Justified:** The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.
 - 3 **Effective:** The Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

¹ National Planning Policy Framework (February 2019) Annex 1: Implementation

² National Planning Policy Framework §182

4 Consistent with National Policy: The Plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

1.7 In addition, the Framework³ states that:

“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

For plan-making this means that:

- *Local planning authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *specific policies in this Framework indicate development should be **restricted.....”***

1.8 The Core Planning Principles are set out in the Framework⁴.

1.9 The requirements of the Framework in respect Local Plans are reinforced in the Practice Guidance⁵ which states that the Framework **“sets clear expectations as to how a Local Plan must be developed in order to be justified, effective, consistent with national policy and positively prepared to deliver sustainable development that meets local needs and national priorities”**.

Structure

1.10 This report supplements the completed representation form and demonstrates that a number of policies within the Local Plan Proposed Modifications [LPPM] **are, at present, ‘unsound’ in the** context of the tests of soundness established by the Framework.

1.11 The report firstly provides background context to the Brecks Lane site to demonstrate why its removal from the Green Belt and allocation for residential development is appropriate.

1.12 This report then provides detailed representations in relation to the following proposed modifications:

- 1 Modification PM3 – Explanation of City of York Housing Needs
- 2 Modification PM4 – Policy SS1: Delivering Sustainable Growth for York
- 3 Modification PM5 – Policy SS1: Delivering Sustainable Growth for York
- 4 Modification PM20a to PM20d – Policy H1: Housing Allocations
- 5 Modification PM21a to PM21d – Policy H1: Housing Allocations
- 6 Modification PM22 – Policy H1: Housing Allocations Explanation

³ National Planning Policy Framework §14

⁴ National Planning Policy Framework §17

⁵ Practice Guidance - ID: 12-001-20170728

7 Modification PM39 – Policies Map Green Belt Change – Strensall Village

8 Modification PM44 – Table 15.2: Delivery and Monitoring of Housing

1.13 Recommendations are set out at the end of each Modification section setting out how the Council needs to address the Modification to make it sound.

2.0 **Background to the Brecks Lane Site**

Introduction

- 2.1 The Brecks Lane site was included in previous York Local Plan [YLP] consultation documents as a residential allocation but was identified within the YLP-Preferred Sites [YLP-PS] as **‘Proposed Removed Land’**. The site was referred to as ‘Land at the Brecks’ [Allocation Ref. H27] in the YLP- Preferred Options [YLP-PO].
- 2.2 At that time Linden Homes strongly objected to Land at Brecks being listed within Table 9 (deleted housing sites from the Local Plan Publication draft) and requested that it was rightly included within Table 7 (Potential General Housing Allocations).
- 2.3 It was considered that the reasons for discounting the site as a residential allocation were incorrect for the following reasons:
- 1 The site has historically been seen as outside the Green Belt at different stages of plan preparation;
 - 2 **The Council’s evidence base has previously supported the allocation of the site and further technical assessments do not alter its previous conclusions;**
 - 3 The site makes a very limited or no contribution towards Green Belt purposes; and,
 - 4 The development of the site would assist in the delivery of sustainable development within the City.

Policy History of the Site and Evidence Base

- 2.4 Historically, the site has never been included within a defined Green Belt boundary and no Proposals Map has shown it as such. The site was not shown within the Green Belt in the York Green Belt Local Plan - Modifications (1995); the Southern Ryedale Local Plan - Modifications (1996); and, the City of York Local Plan – 3rd & 4th Sets of Proposed Changes (2003 & 2005). Indeed, it is shown as safeguarded land in the latter document.
- 2.5 More recently, the site was allocated for housing in the Preferred Options Draft Local Plan [YLP-PO] (June 2013) and subsequent Publication Draft Local Plan [YLP-PD] (September 2014). The allocation was a result of the site passing the suitability criteria set out in the Site Selection Paper (2013), Further Sites Consultation (2014) and the Site Selection Paper Addendum (2014).
- 2.6 According to Section 3.0 of the YLP-PS, the revised portfolio of sites was based on further technical assessment, which included updated sustainability criteria; updated officer comments; transport; education; open space; agricultural land classification; sequential flood risk; and Green Belt appraisal. This evidence did not support the exclusion of the site from the list of allocations.
- 2.7 Of the further technical assessments listed in the YLP-PS, only the Green Belt appraisal was considered relevant to the decision to no longer include Brecks Lane as an allocation. The YLP-PS specified at §3.2 that *“work is ongoing to look at the parcels of land around York to understand their significance and contribution against the Green Belt purposes, as set out in NPPF”*. This information is not currently available to the public.
- 2.8 The table at page 214 of the YLP-PS was clear that the site’s location within the Green Belt was the reason for its deletion as an allocation:

“The site has recently (March 2015) been refused by the Inspector and Secretary of State at appeal (APP/C2741/V/14/2216946). The decision concludes that the development would impact on 4 of the 5 Green Belt purposes including on openness encroachment and unrestricted sprawl, that its development would cause substantial harm to the greenbelt and that this harm would not be justified by very special circumstances. For these reasons it is recommend that that the site is not included as an allocation”.

- 2.9 It is acknowledged that the conclusion of the Inspector and Secretary of State [SoS] was that Brecks Lane should be considered as within the outer extent of the Green Belt. In this context, it was found that the site served a number of Green Belt purposes [IR§199]⁶. However, these Green Belt issues were inevitably going to be identified as part of any assessment of the residential development being considered. Therefore, using this as an argument to support a justification to not allocate the site is not a sound basis on which to discount the site in a plan making context.
- 2.10 In the context of the appeal, once the Inspector and SoS concluded that the site should be considered as within the general extent of the Green Belt, it was necessary to address the requirements of the Framework⁷ (i.e. whether ‘very special circumstances’ existed which justified the development). The conclusions in the decision were therefore reached on the basis that the site is located in the Green Belt, rather than in the context of its contribution to the Green Belt and whether it should be located within it. These are matters for the Council to assess when considering the future allocation of the site for development in the Local Plan.
- 2.11 It is important to highlight that the Inspector and SoS reached the decision on the Green Belt status of the site based on the Key Diagram of the partially revoked Yorkshire and Humber Regional Strategy (2008) [YHRS]. The Inspector acknowledged that the use of this plan was ill conceived [IR §187], but the conclusion was drawn because the issue of where the outer boundary of the Green Belt is to be drawn (and boundaries to individual settlements) remains unresolved in any adopted plan. The Inspector was unable to give any weight to the policy history of the site, but this does not preclude the allocation of the site for residential development in the YLP, as it is this document that will set detailed Green Belt boundaries for the first time.
- 2.12 It is for the YLP to draw the boundaries of the Green Belt having regard to the guidance set out in the Framework and to ensure that it takes account of the longer term development requirements of the City. The Council has confirmed on many occasions that the Brecks Lane site does not serve any Green Belt purposes. The previous policy approach to the site, together with its inclusion as an allocation in the earlier drafts of the YLP, all demonstrate that it does not perform a Green Belt function and is suitable for development in this regard. The Council has previously followed the guidance in the Framework which emphasises that land which is unnecessary to keep permanently open should not be included within the Green Belt. The current approach does not.
- 2.13 Whilst the YLP-PS referred to further assessments that have been carried out since the aborted YLP (2014), there was no new evidence to suggest that there is any reason to remove Brecks Lane as an allocation.
- 2.14 No new evidence was provided in the Local Plan Pre-Publication Draft [LPPP] and its evidence base. The Local Plan preferred Sites Consultations Statement (2017) simply summarised representations made on the site through the YLP-PS consultation and did not shed any further

⁶ IR refers to the Inspector’s Report into the Brecks Lane application

⁷ Framework §87

light on the reasons for its exclusion. The justification for its deletion appears to be based solely on the conclusions reached by the Inspector and SoS in relation to the call-in Inquiry. This approach is unjustified and disregards the basis on which the Inspector and SoS were required to make their decision at that time. The Framework makes clear the basis of judgements in decision making and it is improper to rely upon this when progressing with a Local Plan.

- 2.15 No further substantive evidence has been provided in the Local Plan Publication Draft [LPP] and its evidence base. The LPP Sustainability Appraisal – Appendix K identifies the site [Site Ref: 49] as a **“Reasonable- Previous Allocation H27”** alternative site but states that it was rejected **“due to impacts on landscape”**. No further explanation is given for its rejection.
- 2.16 In summary, the site has consistently been excluded from draft Green Belt boundaries (including specific recommendations in the York Green Belt Local Plan and Southern Ryedale Local Plan inquiries) and the Council has confirmed on many occasions that it does not serve **any Green Belt purposes. It is incorrect for the Council to rely on the SoS and Inspector’s** conclusions in relation to the call-in Inquiry in discounting Brecks Lane as an allocation as this decision was made in the context of the site being situated within the Green Belt and whether its development was justified by very special circumstances (and it was found that it was not). This does not preclude a proper consideration of whether the site should be located within the Green Belt and its contribution to Green Belt purposes.

Green Belt Purposes

- 2.17 A consideration of the site against the Framework⁸ demonstrates that it does not serve any specific role when compared against the five purposes of the Green Belt.

Purpose 1 - To Check the Unrestricted Sprawl of Large Built-Up Areas

- 2.18 The village of Strensall is not part of the main urban area of York and the site does not therefore have a role in restricting the urban sprawl of a large built-up area. Instead, it merely fills in a small gap between existing development and the natural boundary to development. The **terminology of ‘sprawl’ suggests disorganised or unplanned** expansion, whereas the development of land at Brecks Lane has been envisaged since the Southern Ryedale Local Plan in 1991. This is evident in the fact that the road layout of the adjacent residential area enters the site and terminates with a turning head, and also that its eastern boundary is formed by an established tree belt. Both of these physical features were provided as part of the existing development and were intended to facilitate development of the land. They clearly demonstrate that the Council considered that the site should be developed for housing at a future date.
- 2.19 In addition, the site is substantially contained by built development. It is bounded to the west by a residential estate built in the 1990s, to the north by the River Foss, to the east by an established tree belt and to the south by a road (Brecks Lane) and the York-Scarborough railway line.
- 2.20 **In the appeal decision, the Inspector [IR§191] recognised that the site is “close to defensible boundaries, of the sort that might be chosen as settlement boundaries”.** This is also accepted in **the Council’s summary of the site at page 214 of the YLP-PS**, which confirms that **“The northern boundary of the site is formed by dense vegetation, including some mature trees with the River Foss. The eastern edge of the site is also formed by dense vegetation belt. The western boundary is formed by residential properties which comprise part of Strensall urban area and the southern boundary is formed by Brecks Lane with the Transpennine railway line beyond”.**

⁸ Framework §80

- 2.21 These conclusions indicate that in the context of Green Belt purposes, the site is well contained and has strong robust and defensible boundaries. It does not therefore represent part of a potentially continuous urban sprawl. This is therefore not on its own a reason to discount the site.

Purpose 2 - To Prevent Neighbouring Towns Merging Into One Another

- 2.22 This is a principle purpose for the designation of Green Belt and yet land at Brecks Lane plays no role in it. This is confirmed in the **Inspector's Report [§197], which states that "The only one of the five Green Belt purposes which this site offers nothing to is that of preventing neighbouring towns merging into one another. Strensall is a large settlement that has expanded into open countryside, but it is a significant distance (at the appeal site location) from the next settlement"**.

Purpose 3 - To Assist in Safeguarding the Countryside from Encroachment

- 2.23 The site is largely contained by development with a strong landscape boundary to the east, which would be further enhanced as part of any development proposals. It does not therefore form part of the open countryside but relates to the urban area of Strensall.
- 2.24 The Inspector reached the conclusion that the **"purpose of safeguarding the countryside from encroachment also applies, given that that is currently an undeveloped field area, with exception of modest hard-surfaced areas, would become housing under this scheme [sic]" [IR §194]**. This could be applied equally to any undeveloped site within the Green Belt and is fundamentally based on the finding that the site lay within the Green Belt. The fact that land at Brecks Lane is greenfield, lies on the edge of an existing settlement and is thus open and having the appearance of countryside inevitably means that its development might be said to have an adverse effect in terms of encroachment on the open countryside. The same is equally true of any site located on the edge of any urban area. However, when making a reasoned judgement, it can be concluded that the site will not involve encroachment into the open countryside as it is **divorced from the open countryside and it forms a logical small extension to Strensall's urban area**. This is therefore not on its own a reason to discount this site.

Purpose 4 - To Preserve the Setting and Special Character of Historic Towns

- 2.25 The IR states at §195 that **"developing the site would not have a direct significant bearing on the historic character of the City"**. It can therefore be concluded that as the surrounding area is not of heritage value, the site makes no contribution to this Green Belt purpose. Whilst the Inspector came to the view that it may be visible from the adjacent railway and therefore there is some perception of the site in the approach to the historic city of York, no significant harm was identified.
- 2.26 The development of the site itself will not impact upon wider views of the urban area of Strensall. In fact, it affords an opportunity to enhance the substantial visual screen at the northern and eastern boundary. This is therefore not on its own a reason to discount this site.

Purpose 5 - To Assist in Urban Regeneration, By Encouraging the Recycling Of Derelict and Other Urban Land

- 2.27 Whilst the Inspector considered that preventing development on the site and other Green Belt land is **"likely to encourage development of brownfield land"** [§196], it is for the Council to make a judgement on the identification of the most appropriate land to be used for development through the process of preparing the YLP. This should be evidenced and be based upon detailed

analysis of the supply of such sites. It is considered that the Council does not have a 5-year supply of deliverable housing land and consequently, there is significant pressure to bring forward development sites such as Brecks Lane to meet the shortfall. There is no evidence to suggest that development of this site for housing will prevent the recycling of derelict land or other urban land elsewhere. This is therefore not on its own a reason to discount this site.

Suitability of Land at Brecks Lane for Development

- 2.28 **The Council’s own assessment of Brecks Lane proves that it is a suitable housing site.** This is **acknowledged in the Planning Officer’s report to the City of York Council Planning Committee** (20th February 2014) which confirmed that the planning application represented sustainable development and that there would be economic, social and environmental benefits that arise from the scheme. The case for the Council at the Brecks Lane Inquiry [IR §111] also recognises that *“the planning history coupled with the lack of any site specific constraints of material weight, should mean that there is at least a reasonable prospect of the site being allocated in a future Local Plan”*. The Inspector therefore accepted that the consideration of whether the site should be designated as Green Belt was fundamentally different to the determination of the application in the context of the RS policies and that there was a reasonable prospect of the site being excluded from the Green Belt and allocated for development as part of the forthcoming Local Plan.
- 2.29 As detailed above, the Council proposed to allocate Brecks Lane for housing development in the YLP following its assessment against criteria set out in the Site Selection Paper (2013), Further Sites Consultation (2014) and the Site Selection Paper Addendum (2014). There has been no material change in site circumstances since this time and the Preferred Sites Consultation Sustainability Appraisal identified less negative social, economic and environmental effects resulting from the allocation of the Brecks Lane site than a number of the other proposed sites in and around the City. The only significant negative effects are in relation to the greenfield nature of the site and its distance to education establishments. In this context it is important to highlight that the sustainable development of greenfield land is an important and necessary component of the housing land supply in the City to ensure that identified housing needs are met in full. In relation to education, an off-site contribution to both primary and secondary school places was proposed as part of the planning application for Brecks Lane. This negative effect would therefore be mitigated following the development of the site.
- 2.30 The site layout submitted with the planning application indicates a high quality residential development comprising 102 family dwellings along with highways infrastructure, landscaping and public open space (see Appendix 2 - plan ref. 3585/10 Rev G). The scheme was designed to integrate into the existing settlement and responds directly to the character of the landscape and village context, as well as the opportunities presented by the landscape features within the site.
- 2.31 The allocation of Brecks Lane would assist in the delivery of sustainable development within the City by making a significant contribution towards meeting the need for market and affordable housing. It has also been demonstrated that the site would deliver economic, social and environmental gains in accordance with the Framework. In summary:
- 1 The site would make a significant contribution to the housing land supply including affordable housing in the area. This is particularly important when considered in the context of the current lack of a Framework compliant 5-year housing supply.
 - 2 The site is in a sustainable and accessible location which has the potential to encourage future residents to travel by sustainable modes of transport, including walking and cycling.
 - 3 There are no insurmountable constraints to the site or its development and is deliverable within the next five years.

- 4 The development would deliver ecological improvements and secure the maintenance and long-term protection of key ecological assets in the area.
- 5 The development would not impact upon the landscape beyond the site because of its boundary of mature trees and shrubs.
- 6 The development would provide public open space in excess of the requisite standards which will meet needs arising from the proposed development and the existing community.
- 7 The development of the site would have no unacceptable environmental impacts or create unacceptable impacts upon amenity of new and existing residents.
- 8 The development of the site would provide a cohesive residential development with the scheme already built to the west of it. Indeed, the road layout of the adjacent development includes a turning head leading from Heath Ride into the site itself and access points from Green Lane and Tudor Way.
- 9 The site would deliver significant economic benefits through both direct and indirect employment opportunities during the construction phase.

2.32 In addition to its contribution to sustainable development, there is robust, up to date evidence to support the deliverability of Brecks Lane and the Council has previously assessed it against criteria which determined it to be one of the most suitable locations to meet the housing needs of the City. For these reasons, it should therefore remain as an allocated site for housing development within the Local Plan.

Deliverability

- 2.33 The Framework⁹ states that for sites to be considered deliverable, they must be suitable, available and achievable. The land at Brecks Lane meets all of these requirements:
- 1 Suitable: the site can be accessed from access points from Heath Road, Green Lane and Tudor Way. It is located within an established residential area, close to the village centre, and provides the opportunity to increase housing provision within Strensall without impacting upon the wider landscape.
 - 2 Available: The site is in the ownership of a willing landowner who is looking to release it for development.
 - 3 Achievable: The site is capable of coming forward for development in the short term as soon as a developer has secured the grant of planning permission.

2.34 The Technical Report on Housing Issues prepared by Lichfields and submitted with these representations sets out our concerns in relation to the **Council's housing requirement and** housing supply.

2.35 It concludes that the Council is not providing sufficient land to meet the housing needs of the City and further sites should be allocated for housing development as part of the YLP. The Local Plan is **therefore not soundly based and it is requested that the calculation of York's Objective** Assessment of Housing Needs [OAHN] is revisited, and that Brecks Lane is allocated for residential development in order to help make up for the shortfall in housing land.

Conclusion

2.36 The Brecks Lane site has been excluded from draft Green Belt boundaries on numerous occasions and designated for possible future development. The Council has also concluded that

⁹ Framework footnote 11, page 12

it serves none of the purposes and objectives of such a designation as set out in the Framework¹⁰. This is recognised in the fact that the site had been allocated for development within the emerging YLP for a considerable period of time.

- 2.37 It is incorrect for the Council to rely on the conclusions reached by the SoS and Inspector in relation to a call-in Inquiry to justify the deletion of Brecks Lane as a housing allocation. The **SoS and Inspector's decision was made in an entirely different context to its proposed allocation** and does not preclude a proper consideration of whether the site should be located within the Green Belt and its contribution to Green Belt purposes.
- 2.38 Land at Brecks Lane is a suitable site for housing development that would have no unacceptable environmental impacts or create unacceptable impacts upon amenity of new and existing residents. There are no insurmountable constraints to the site or its development and is deliverable within the next five years.
- 2.39 Separate evidence has been provided as to how the proposed OAHN for York is not robust and is inadequate to meet need and demand within the Housing Market Area. As such, the housing site allocations put forward in the LPP would fail to deliver a housing supply sufficient to achieve the sustainable growth of the City. It is therefore important for the Council to allocate additional land, particularly the site at Brecks Lane, to meet the housing needs of the community.
- 2.40 Drawing these points together, it is requested that the Local Plan is amended to include Land at Brecks Lane as a Housing Allocation.

¹⁰ Framework §§79-80

3.0

Modifications PM3 PM4, PM5, PM20a to PM20d, PM21a to PM21d, PM22 and PM44

Introduction

3.1

The above modifications relate to the modification to Policy SS1 which sets a need to deliver a minimum annual provision of 790 new dwellings over the plan period to 2032/33 and post plan period to 2037/38. The annual dwelling requirement has been reduced from the 867 dwellings per annum proposed in the Local Plan Publication Draft.

3.2

An updated version of Figure 6 of the May 2018 SHLAA has been produced as a background document to accompany the modifications, based on the revised annual dwelling requirement put forward by the Council.

Consideration of Modifications

3.3

Taylor Wimpey object to Modification PM5 (and associated modifications) as it is considered that the **Council's proposed objectively assessed housing need (OAHN) is not based on a robust assessment** which is compliant with the Framework. On behalf of Taylor Wimpey, and a wider consortium of housebuilders, Lichfields has undertaken a review of the work prepared by GL Hearn on behalf of the Council which advises a reduction in minimum annual provision from 867 dwellings to 790 dwelling per annum.

3.4

Lichfields review concludes that on the basis of the approach taken to reaching the 790 dpa housing requirement identified within the City of York Housing Needs Update (January 2019) (**"the 2019 HNU"**), **and prior iterations of that study, that this housing requirement fails to meet the full OAHN**, which is significantly higher than the Council has estimated.

3.5

Furthermore, we consider that the Plan would fail to make appropriate provision for sufficient **housing to sustainably deliver, in a timely manner, housing in line with the City's full OAHN**, with further site allocations required within this Plan in order to ensure an overall strategy that is deliverable and sufficiently flexible to respond to change.

3.6

Lichfields' analysis can be found at Appendix 3. The main conclusions of the review are set out below:

- 1 Demographic Baseline: The 2016-based household projections indicate a net household growth of 458 dpa between 2017 and 2033 (including a suitable allowance for vacant/second homes. Once a suitable adjustment has been made to rebase the projections to the (slightly higher) 2017 and 2018 MYEs, and through the application of accelerated headship rates amongst younger age cohorts, takes the demographic starting point to 706 dpa. However, an analysis of the MYE estimates has raised significant concerns regarding the robustness of the international migration statistics underpinning the 2016-based SNPP. Applying long term trends to international migration levels into York, which are more in line with net migration into the City, this would increase the demographic starting point to 921 dpa.
- 2 Market Signals Adjustment: **GL Hearn's** uplift is 15%. However, for the reasons set out above, Lichfields considers that a greater uplift of at least 20% would be more appropriate in this instance. When applied to the 921 dpa re-based demographic starting point, this would indicate a need for 1,105 dpa.
- 3 Employment growth alignment: The demographic-based projections would support a reasonable level of employment growth at levels above that forecast by the ELR Scenario 2

(which has informed the Local Plan) and past trends. As such, no upward adjustment is required to the demographic-based housing need figure of 1,105 dpa to ensure that the needs of the local economy can be met;

- 4 Affordable Housing Need: The scale of affordable housing needs, when considered as a proportion of market housing delivery, implies higher levels of need well above 1,105 dpa. It is considered that to meet affordable housing needs in full (573 dpa), the OAHN range should be adjusted to 1,910 dpa @30% of overall delivery. It is, however, recognised that this level of delivery is likely to be unachievable for York. Given the significant affordable housing need identified in City of York Lichfields considers that a further 10% uplift would be appropriate in this instance and should be applied to the OAHN, resulting in a figure of 1,215 dpa.
 - 5 Student Housing Needs: household projections explicitly exclude the housing needs of **students living in communal establishments. Furthermore, Lichfields' critique of the projections clearly indicates that they do not adequately reflect the Universities' student growth targets.** It is calculated that meeting these growth needs would equate to around 1,346 dwellings over the 16-year Plan period, at an average of 84 dpa on top of the 1,215 dpa set out above (i.e. 1,299 dpa).
 - 6 Rounded, this equates to an OAHN of 1,300 dpa between 2017 and 2033 for the City of York. This is 22% higher than the MHCLG standard methodology figure of 1,069 dpa
 - 7 Shortfall of housing delivery 2012-2017: The Council is also making provision for past under-delivery between 2012 and 2017. Lichfields has serious concerns about how the **CoYC have calculated past housing delivery. Based on GL Hearn's OAHN of 790 dpa, and applying the MHCLG delivery figures, this suggests that an additional 153 dpa should be added on to the OAHN over the course of the 2017-2033 Plan period to address the backlog in full. If Lichfield's higher OAHN of 1,300 dpa is applied, this would result in a figure of 285 dpa to be factored on top.**
- 3.7 Using this figure (of 1,300 dpa plus the unmet need 2012-2017) would ensure compliance with the Framework by significantly boosting the supply of housing. It would also reflect the Framework, which seeks to ensure the planning system does everything it can to support sustainable development.
- 3.8 Lichfields has reviewed the delivery assumptions which the **Council's** housing trajectory is based upon. It is considered that the suggested lead-in times and delivery rates for a number of proposed allocations are unrealistic and not based on robust assumptions. Our review of the **Council's lead-in times** suggest that the overall conclusions do not reflect the full extent of the process from submitting a planning application to first completions on site. The lead-in times appear to be ambitious and do not provide a robust set of assumption to base the housing trajectory on. **Furthermore, whilst it is considered that the Council's approach to delivery rates** is a reasonable starting point, research undertaken by Lichfields demonstrates that build rate assumptions are more complex. Our analysis can be found at Appendix 3. This assessment also **raises concerns regarding further aspects of the Council's housing supply such as density** assumptions and the extent to which delivery from the windfall source can be relied upon. Overall, the assessment of the estimated housing supply by York Council identifies, even at a high level, an over-estimation of the supply both in the immediate 5-year period and for the Plan period.
- 3.9 Taylor Wimpey **has concerns regarding the Council's approach to calculating its five- year** housing land supply, including the assumptions which the housing trajectory is based upon. Taylor Wimpey therefore concludes that additional housing supply needs to be identified in

York to meet what is considered to be a shortfall in predicted delivery, particularly against a properly formulated OAN, for the Plan period.

Tests of Soundness

3.10 Taylor Wimpey consider that the above modifications fail to meet the following tests of soundness because:

- 1 It is not Positively Prepared: Based on Lichfields' analysis it is considered that the plan is not based on a robust OAHN or understanding of passed under delivery. Therefore, the plan is not positively prepared and will not meet the OAHN for the authority area. **The Council's current proposals will not seek to allocate sufficient housing to meet the identified OAHN and unmet need.**
- 2 It is not Justified: The proposed modification to the housing requirement is not justified as it is not based on a robust evidence and is not considered to be compliant with the Framework.
- 3 It is not Effective: In the absence of an identified supply of housing allocations which **would be sufficient to deliver the Council's OAHN identified through Lichfields' analysis**, there is a risk that the Local Plan will not be deliverable and sufficiently flexible to respond to change over the plan period. Furthermore, it is considered that the assumptions **which the Council's housing trajectory are not robust.**
- 4 It is not Consistent with National Policy: **The Council's currently identified OAHN** of 790 dwellings is not based on a robust evidence base and will not deliver sustainable development in accordance with the policies in the Framework. **The Council's housing trajectory** is not based on robust assumptions and therefore it is questionable if the Council has sufficient sites to demonstrate a five year housing supply or meet the housing requirement across the plan period.

Recommended Change

3.11 In order to address the conflicts identified above and ensure that the Local Plan is sound, it is considered that City of York Council should:

- 1 Revisit the evidence base which underpins the minimum housing requirement figure of 790 dwellings, taking on board Lichfields' **analysis which sets out that the Council's OAHN is 1,300 dpa plus the unmet need between 2012-2017 (285 dpa).**
- 2 Identify additional housing sites to meet the significant shortfall in housing need (between 2012 – 2017) and the higher annual requirement identified as part of the Lichfields' **analysis of the Council's housing evidence base.**
- 3 Revisit the delivery assumptions which the housing trajectory is based upon to ensure they **are robust and sufficient housing is identified to provide five years' worth of housing against** requirement, plus delivering sufficient homes to meet the housing requirement across the plan period.

3.12 **It is clear from analysis of the Council's evidence base that the approach to identifying an OAHN** is not compliant with the Framework. The Council are not planning to deliver a sufficient supply of housing to meet the districts OAHN as identified by Lichfields. Furthermore, there are doubts **that the housing trajectory is based on robust delivery assumptions and therefore the Council's** ability to deliver a five year housing land supply or meet the housing requirement across the plan period.

- 3.13 The Council should therefore revisit their housing requirement and also seek to identify additional land to meet the housing needs of the district. In order to ensure an overall strategy that is deliverable and sufficiently flexible to respond to change. This will ensure compliance with the Framework by significantly boosting the supply of housing.

4.0 **Modification PM39 – Policies Map Green Belt Change – Strensall Village**

Introduction

- 4.1 Modification PM39 proposes that the detailed inner Green Belt boundary around the village of Strensall should follow along Ox Carr Lane, placing all the land to the south of this within the Green Belt, as opposed to encompassing the Military Barracks and associated housing within the village envelope as presented on the policies map.
- 4.2 As part of the Proposed Modification consultation, the Council has produced an Addendum to **Topic Paper 1: Approach to York’s Green Belt. The TP1 Addendum is intended to provide** further clarity on the approach to defining the inner and outer Green Belt boundary and the exceptional circumstances within which allocations within the general extent of Green Belt have been made. This work brings together conclusions from previously published evidence and decision making.
- 4.3 The Council is proposing minor modifications to the Green Belt boundary depicted on the 2018 policies map, as part of the further work undertaken to produce the Addendum to Topic Paper 1 and as a result of the proposed modifications required by the updated Habitats Regulations Assessment.

Consideration of Modification

- 4.4 Taylor Wimpey objects to Modification PM39 as it considered that the proposed inner Green Belt Boundary around Strensall has not been properly assessed and the changes proposed by Modification PM39 fail to release land at Brecks Lane, Strensall from the Green Belt. Taylor Wimpey is concerned with the approach taken in the TP1 Addendum to identifying the inner Green Belt boundary around Strensall as it is considered that there is a lack of transparency as to how the findings within the document have resulted in the Green Belt boundaries identified.
- 4.5 The stated purpose of Section 4 of the TP1 Addendum is to set out how the Local Plan has defined land which needs to be kept permanently open in terms of the 5 purposes of Green Belt. The TP1 Addendum advises in Section 4 that preserving the setting and special character of York **should form the primary purpose of York’s Green Belt** but notes that consideration has been given to the other Green Belt purposes as part of the process. Figures 3 to 6 in the TP1 Addendum identify the areas of land which are considered to contribute to Green Belt purposes 1,2 3 and 4. In relation to land at Breck Lane, Strensall, the figures indicate the following:
- 1 Purpose 1: The site appears to lie just within the area that the Council considers would exacerbate urban sprawl (though it is not possible to fully confirm this given the small size and low image quality of the Figure)
 - 2 Purpose 2: The site lies outside of areas the Council considers are essential for preventing coalescence.
 - 3 Purpose 3: The site appears to lie within an area which the Council considers is necessary to safeguard the countryside from encroachment, on the basis that it lies within a green infrastructure corridor (though it is not possible to fully confirm this given the small size and low image quality of the Figure).
 - 4 **Purpose 4: the site is not within an area considered by the Council to be important to York’s special character and setting.**

- 4.6 With regard to Purpose 5, the TP1 Addendum notes that this purpose is achieved through the overall effect of the York Green Belt rather than the identification of particular parcels of land which must be kept permanently open. It states that variety of potential allocations, both close to the urban area and separate to it, have been identified so as to balance the need for growth and the ability of the Green Belt to promote regeneration in existing built up areas.
- 4.7 Based on the assessment in the TP1 Addendum, the only specific purposes that the Brecks Lane site appears to serve are Purpose 1 and Purpose 3,
- 4.8 With regard to Purpose 1, it is not clear why the information used to inform the impact upon this purpose has been used. The TP1 Addendum identifies all the land in York which does not currently have access to two or more of key services to inform land which is to be kept permanently open as Green Belt. The development of land on the edge of any settlement has the potential to result in sprawl and the usual barometer to assess sprawl is to consider how well contained the parcel is by the urban area and how strong the boundary is to restrict it from sprawl. The strategic approach taken by the Council is therefore considered to be flawed. For the reasons set out in this representations, the Brecks Lane site is well contained and has strong robust and defensible boundaries. It does not therefore represent part of a potentially continuous urban sprawl.
- 4.9 In term of Purpose 3, the identification of the site appears to be on the basis that it lies within a green infrastructure corridor and should therefore remain permanently open. However, it is not clear how this green infrastructure corridor has been defined. It is not shown on the Policies Map for the Local Plan Pre-Publication Draft or the Proposal Map for the Draft 'Local Plan' incorporating the 4th set of changes (April 2005). In any event, the presence of such a corridor does not necessarily mean that a site assists in safeguarding the countryside from encroachment.
- 4.10 When making such an assessment the normal approach is to consider the presence of a strong physical boundary and the extent of development which does not fall within an appropriate countryside use. With regard to this matter Taylor Wimpey notes that the Brecks Lane site is largely contained by development with a strong landscape boundary to the east, which would be further enhanced as part of any development proposals. As noted above, when making a reasoned judgement, it can be concluded that the site will not involve encroachment into the open countryside as it is divorced from the open countryside and it forms a logical small **extension to Strensall's urban area. It does not therefore form part of the open countryside but** relates to the urban area of Strensall.
- 4.11 In addition to the above concerns, it is not clear what weight has been given to each purpose and **there is no clear explanation as to how this has informed the Council's overall conclusions on the** strategic areas which need to be kept permanently open.
- 4.12 Figure 7 of the TP1 Addendum identifies those areas which have been identified as being strategically important to keep permanently open in the context of the 5 purposes of the Green Belt (the TP1 Addendum¹¹ notes that Figure 7 is a combination of Figures 3-6 which cover each of the Green Belt purposes individually). Figure 7 appears to show the Brecks Land site as lying within one of these strategically important areas. However, it not possible to positively confirm whether site falls within or outwith a strategically important area as the scale and detail of Figure 7 is not sufficient to make an accurate assessment. Larger scale versions of Figures 3-7 were requested from the Council but these have not been supplied. For the reasons set out above and in other parts of this representation, it is considered that the Brecks Lane site should be identified as lying outwith the strategically important areas.

¹¹ TP1 Addendum §4.42

- 4.13 The TP1 Addendum¹² notes that Figure 7 serves to explain the general extent of the York Green Belt and informs the analysis for determining the detailed inner and outer boundaries as outlined in Section 5 of the TP1 Addendum. However, it is not clear how this translates into the boundaries defined. For example, there are parts of Strensall which are identified as lying outside of the strategically important areas but which fall within the Green Belt proposed around the settlement.
- 4.14 Section 6 of the TP1 Addendum considers additional urban areas in the general extent of the Green Belt to determine if detailed Green Belt boundaries need to be established. The TP1 Addendum notes that where analysis determines that an urban area needs to be inset, the proposed boundary is based on the methodology set out in Section 5 of the TP1 Addendum. It draws a conclusion on whether an area should be included or inset from the general extent of the Green Belt. As part of this process, parts of the settlement of Strensall are proposed for exclusion from the Green Belt.
- 4.15 Whilst Taylor Wimpey welcomes the exclusion of the settlement of Strensall from the Green Belt it has concerns with the proposed inset boundary and considers that the approach taken to identifying the boundary is fundamentally flawed. Annex 4 of the TP1 Addendum provides a plan which identifies the proposed boundaries for Strensall. The boundary identified shows the Brecks Lane site as lying within the Green Belt, adjacent to the proposed boundary with the urban area. With regard to defining the proposed boundaries the TP1 Addendum¹³ states:
- “The proposed boundaries presented in Annex 4 (and summarised overleaf) are based on current built development and do not account for the need to release land/sites in accordance with accommodating identified needs for growth and setting a permanent Green Belt. Issues on exceptional circumstances and the sites these can be applied to are set out in sections 7 and 8”.***
- 4.16 Taylor Wimpey considers that the approach taken of identifying Green Belt boundaries and then attempting to retrofit allocations in afterwards is illogical. As the Council is aware that the release of Green Belt land is necessary, the whole point of defining Green Belt boundaries through this process should be to help identify land which no longer meets the Green Belt purposes and to help identify the most appropriate locations for Green Belt release. This process should have been undertaken prior to any allocations being identified in order to help inform what the most appropriate locations are.
- 4.17 The identification of a boundary based on current built development does not make any sense as this does not provide any opportunity to consider where boundaries could possibly be realigned to exclude areas which no longer serve Green Belt purposes. On this basis, there is no transparent logic or justification as to how the sites identified for allocation and their respective boundaries have been defined.
- 4.18 **The Council’s approach in which it has considered the suitability of sites in relation to Green Belt harm is also considered to be flawed.** The TP1 Addendum¹⁴ states:

¹² TP1 Addendum §4.42

¹³ TP1 Addendum §6.17

¹⁴ TP1 Addendum §8.6

“Table 2 identifies those sites which are considered to be the most suitable and sustainable as identified through the Local Plan site selection process and identified as causing the least harm to the green belt. Overall, the table includes 21 sites identified in the Local Plan (2018) that sit within the general extent of the York Green Belt, as described above and are all therefore considered to have some impact on the openness of Green Belt and on the 5 purposes set out in the NPPF. The sites identified provide sufficient land for 7,769 dwellings and 151,850 sqm of employment floorspace”.

- 4.19 The issue of harm of a potential development to the Green Belt is normally considered through a planning application, where development is proposed within an existing Green Belt boundary (i.e. the site is located in the Green Belt so the harm upon it needs to be considered in accordance with the Framework). When identifying land for Green Belt release and allocation through the Local Plan process this approach is not taken. Instead, a thorough assessment to the 5 purposes of the Green Belt is normally undertaken and the suitability of land for release is assessed on this basis. The contribution of the Green Belt to the 5 purposes is normally balanced with other considerations such as, the overall distribution strategy, sustainability, accessibility etc. to identify the most appropriate sites for release and allocation. This again illustrates how the Council is seeking to retrofit allocated sites into the Green Belt assessment process.
- 4.20 Taylor Wimpey also notes that whilst the allocated sites are individually assessed in the TP1 Addendum (Annex 5) against the Green Belt Purposes, there is no comparison of the allocated sites with other areas of Green Belt land so it is not possible to confirm whether they are the most appropriate locations for development.

Safeguarded Land

- 4.21 Representations promoting the Brecks Lane site at previous stages of the Local Plan consultation have established a case as to why safeguarded land should be identified in York.
- 4.22 The Framework¹⁵ is clear that local authorities should consider Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. It states that authorities should identify areas of **‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term** development needs stretching well beyond the plan period. However, the Council has failed to consider the release of safeguarded land as part of the Proposed Modifications consultation and in the additional Green Belt work undertaken in the TP1 Addendum. With regard to this matter the TP1 Addendum¹⁶ states:

“Several of the strategic sites identified in the submitted Local Plan have anticipated build out times beyond the fifteen year trajectory included within the plan; this coupled with a small windfall allowance and an approach to Green Belt predicated on boundaries enduring for a minimum of 20 years (5 years beyond the Plan period) mean that it is no longer necessary to designate safeguarded land, although some of the site boundaries may include land which was previously identified in his way”.

- 4.23 The now aborted YLP-PD identified a reserve of safeguarded land to ensure that the Green Belt boundary was capable of enduring beyond the plan period. This approach is entirely consistent with national guidance. Taylor Wimpey are therefore concerned that the Local Plan no longer

¹⁵ The Framework §§83 and 85

¹⁶ TP1 Addendum §5.64

designates safeguarded land, provides no justification for this approach, and relies on strategic sites delivering beyond the plan period.

4.24 The identification of safeguarded land is considered particularly important as the Local Plan will set detailed Green Belt boundaries for the first time and an appropriate and sound strategy is therefore required to enable flexibility beyond the plan period. Taylor Wimpey consider that safeguarded land is required in the City to provide a degree of permanence to the Green Belt boundary and avoid the need for future review. It would also provide flexibility and allow land to be brought forward quickly without a fundamental review of the whole Local Plan if allocated sites were unable to deliver the quantum of development envisaged. This is particularly important when considering the complex nature of some of the sites that are proposed for allocation in the LPP e.g. Land to the West of Elvington Lane, where deliverability is uncertain due to issues including land ownership, funding and viability.

4.25 Taylor Wimpey therefore considers that the establishment of suitable boundaries for safeguarded sites should have been assessed as part of the further work undertaken in the TP1 Addendum. This is the only way to ensure strong and enduring Green Belt boundaries.

Tests of Soundness

4.26 Taylor Wimpey consider that Modification PM39 fails to meet the following tests of soundness because:

- 1 It is not Positively Prepared: The identification of a Green Belt boundary based on current built development does not make any sense as this does not provide any opportunity to consider where boundaries could possibly be realigned to exclude areas which no longer serve Green Belt purposes. The approach taken of identifying Green Belt boundaries and then attempting to retrofit allocations in afterwards is illogical.
- 2 It is not Justified: It is not clear what weight has been given to each purpose and there is **no clear explanation as to how this has informed the Council's overall conclusions on the strategic areas which need to be kept permanently open.** There is no transparent logic or justification as to how the sites identified for allocation and their respective boundaries have been defined. Whilst the allocated sites are individually assessed in the TP1 Addendum (Annex 5) against the Green Belt Purposes, there is no comparison of the allocated sites with other areas of Green Belt land so it is not possible to confirm whether they are the most appropriate locations for development. There is no clear evidence to demonstrate why safeguarded land has not been identified to meet need beyond the plan period.
- 3 It is not Effective: In the absence of identifying additional land outwith the Green Belt boundary, and allocating land in sustainable locations to meet development needs, there is a risk that the Local Plan will not be deliverable over its period.
- 4 It is not Consistent with National Policy: The identification of additional land outwith the Green belt boundary in sustainable locations is necessary in order to meet the delivery of sustainable development in accordance with the policies in the Framework.

Recommended Change

4.27 In order to address the conflicts identified above and ensure that the Local Plan is sound, it is considered that City of York Council should:

- 1 Review the Green Belt evidence to address the issues identified above.

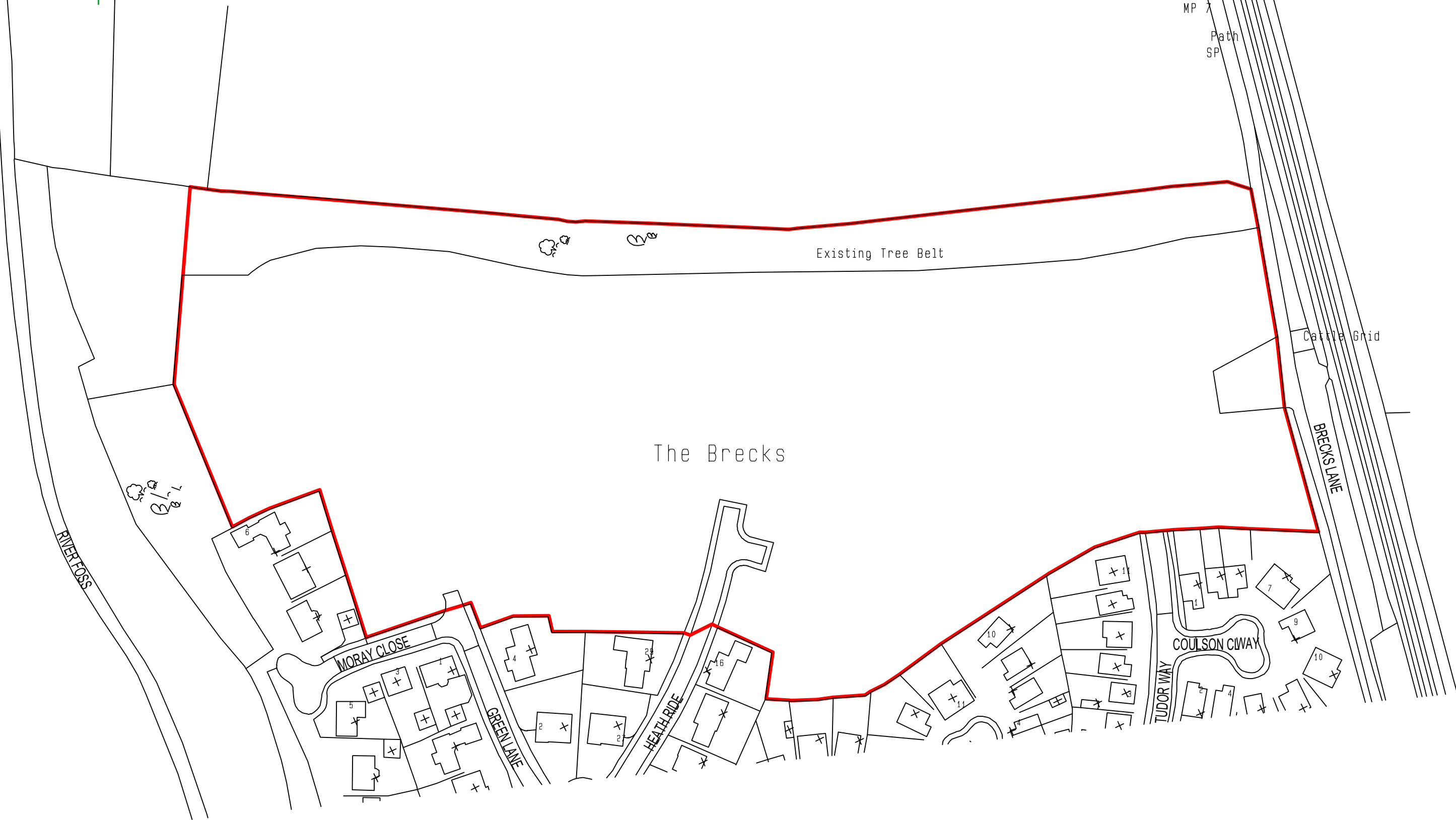
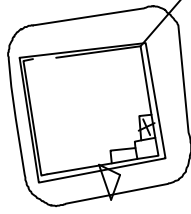
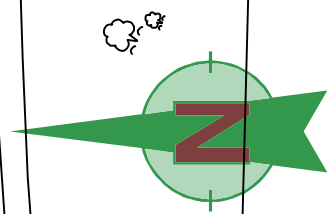
- 2 Define the boundary of the Green Belt around Strensall such that land at Brecks Lane is excluded from The Green Belt and allocated for residential development on the Local Plan Proposals Map.
- 3 The Brecks Lane site should be identified as Safeguarded Land on the Local Plan Proposals Map if it is not allocated for development.

4.28 The Council should identify additional land to meet the housing needs of the community and define the Green Belt boundary accordingly. These sites should be able to deliver early in the **plan period. This is the only approach that will deliver a ‘sound’ plan and enable the much needed investment in new housing to meet the community’s needs. The** identification of a portfolio of small site allocations (e.g. up to 250 dwellings) around existing settlements and the main urban area would assist in meeting any shortfall created by the delay in large sites delivering dwellings early in the plan period.

4.29 As demonstrated in these representations, the Brecks Lane site should not be included within the identified Green Belt boundary, as it does not serve a Green Belt function, and should be allocated for residential development to help the Council meet its housing requirement.

4.30 Even if the site is not allocated it should be identified as Safeguarded Land for future development.

Appendix 1 **Land at Brecks Lane, Strensall**



MP 7
Path
SP

Existing Tree Belt

The Brecks

Cattle Grid

BRECKS LANE

RIVER FOSS

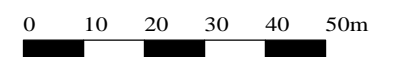
MORAY CLOSE

GREEN LANE

HEATH RIDGE

TUDOR WAY

COULSON CWAY



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CLIENT:
LINDEN HOMES NORTH

PROJECT:
Development at Brecks Lane, Strensall
 DRAWING TITLE:
Location Plan

SCALE: 1 : 1250 @ A3		DATE: September 2013	
DRAWN: KLW	CHECKED: -	DWG NO. 3585/12	REV. -

ALL DIMENSIONS TO BE CHECKED ON SITE. DISCREPANCIES, AMBIGUITIES AND/OR OMISSIONS BETWEEN THIS DRAWING AND INFORMATION GIVEN ELSEWHERE MUST BE REPORTED TO THIS OFFICE AND CLARIFICATION SOUGHT BEFORE PROCEEDING

Appendix 2 **Brecks Lane Site Layout Plan**

Appendix 3 **Housing Technical Report**

City of York Local Plan

Proposed Modifications Version

Representations on Housing Matters

Taylor Wimpey; Wakeford Properties; Persimmon Homes; Bellway Homes

July 2019



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1.0 Introduction

- 1.1 This statement is prepared on behalf of four different and separate participants who have jointly instructed Lichfields to represent them on matters of housing need. The participants are Taylor Wimpey, Persimmon Homes, Wakeford Properties and Bellway Homes. Each has their own distinct interests in the City and have submitted separate responses on other matters, but present the following shared position on housing need.
- 1.2 The assessment of York’s housing need in this statement forms part of the above participant’s response to the York Local Plan [YLP] Proposed Modifications Version (June 2019) covering Local Housing Need, housing land supply and affordable housing. They are submitted to City of York Council [CYC] for consideration in the formulation of its new Local Plan for the City.
- 1.3 In particular, two main issues are analysed:
- 1 A review of CYC’s existing evidence on housing needs and establishing the scale of need and demand for market/affordable housing in the City; and,
 - 2 An appraisal of the housing trajectory and five-year land supply position which underpins CYC’s Plan.

City of York Council’s Local Plan Proposed Modifications (June 2019)

- 1.4 A review of the Objectively Assessed Housing Need [OAHN] was undertaken on behalf of CYC by GL Hearn in January 2019 (*The Housing Needs Update report*), which supersedes the previous SHMA Update (2017). This report advised that in light of the latest set of 2016-based Sub-National Household Projections [SNHP] in September 2018, York’s OAN has fallen from 867 dwellings per annum [dpa] to 790 dpa.
- 1.5 On the basis of this evidence, the Council considered that under the transitional arrangements of the 2012 NPPF and the requirements of the National Planning Practice Guidance [the Practice Guidance] in relation to the assessment of housing need, it was justified in making minor modifications to its submitted Plan as a result of the updated OAHN.
- 1.6 These modifications include an update to Figures 5.1 and 5.2 of the Plan – the housing trajectory and figure 6 of the Strategic Housing Land Availability Assessment (SHLAA) which provides the detailed housing trajectory. Policy SS1: *Delivering Sustainable Growth for York*, has been modified to state that the Council will “*deliver a minimum annual provision of 790 new dwellings over the plan period to 2032/33 and post plan period to 2037/38*”.
- 1.7 Furthermore, paragraph 3.3 of the accompanying explanation to Policy SS1 is now revised to state that:
- “Technical work has been carried out by GL Hearn in the Strategic Housing Market Assessment Update (2017). This work has updated the demographic baseline for York based on the July 2016 household projections to ~~867~~ 790 per annum. Following consideration of the outcomes of this work, the Council aims to meet an objectively assessed housing need of ~~867~~ 790 new dwellings per annum for the plan period to 2032/33, including any shortfall in housing provision against this need from the period 2012 to 2017, and for the post plan period to 2037/38.”*

- 1.8 Our review concludes that on the basis of the approach taken to reaching the 790 dpa housing requirement identified within the City of York Housing Needs Update (January 2019) (“the 2019 HNU”), and prior iterations of that study, that this housing requirement fails to meet the full OAHN, which is significantly higher than the Council has estimated.
- 1.9 Furthermore, we consider that the Plan would fail to make appropriate provision for sufficient housing to sustainably deliver, in a timely manner, housing in line with the City’s full OAHN, with further site allocations required within this Plan in order to ensure an overall strategy that is deliverable and sufficiently flexible to respond to change.

Report Structure

- 1.10 The report is structured into the following sections:
- **Section 2.0** –sets out the housing policy context at a national and local level;
 - **Section 3.0** – reviews the robustness of the Council’s evidence on housing need within the City, and whether the Council is seeking to meet its OAHN;
 - **Section 4.0** – identifies a new OAHN;
 - **Section 5.0** – considers the integration of student housing needs;
 - **Section 6.0** – reviews the Council’s approach to factoring in backlog;
 - **Section 7.0** - provides a summary and conclusion on the City of York’s housing need;
 - **Section 8.0** –reviews the Council’s housing trajectory and five-year housing land supply position [5YHLS] which underpin the Plan’s Proposed Modifications, in respect of realistic and reasonable lead-in times and build-out rates, including presenting a revised trajectory; and
 - **Section 9.0** –provides a summary and overall conclusion on the whether the evidence underpinning the Plan is sound, in respect of the need for both market and affordable homes and the housing trajectory, and provides recommendations in respect of these matters.

2.0 **Housing Need**

Introduction

2.1 This section sets out the requirements of the Framework and the Practice Guidance in objectively assessing housing needs. This is in the context that the Council's Local Plan was submitted during the transitional arrangements for the 2019 National Planning Policy Framework [NPPF]. That said, the standard method for calculating housing need set out in the NPPF (and set out in more detail in the revised 2019 Practice Guidance), provides relevant context for the direction of change the Government has moved towards, and the unwavering emphasis of seeking to substantially boost the supply of housing to attain an overall national target of 300,000 dwellings per year.

2.2 This will provide the benchmark against which the 2019 HNA will be reviewed, to ensure the necessary requirements are met. In addition, relevant High Court judgments have been referenced to set out the requirements of an OAHN calculation in a legal context.

National Planning Policy Framework

2.3 The 2012 NPPF outlines that local planning authorities [LPAs] should positively seek opportunities to meet the development needs of their area (paragraph 14). It adds that, in order to “boost significantly” the supply of housing, they should “use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the framework...” (paragraph 47)

2.4 The NPPF (paragraph 159) specifies the evidence required to objectively define housing needs within an area, setting out that LPAs should:

"Prepare a Strategic Housing Market Assessment to assess their full housing needs... identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

- *Meets household and population projections, taking account of migration and demographic change;*
- *Addresses the needs for all types of housing, including affordable housing...; and*

Caters for housing demand and the scale of housing supply necessary to meet this demand."

2019 NPPF

2.5 The Revised Framework was published in February 2018. It has an unequivocal emphasis on housing, with the introduction to the 2018 consultation proposals clarifying that the country needs radical, lasting reform that will allow more homes to be built, with the intention of reaching 300,000 net additional homes a year.

2.6 The 2019 NPPF states that to support the Government's objective of “significantly boosting the supply of homes”, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay [S59].

2.7 In particular:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”. [S60]

2.8 The revision also makes clear that when identifying the housing need, policies should also break the need down by size, type and tenure of homes required for different groups in the community (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes) [S61].

2.9 Paragraphs 67 - 76 also set out how Councils should identify and maintain a five-year supply of housing against their housing requirement.

2.10 In terms of the weight that can be attached to this key policy document, it is accepted that paragraph 214 to Annex 1 of the NPPF states that the policies in the previous Framework will apply for the purposes of examining plans, where those plans were submitted on or before the 24th January 2019.

2.11 However, the 2019 NPPF remains a useful indicator of the direction of travel, not least with the approach to be taken to defining housing need, which has already been the subject of an earlier consultation (*‘Planning for the right homes in the right places’*, September 2017), to which MHCLG published a summary of consultation responses and its view on the way forward in March 2018.

Planning Practice Guidance

2.12 The Planning Practice Guidance [PPG] contains a section providing guidance on housing and economic development needs assessments. It identifies that whilst there is no one methodological approach, an OAHN should fulfil the following criteria:

- be proportionate and not consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur (ID: 2a-003);
- be based on facts and unbiased evidence. Constraints should not be applied to the overall assessment of need (ID: 2a-004);
- utilise household projections published by the Department for Communities and Local Government as the starting point estimate of overall housing need (ID: 2a-015);
- consider sensitivity testing, specific to local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates (ID: 2a-017); and
- take account of employment trends (ID: 2a-018), appropriate market signals including market indicators of the balance between the demand for and supply of dwellings (ID: 2a-019) and affordable housing needs (ID: 2a-029).

2019 Planning Practice Guidance

2.13 Following on from the revisions to the Framework, on 13th September 2018 MHCLG

published its revised PPG on Housing and economic land availability assessment covering changes to the 5YHLS approach, whilst on 20th March 2019 MHCLG updated its Housing and economic needs assessment to factor in the calculation of Local Housing Need via the standard methodology.

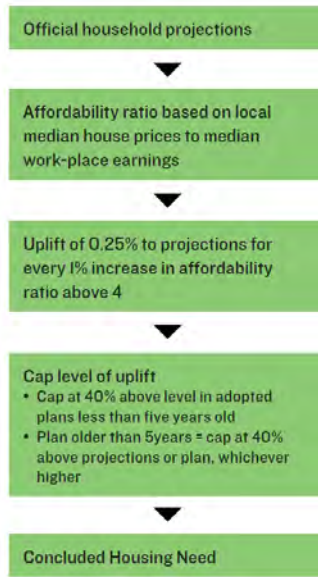
- 2.14 Regarding housing delivery, the PPG sets out how local authorities should identify and maintain a 5-year supply of specific deliverable sites, bringing the Guidance into line with recent Ministerial statements and High Court Judgements. In particular, it clarifies that along with older peoples’ housing, all student accommodation can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market.
- 2.15 Furthermore, LPAs should deal with deficits or shortfalls against planned requirements within the first 5 years of the plan period (i.e. the ‘Sedgefield’ approach to backlog).
- 2.16 In terms of the Local Housing Need [LHN] assessment, this takes forward the approach set out in CLG’s September 2017 consultation on “*Planning for the right homes in the Right Places*”. The new approach to a standard method for calculating local housing need, including transitional arrangements, is set out and as before, consists of three components.
- 2.17 This uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply¹. This takes an average of the household projections over a 10-year period and adjusts them based on the affordability of the area. A cap may be applied which limits the increase, depending on the current status of relevant policies for housing.
- 2.18 The PPG states that:
“The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes.”
- 2.19 If an authority uses a different method for calculating housing need the PPG sets out how this should be tested at examination:
“Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.”
“Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination.”³
- 2.20 The various stages are set out in Figure 1.

¹ 2a-002-20190220 [CD/021]

² 2a-002-20190220

³ 2a-015-20190220[CD/021]

Figure 1 Methodology for determination of LHN



Source: Lichfields

2.21 Applying this revised approach to the standard methodology would result in a LHN figure of **1,069 dpa** for the City of York. This represents the minimum number of homes needed per year as set out in paragraph 60 of the revised Framework (February 2019).

2.22 This is calculated using the 2014-based household projections for 2019-2029, which equates to household growth of 820 per annum (8,198 over the 10-year period), plus a market signals uplift of 30.4%. This latter figure has been generated as follows, based on the most recent (April 2019) affordability ratio data for the City of York:

- Median local workplace-based affordability ratio (2019) = 8.86
- deduct 4 = 4.86
- divide by 4 = 1.215
- multiply by 0.25 = 0.304 (30.4%).

2.23 No cap is applied as the capped figure is greater than the minimum LHN figure.

Relevant Caselaw

2.24 There have been several key legal judgments which provide clarity on interpreting the NPPF and PPG in terms of how to address the issue of affordable housing need in the context of arriving at a concluded figure for OAHN:

- 1 'Satnam Millennium Limited and Warrington Borough Council [2015] EWHC 370' referred to as "Satnam";
- 2 'Kings Lynn and West Norfolk Borough Council v Secretary of State for Communities and Local Government [2015] EWHC 2464' referred to as "Kings Lynn";
- 3 'Barker Mill Estates Trustees v Test Valley BC & Secretary of State for Communities and Local Government [2016] EWHC 3028 (Admin)' referred to as "Barker Mill"; and

- 4 ‘Jelson Ltd. v Secretary of State for Communities and Local Government, Hinckley and Bosworth Borough Council [2018] EWCA Civ 24’ referred to as “Hinckley and Bosworth”.

Satnam

2.25 Satnam highlights the importance of considering affordable housing needs as part of – and not separate to – concluding on OAHN. The decision found that the adopted OAHN figure within the Warrington Local Plan was not in compliance with policy in respect of affordable housing because (as set out in paragraph 43) the assessed need for affordable housing was never expressed or included as part of OAHN. The judgment found that the “proper exercise” had not been undertaken, namely:

“(a) having identified the OAHN for affordable housing, that should then be considered in the context of its likely delivery as a proportion of mixed market/affordable housing development; an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes;

(b) the Local Plan should then meet the OAHN for affordable housing, subject only to the constraints referred to in NPPF, paragraphs 14 and 47.”

2.26 In summary, this judgment establishes that OAHN has to include an assessment of full affordable housing needs and is not a ‘policy-on’ judgement in determining the housing requirement.

Kings Lynn

2.27 Kings Lynn helps establish how full affordable housing needs should be addressed as part of an OAHN calculation. The judgment identifies that it is the function of a SHMA to address the needs for all types of housing including affordable, but not specifically to meet all these needs in full.

2.28 The relevant passage on this is to be found in paragraphs 35 to 36 of the judgment:

“At the second stage described by the second sub-bullet point in paragraph 159, the needs for types and tenures of housing should be addressed. That includes the assessment of the need for affordable housing as well as different forms of housing required to meet the needs of all parts of the community. Again, the PPG provides guidance as to how this stage of the assessment should be conducted, including in some detail how the gross unmet need for affordable housing should be calculated. The Framework makes clear these needs should be addressed in determining the FOAHN, but neither the Framework nor the PPG suggest that they have to be met in full when determining that FOAHN. This is no doubt because in practice very often the calculation of unmet affordable housing need will produce a figure which the planning authority has little or no prospect of delivering in practice. That is because the vast majority of delivery will occur as a proportion of open-market schemes and is therefore dependent for its delivery upon market housing being developed. It is no doubt for this reason that the PPG observes at paragraph ID 2a-208-20140306 as follows:

“The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered

by market housing led developments. An increase in total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.'

This consideration of an increase to help deliver the required number of affordable homes, rather than an instruction that the requirement be met in total, is consistent with the policy in paragraph 159 of the Framework requiring that the SHMA "addresses" these needs in determining the FOAHN. They should have an important influence increasing the derived FOAHN since they are significant factors in providing for housing needs within an area." (Lichfields' emphasis)

- 2.29 The judgment is clear that the correct method for considering the amount of housing required to meet full affordable housing needs is to consider the quantum of market housing needed to deliver full affordable housing needs (at a given percentage). However, as the judgment sets out, this can lead to an OAHN figure which is so large that an LPA would have "little or no prospect of delivering [it] in practice". Therefore, it is clear from Kings Lynn that although it may not be reasonable and therefore should not be expected that the OAHN will include affordable housing needs in full, an uplift or similar consideration of how affordable needs can be 'addressed' is necessary as part of the OAHN calculation. This reflects paragraph 159 of the NPPF.

Barker Mill

- 2.30 The Barker Mill High Court judgment considered uplifts to OAHN to address affordable housing need in the context of a challenge to a Local Plan. The judgment, in the context of a Local Plan process, placed consideration of an uplift for affordable housing into the second of a two-stage process, the first being calculation of OAHN and the second being a 'policy-on' adjustment (i.e. one that is made through the Local Plan process and thus not part of the OAHN). There is a tension between the findings in this judgment and Kings Lynn.

Hinckley and Bosworth

- 2.31 This judgment is relevant in the context of the findings of the above Barker Mill judgment. In short, in considering the refusal of planning permission for housing, the Inspector in this case, as a matter of planning judgment, accepted the need for affordable housing to make up a necessary component of OAHN for housing in the council's area, or in the context of the Barker Mill judgment, as part of the first stage calculation of OAHN.

"This case is not analogous to Hunston Properties Ltd. and Gallagher Estates Ltd., where the decision-maker had adopted a level of housing need constrained by policy considerations – so called "policy-on" factors, as they were referred to in Gallagher Estates Ltd.. As Mr Phillipot and Ms Osmund-Smith submitted, the figure of 450 dwellings per annum identified by the inspector as the upper end of her range was not, in fact, a "constrained" figure. In her view, as a matter of planning judgment, it sufficiently embraced the need for affordable housing as a necessary component of the "full, objectively assessed needs" for housing in the council's area. It was the result not of a policy-driven subtraction from the figure of 375 dwellings per annum at the lower end of her range – the figure based on "demographic-led household projections" – but of an appropriate addition to that figure to ensure that the need for affordable housing was not omitted or understated. As the inspector clearly appreciated, a simple addition of the figures of 375 dwellings per annum in the

column headed "Demographic-Led Household Projections to 2031" in Table 84 of the SHMA and 248 dwellings per annum in the column headed "Affordable Housing Need per Annum" would have been inappropriate. That would have been, to some degree, double-counting. Planning judgment was required in gauging a suitable uplift to take account of the need for affordable housing, without either understating or overstating that need. The inspector grasped that. She exercised her planning judgment accordingly, doing the best she could on the evidence before her." (para 36).

- 2.32 It is also worth noting in this regard that this judgment makes the following comment regarding the Planning Advisory Service (PAS) Technical Advice Note which is sometimes cited at Local Plan Examinations as a reason for excluding affordable housing as a policy-off in terms of OAHN:

"This is not an official document and the relevant paragraphs cited do appear not to be consistent with case law... It would, of course, have been better had the Inspector either not referred to the Advice at all or recognised that it was (at least arguably) inconsistent with case law."

Housing Need Local Policy Context

- 2.33 Before setting out a critique of CYC's housing OAHN evidence base, it is important to recognise that the Council has never had an adopted Local Plan for the City (under the 1971 Act, the 1990 Act or the 2004 Act) and progress on the current Local Plan has been, it is not unfair to say, glacial.
- 2.34 The development plan for York comprises two policies⁴ and the Key Diagram of the partially revoked Yorkshire and Humber Regional Strategy (2008) [YHRS]. There is no adopted Local Plan for York that forms part of the development plan. Instead, there is a long history of failed attempts to produce an adopted Local Plan.
- 2.35 The Council published the 'York Local Plan - Preferred Options' document for consultation in summer 2013, followed by a 'Further Sites' consultation for six weeks in summer 2014, which included potential new sites and changes to the boundaries of some of the sites originally identified. Following these consultations, a 'Publication Draft Local Plan and Proposals Map' was considered by the Local Plan Working Group [LPWG] and by Cabinet in September 2014⁵. With the intention of progressing a Framework compliant Local Plan, the Cabinet resolved to carry through the LPWG's recommendations and approve the Local Plan Publication Draft for public consultation, subject to amendments circulated at the Cabinet meeting and to instruct officers to report back following the consultation with a recommendation on whether it would be appropriate to submit the Publication Draft for public examination.
- 2.36 However, at the Full Council on 9th October 2014⁶ a resolution was made to halt the public consultation on the Local Plan Publication Draft in order to reassess objectively assessed housing requirements. The resolution also instructed officers to produce a report on the housing trajectory to be brought back to the next meeting of the LPWG in November 2014 along with the relevant background reports. The intention was for the

⁴ Both relating to Green Belt, requiring its inner boundaries to be defined in a plan and confirming that the general extent is about 6 miles out from the City centre

⁵ Cabinet Meeting Thursday 25 September 2014 - Minutes

⁶ Resolutions and proceedings of the Meeting of the City of York Council held in Guildhall, York on Thursday, 9th October 2014

report to allow the LPWG to agree an accurate analysis of the housing trajectory that is objective, evidence based and deliverable. The analysis was to be used to “*inform housing allocations and a new proposed Local Plan to be brought back to the next LPWG for discussion and recommendation to Cabinet in November.*”

2.37

The Council published the following ‘further work’ on the Local Plan relating to housing needs after the Full Council resolution to halt the Publication Draft Local Plan in 2014:

- 1 In December 2014, the LPWG considered a report on ‘*Housing Requirements in York*’ which was based on two background documents produced by Arup⁷. The report set out four different housing requirement figures that were considered sound against the evidence base and three options for progressing the work on housing requirements. The LPWG members agreed a housing requirement figure of 926dpa⁸;
- 2 In September 2015 the LPWG considered an update on the ‘*Objective Assessment of Housing Need*’ [OAHN] report produced by Arup⁹ and a report on ‘*Economic Growth*’¹⁰. The Arup report concluded that the housing ‘requirement’ should be in the range of 817 dwellings per annum [dpa] to 854dpa between 2012 and 2031. The LPWG’s recommendations were that the Executive Committee note the Arup OAHN report and endorse further work, including an evaluation of any spatial and delivery implications, on two scenarios for economic growth that would be reported back to the LPWG in due course;
- 3 In Autumn 2015 the Council commissioned GL Hearn jointly with Ryedale, Hambleton and the North York Moors National Park Authority to undertake a Strategic Housing Market assessment [SHMA]¹¹. This study aimed to provide a clear understanding of housing needs in the City of York area. The SHMA was published as part of a suite of documents for the LPWG meeting on 27th June 2016. It concluded that the OAHN for the City of York was in the order of 841dpa.
- 4 On the 25th May 2016 ONS published a new set of (2014-based) sub national population projections [SNPP]. These projections were published too late in the SHMA process to be incorporated into the main document. However, in June 2016 GL Hearn produced an Addendum¹² to the main SHMA report which briefly reviewed key aspects of the projections and concluded that the latest (higher) SNPP suggested a need for some 898dpa between 2012 and 2032. However due to concerns over the historic growth within the student population, the Addendum settled on a wider OAHN range of 706dpa - 898dpa, and therefore the Council considered that it did not need to move away from the previous 841dpa figure.
- 5 DCLG published updated 2014-based sub-national household projections [SNHP] in July 2016. GL Hearn was asked by City of York Council to update the SHMA to take account of these new figures and to assess the representations received through the Preferred Sites Consultation [PSC] relating to OAN. The GL Hearn SHMA Addendum Update (May 2017) subsequently updated the demographic starting point for York based on these latest household projections. The 2014-based SNHP increases the demographic starting point from 783 dpa (in the 2016 SHMA) to 867 dpa. In their Update, GL Hearn then applied a 10% uplift to the 867 dpa starting point to account for market signals and affordable housing need and identifies a

⁷ Assessment of the Evidence on Housing Requirements in York (Arup, May 2013) & Housing Requirements in York: Evidence on Housing Requirements in York: 2014 Update (Arup, September 2014)

⁸ Local Plan Working Group 17 December 2014 - Minutes

⁹ Evidence on Housing Requirements in York: 2015 Update – Arup (August 2015)

¹⁰ York Economic Forecasts – Oxford Economics (May 2015)

¹¹ GL Hearn (June 2016): City of York Council Strategic Housing Market Assessment

¹² GL Hearn (June 2016): City of York Council Strategic Housing Market Assessment - Addendum

resultant housing need of 953 dpa. However, a cover sheet to GL Hearn’s Update, entitled ‘Introduction and Context to objective Assessment of Housing Need’ was inserted at the front of this document by the Council. This states that 867 dpa is the relevant baseline demographic figure for the 15-year period of the plan (2032/33). The Council rejected the 953 dpa figure on the basis that GL Hearn’s conclusions stating:

“...Hearn’s conclusions were speculative and arbitrary, rely too heavily on recent short-term unrepresentative trends and attach little or no weight to the special character and setting of York and other environmental considerations.”

2.38 As a result of this approach, the February 2018 City of York Publication Draft stated in Policy SS1: Delivering Sustainable Growth for York, the intention to:

“Deliver a minimum annual provision of 867 new dwellings over the plan period to 2032/33 and post plan period to 2037/38.”

2.39 The supporting text to this policy makes no mention of the 953 dpa OAHN figure, but instead claims that 867 dpa is “an objectively assessed housing need” [S3.3].

2.40 To bring this up to date, and as set out above, the Council has now revised the OAHN down even further in light of GL Hearn’s January 2019 HNA, which (based on the latest 2016-based SNHP) recommends a housing need figure of **790 dpa**.

2.41 Lichfields has submitted representations on behalf of housebuilders to the various stages of the York Local Plan formulation as and when the OAHN has been updated over the past 3 years. Our most recent representation, made on behalf of a consortium of housebuilders in March 2018, concluded that the OAHN should be increased to 1,150 dpa based on the 2014-based SNHP, with accelerated headship rates, a market signals uplift of 20% and a further 10% uplift to address a critical shortfall of affordable housing.

2.42 The remainder of this section provides an overview of the findings of the latest 2019 HNU.

Overview of the City of York HNU

2.43 The stated purpose of GL Hearn’s Housing Needs Update [HNU] is to review the housing need in York taking into account of the latest demographic information. In particular, it reviews the impact of the 2016-based SNPP, equivalent 2016-based SNHP, and the 2017 Mid-Year Estimates. The analysis models housing need from 2012-37 to be consistent with the Local Plan, although because there is a known population for 2017 the data up to this point is fixed.

2.44 The HNU also reviews the latest evidence on market signals within the City. The report states that this is not a full trend-based analysis but rather a snapshot of the latest evidence to be read in conjunction with the full SHMA document. As such, the report does not revisit the affordable housing need for the City, nor does it update analysis on the mix of housing required or the needs for specific groups.

2.45 The report [Table 2] finds that over the 2016-39 period, the 2016-based SNPP projects an increase in population of around 17,622 people (8.5%) in York. This is significantly lower than the 2014-based SNPP (29,622), which represents a huge difference of 12,000 residents.

2.46 The reason for this is considered by GL Hearn to be a combination of 3 factors that are reflected in the 2016 National Population Projections – a substantial fall in (net)

international migration; a fall in fertility rates; and a reduction in the life expectancy of the so-called ‘golden cohort’ born between 1923 and 1938.

- 2.47 GL Hearn concludes that “*given the more recent trend of falling rates the 2016 based projections loos to reflect this to a greater extent than the 2014-based projections which show an immediate and significant improvement which is not founded on the most recent trends*” [paragraph 2.7].
- 2.48 The analysis models a range of demographic scenarios, including 2017 MYE population data and 10-year migration trends. The growth in population ranges from just 24,036 under the latest 2016-based SNPP between 2012 and 2037, to 36,348 using the 2014-based SNPP. The 10-year migration scenario sites within this range, at +26,078.
- 2.49 GL Hearn examines the household formation rates that underpin the latest round of 2016-based household projections. They highlight the fact that concerns have been raised regarding their robustness:

“The criticism mostly stems from the fact that the new projections do not have the ability to meet the Government’s housing target of 300,000 homes per annum once the standard methodology is applied to them.” [paragraph 2.18]
- 2.50 GL Hearn notes that by focussing on shorter term trends ONS have effectively ‘locked in’ deteriorations in affordability and subsequently household formation rates particularly within younger age groups in that time.
- 2.51 The analysis [S2.28] finds that by applying the headship rates within the 2014-based SNHP the level of housing need would be 629 dpa, incorporating a 3% allowance for vacancy/second homes – this is c.30% higher than the figure (484 dpa) derived in the HNU for the main demographic-based projection. The part return to previous household formation trends for younger age cohorts (linking to the 2014-based SNHP) increases this still further, to 679 dpa.

Table 1 Projected Household Growth 2012-32 - Range of demographic based scenarios

	Change in households	Dwellings (per annum)
2016-based SNHP HRRs	11,744	484
2014-based SNHP HRRs	15,256	629
Part Return to trend	16,492	679

Source: GL Hearn (January 2019): City of York Housing Need Update, Table 6

- 2.52 Moving on, GL Hearn models a series of economic growth forecasts, settling on 650 jobs per annum as this is considered to align with the ELR Update. In this regard, they conclude that the level of housing associated with the economic growth projections in the ELR Update (September 2017) which project growth of 650 jobs annually between 2014-31. Using the OBR economic activity rates and keeping unemployment rates, double jobbing and commuting ratios constant, this equates to a need for 590 dpa based on the 2016-based HRRs, rising to 735 dpa using the 2014-based HRRs and up to **790 dpa** using part-return to trend HRRs.

Market Signals

- 2.53 With regard to market signals, the HNU notes that
 - Lower quartile house prices in York exceed that of England by £30,000 despite having a similar overall median house price. “*Relatively higher values within a*

lower quartile housing range suggests that those with lower incomes (such as first-time buyers) feel greater housing pressure and are less likely to be able to afford a property” [paragraph 4.2].

- The gap of median house price growth between York and North Yorkshire has widened from 10 years ago. Since 2008 the rate of change for York has been 1.25, similar to the national growth of 1.3 [4.10].
- Median rental values in York are £745, £70 higher than the rest of England and £220 higher than Yorkshire and the Humber region [4.13]. LQ rental price growth has increased by 14% over the past 5 years, compared to 11% nationally [4.14];
- *“The data demonstrated that rental housing has overall become more unaffordable in the past 5 years, but increasingly so amongst lower-value properties. This could be linked to a lack of affordability in the purchase market forcing a greater level of competition for rental properties” [4.15];*
- York has a median affordability ratio of 8.62 and a 5-year rate of change equal to 1.88, compared to 5.90 for Yorkshire and the Humber (0.55 change) and 7.91 (1.14 change) for England [Table 12]. Affordability at a lower quartile [LQ] level is lower (at 7.26) and is below the national rate of 9.11, although it is still much higher than the regional rate of just 5.73;
- *“The affordability statistics and the market signals reveal that as a whole, York is becoming increasingly more unaffordable and that a market signals adjustment in the City is necessitated” [4.19].*
- An uplift of 15% is considered reasonable by GL Hearn. This is higher than the 10% previously recommended in the September 2017 SHMA Update. *“Such an uplift applied to the demographic starting point (484 dpa) would arrive at an OAN of 557 dpa...This is some way short of both the adjusted demographic growth and the economic growth. Therefore the OAN should remain as 790 dpa in order to achieve both improvements to household formation and meet economic growth. This equates to an increase of 63% from the start point.” [4.34-4.35]*

2.54 Regarding **affordable housing need**, this has not been reassessed in the HNU. It notes that the previous SHMA identified a net affordable housing need of 573 dpa:

“The affordable housing evidence suggests that a modest uplift to the demographic-based need figure to improve delivery of affordable housing in the City may be justified.” [4.21]

2.55 However, GL Hearn then reviews a number of High Court judgements and Local Plan Inspectors reports (including the Cornwall Local Plan Inspector’s preliminary findings) and concludes that *“the expectation is that it may be necessary, based on the affordable needs evidence to consider an adjustment to enhance the delivery of affordable housing, but that does not need to be done in a mechanical way’ whereby the affordable need on its own drives the OAN” [4.28].* No further uplift is made.

2.56 The HNU concludes that the 2016-based SNPP provide a more robust assessment of population growth for York than their predecessor, which is “ratified by more recent population estimates” [5.2]. Uplifting the 2016-based SNPP to meet an economic growth of 650 jobs per annum and adjusting household formation rates equates to a need for 790 dpa, which GL Hearn considers to be the OAHN on the grounds that this *“would be sufficient to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs”*. [5.11]

3.0

Critique of the SHMA Update

Introduction

3.1

The Companies represented by Lichfields have serious concerns and wish to raise strong objections to the way in which the Council has chosen to identify an OAHN of 790 dpa (reducing this down from the already unsatisfactory 867 dpa) and the subsequent identification of this need as the housing requirement in the Policy SS1 of the Modified LPP.

3.2

This section provides a critique of GL Hearn’s City of York Housing Needs Update [HNU].

Starting Point and Demographic-led Needs

Population Change

3.3

The Practice Guidance¹³ sets out that in assessing demographic-led housing needs, the latest CLG Household Projections form the overall starting point for the estimate of housing need, but these may require adjustments to reflect future changes and local demographic factors which are not captured within the projections, given projections are trend based. In addition, it states that account should also be taken of ONS’ latest Mid-Year Estimates [MYEs]¹⁴.

3.4

This previous guidance has of course been amended in the revised Practice Guidance, published in March 2019, which now formalises the standard methodology to calculate Local Housing Need. This is founded on the previous 2014-based SNHP rather than the more recent 2016-based equivalents as they “provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes”¹⁵.

3.5

GL Hearn accepts in paragraph 2.18 of its HNU that the 2016-based projections do not have the ability to meet the Government’s housing target of 300,000 homes per annum. In the Government’s Technical Consultation on updates to national planning policy and guidance (October 2018), the Government clarified that the 2016-based projections are not a justification for lower housing need, because:

“1 Basing the assessment of local housing need on 2016-based household projections, would either not support the Government’s objective of significantly boosting the supply of homes (if other variables were unchanged) or produce major distributional changes that would produce instability for local planning authorities in general (if other variables were changed to produce an aggregate consistent with other estimates)...

2 Although the Government generally recommends the use of the latest data in producing assessments of housing need, in this case there have been substantial changes in the method for producing the projections that have resulted in major changes in the distribution of households nationally, and the Government would like to see the new method settling down before making a decision on whether this data provides the best basis for planning” [paragraph 27]

¹³ Practice Guidance - ID 2a-015-20140306

¹⁴ Practice Guidance - ID 2a-017-20140306

¹⁵ Practice Guidance - ID: 2a-005-20190220

- 3.6 These recommendations were subsequently taken forward into the revised NPPF and Practice Guidance following the consultation:

“Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination.

Any method which relies on using the 2016-based household projections will not be considered to be following the standard method as set out in paragraph 60 of the NPPF. As explained above, it is not considered that these projections provide an appropriate basis for use in the standard method”¹⁶.

- 3.7 We acknowledge that the City of York Local Plan was submitted to the Secretary of State for Examination before 26th January 2019 and therefore should be examined under the transitional arrangements (i.e. the 2012 NPPF and 2014 Practice Guidance). For this reason, the LHN calculated by the standard method would not apply.

- 3.8 Furthermore, we accept that in accordance with the 2014 version of the Practice Guidance, GL Hearn is correct to at least model the 2016-based SNPP/SNHP; that does not necessarily mean it is right to use the much lower projections to directly inform the OAHN without making reasonable adjustments, particularly in light of the Government’s clearly stated objective to build more homes consistent with the 300,000 target by the mid-2020s, not to use potentially flawed projections to provide even fewer homes:

“Population changes are only one aspect of the driver for housing supply. Rising incomes, changing social preferences and factors such as real interest rates and credit availability contribute to demand for housing. In summary, the Government’s judgment is that these factors combine to indicate that there is no need to change its aspirations for increasing housing supply. This is consistent with the argument in the housing White Paper that the ambition of delivering more homes should be about both keeping pace with population growth and looking to address worsening affordability through tackling the previous undersupply of homes.”¹⁷

- 3.9 The 2016-based SNHP/SNPP should be sensitivity tested, based on alternative assumptions around underlying demographic projections, based on established sources of robust evidence:

“The household projections produced by the Department for Communities and Local Government are statistically robust and are based on nationally consistent assumptions. However, plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates. Account should also be taken of the most recent demographic evidence including the latest Office for National Statistics population estimates.

Any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence.

¹⁶ Practice Guidance - ID: 2a-015-20190220

¹⁷ MHCLG (October 2018): *Technical consultation on updates to national planning policy and guidance*, paragraph 12

Issues will vary across areas but might include:

- *migration levels that may be affected by changes in employment growth or a one off event such as a large employer moving in or out of an area or a large housing development such as an urban extension in the last 5 years*
- *demographic structure that may be affected by local circumstances or policies e.g. expansion in education or facilities for older people.*¹⁸

3.10 This is explored in more detail below.

The use of longer-term trends

3.11 The PPG is clear that household projections are the starting point for overall housing need and that these are nationally consistent and statistically robust¹⁹. It goes on to state that plan-makers may consider sensitivity testing based on local circumstances, but that this must be based on established sources of robust evidence²⁰. Some of circumstances it cites includes migration levels which are affected by changes in employment, such as a large employer moving to the area or urban extension, or where demographic structures are affected by policies related to specific groups, e.g. expansion in education facilities or facilities for older people.

3.12 The use of short-term trends means recent changes in trends are picked up more quickly, although if recent trends are not representative of the longer term 'norm' they may over or under estimate future need (hence ID 2a-017). Whilst longer term periods can allow unusual trends to be ironed out, they may fail to pick up recent changes and therefore may also over or under-estimate future need. Despite these advantages and disadvantages, it is set out within Government guidance that the official projections – i.e. short-term trends – should provide the starting point for housing needs assessment.

3.13 The question therefore is whether, in York, there are any “*specific local circumstances*” (e.g. movement of major employers, higher education expansion, etc, as cited in ID 2a-017) in recent years which mean that it is not appropriate to use the official 2016-based SNPP and that a longer-term trend is more appropriate. The HNU does not even attempt to speculate about any such events occurring in York, instead concluding that the projections “*provide a more robust assessment of population growth for York than their predecessor*” [paragraph 5.2], and that this has been ratified by more recent population estimates.

3.14 GL Hearn has referred to the Cornwall Local Plan Inquiry (paragraph 4.27) when discussing affordable housing needs. It is therefore relevant to note that the use of long-term trends was accepted at the Cornwall Local Plan by the Inspector in 2015. That Inspector preferred long term trends specifically over the 2008-12 period (i.e. the 2012-based projection base period) and noted that this was to “*even out the likely effect of the recent recession on migration*” (see SHMA para 3.41).

3.15 We can ascertain whether there have been any unusual or one-off circumstances in the City of York specifically which warrant the use of long-term trends over short term trends by looking at historic completions and migration data (an exercise only partially undertaken in the HNU).

¹⁸ Practice Guidance - ID: 2a-017-20140306

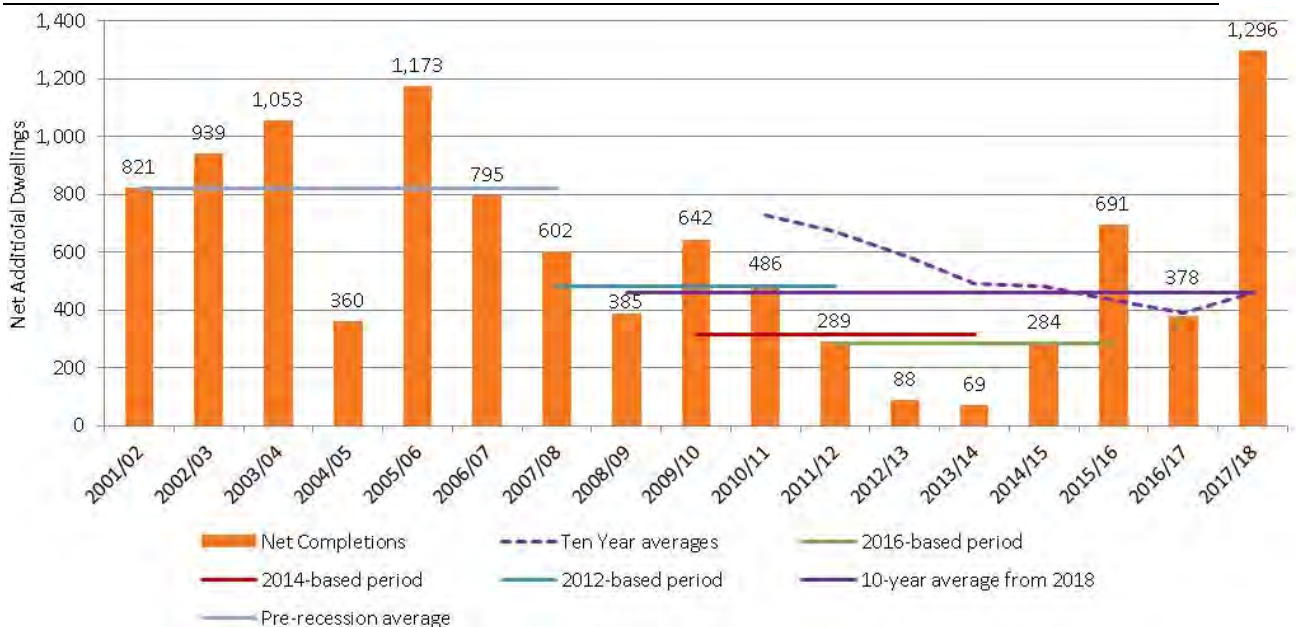
¹⁹ Practice Guidance - ID: 2a-015-20190220

²⁰ Practice Guidance - ID: 2a-017-20190220

Housing completions

- 3.16 Figure 2 show completions in the City of York back to 2001/02, along with the 10-year averages. It shows that in the 7 years up to the recession (2007/08), average completions were 820 per annum. Since then completions have been rapidly falling, with the average declining to just 461 dpa for the 10 years to 2017/18.
- 3.17 In the base period for the 2012-based projections, completions were slightly higher, at 481 dpa. The 2014-based projections are even lower, at 315 dpa. However, the most recent 2016-based projections draw upon a period where average completions were lower than any of the comparator time periods, of just 284 dpa, picking up the steady decline of housebuilding in York that fell to a pitiful 69 dwellings in 2013/14. The 2016-based SNPP does not draw upon data for the past two years, which have averaged 837 dpa, including an impressive 1,296 dwellings in 2017/18. This suggests that housebuilding is recovering to levels that were consistently seen in the boom years prior to the recession.
- 3.18 Based on housebuilding levels, in light of the very large differences seen in each period, it is clear that the 2016-based SNPP is based on a time period when the level of housebuilding might reasonably be said to be at an unusually low level, which could suggest that there is justification to make suitable adjustments.
- 3.19 Overall the trends suggest that since the recession, there has been a gradual, steady decrease in levels of housebuilding in York, although this has started to be corrected from 2015/16 onwards. The figures suggest that over the time period that the 2016-based SNPP relies upon, there have been years in which housebuilding has been unusually low (2012/13 and 2013/14 in particular), which suggests that at the very least an adjustment should be considered to the official projections inappropriate. It is notable that no similar analysis is presented in the HNU.

Figure 2 Historic completions in the City of York - 2001/02 to 2017/18



Source: MHCLG Table 122: Net Additional Dwellings by Local Authority District

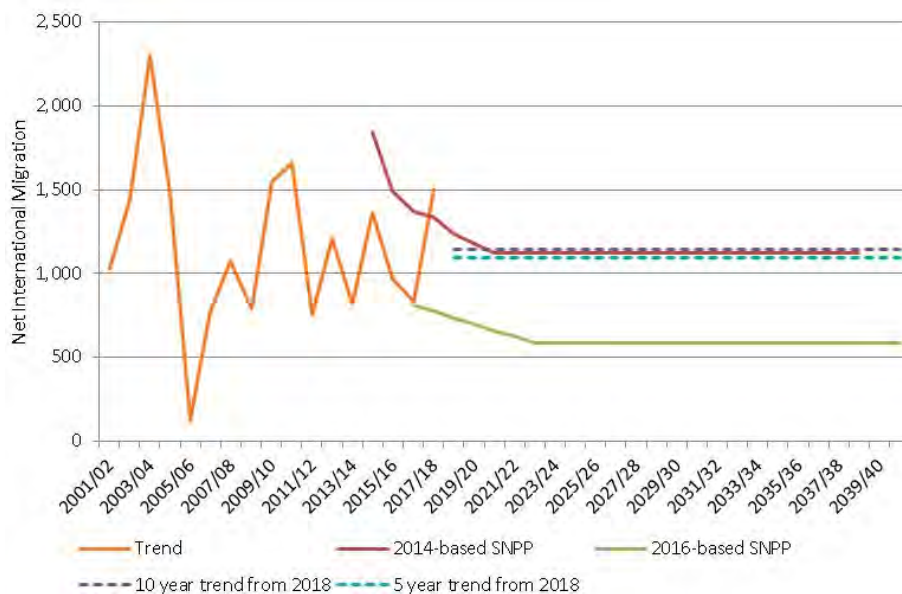
3.20 Whilst the link between housing completions and population growth is complex, it is worth noting that the latest 2018 Mid-Year population estimates suggest that the City of York’s grew by 1,730 residents, in the year in which 1,296 new dwellings were completed.

International Migration

3.21 Another way to consider whether the City of York has seen any ‘unusual’ or one-off events which mean longer term trends are more appropriate is to look at migration. Figure 3 shows historic levels of net international migration to the City of York. It is similar to GL Hearn’s Figure 4 in the HNU, but it includes more up-to-date data relating to the 2018 Mid-Year Population Estimates.

3.22 Overall the international migration figures suggest net migration rose after the recession, at a time when housebuilding was falling. Net migration peaked in 2003/04 and fell to just 127 in 2005/06. However, since that time, net migration has fluctuated between c.750 and 1,660 annually.

Figure 3 Historic Net International migration to the City of York, 2001/02 to 2017/18 and Future Projections



Source: ONS

3.23 In particular, it is clear that the 2016-based SNPP net international migration figures look anomalous compared to past trends. From 2022/23 onwards, this is adjusted down to 587 annually, a figure that is far lower than any net international migration figure for the past 17 years with the exception of 2005/06. In contrast, the 10-year trend equates to 1,143 annually (almost double the 2016-based SNPP), whilst the 5-year trend is almost as high, at 1,096. As can be seen in the Figure, the 2014-based SNPP net international migration figure sits neatly between these trends, at 1,125.

3.24 The HNU argues (in paragraph 2.11) that there is a close alignment between the 2016-based SNPP and the recorded MYE for 2016/17, which there is; however, for 2017/18 the 2016-based SNPP recorded a net international migration figure of just 774, when 1,505 were actually recorded in the 2018 MYE – almost double.

3.25 In terms of what may be causing this discrepancy, it is worth noting that the emerging Local Plan recognises that York has a large proportion of higher education students which

is set to following the expansion of the University of York and as other establishments continue to provide modern education facilities to accommodate growing student numbers [paragraph 1.48]. In particular, York St John University has experienced rapid student growth in recent years:

“The University currently has 6,500 students (FTEs) and employs 750 staff. The increase in student numbers of the last 10 years is circa 93% and it is anticipated that the total will increase to 8,000 by 2018.” [1.60]

- 3.26 It is possible that a significant proportion of these students have come from abroad, helping to boost the projections, and that this is forecast to continue for the foreseeable future.

Summary

- 3.27 ONS's 2016-based SNPP now assumes lower fertility rates, lesser improvements in life expectancy (i.e. higher death rates) and lower net international migration across the country, and York is no exception. The latter input does, however, appear excessive given past trends. Whilst we cannot place too much reliance on one years' worth of data, it is also salient to note that the 2018 MYE (and indeed the housing completions for 2018) suggest a marked upturn in growth.

- 3.28 It is considered that at the very least there should be a sensitivity testing for long term migration trends in the HNU for York based on ‘*specific local circumstances*’ (as per PPG ID 2a-017). In this respect, the HNU does not fulfil the requirements set out in ID 2a-017 regarding sensitivity testing of the official projections.

Market Signals

- 3.29 The Framework sets out the central land-use planning principles that should underpin both plan-making and decision-taking. It outlines twelve core principles of planning that should be taken account of, including the role of market signals in effectively informing planning decisions:

“Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.” [S17]

- 3.30 The Practice Guidance²¹ requires that the housing need figure as derived by the household projections be adjusted to take into account market signals. It indicates that comparisons should be made against the national average, the housing market area and other similar areas, in terms of both absolute levels and rates of change. Worsening trends in any market signal would justify an uplift on the demographic-led needs. In addition, the Practice Guidance²² highlights the need to look at longer term trends and the potentially volatility in some indicators.

- 3.31 The Practice Guidance also sets out that:

“...plan-makers should not attempt to estimate the precise impact of an increase...rather they should increase planning supply by an amount that, on reasonable assumptions...could be expected to improve affordability...”²³.

²¹ Practice Guidance - ID 2a-019-20140306

²² Practice Guidance - ID 2a-020-20140306

²³ *ibid*

- 3.32 This clearly distinguishes between the demographic-led need for housing (generated by population and household growth) and the market signals uplift which is primarily a supply response over and above the level of demographic need to help address negatively performing market signals, such as worsening affordability.
- 3.33 As set out in detail above, GL Hearn has undertaken an analysis of market signals in its Housing Needs Update (Section 4.0). In that report, the HNU notes that
- Lower quartile house prices in York exceed that of England by £30,000 despite having a similar overall median house price;
 - The gap of median house price growth between York and North Yorkshire has widened from 10 years ago. Since 2008 the rate of change for York has been 1.25, similar to the national growth of 1.3;
 - Median rental values in York are £745, £70 higher than the rest of England and £220 higher than Yorkshire and the Humber region [4.13]. LQ rental price growth has increased by 14% over the past 5 years, compared to 11% nationally;
 - York has a median affordability ratio of 8.62 and a 5-year rate of change equal to 1.88, compared to 5.90 for Yorkshire and the Humber (0.55 change) and 7.91 (1.14 change) for England [Table 12];
- 3.34 As a consequence of these poor (and worsening) housing market signals, GL Hearn concludes that:
- “The affordability statistics and the market signals reveal that as a whole, York is becoming increasingly more unaffordable and that a market signals adjustment in the City is necessitated”* [4.19].
- 3.35 On the basis of these signals, GL Hearn applied an uplift of 15%. This is higher than the 10% previously recommended in the September 2017 SHMA Update. *“Such an uplift applied to the demographic starting point (484 dpa) would arrive at an OAN of 557 dpa...This is some way short of both the adjusted demographic growth and the economic growth. Therefore, the OAN should remain as 790 dpa in order to achieve both improvements to household formation and meet economic growth. This equates to an increase of 63% from the start point.”* [4.34-4.35]
- 3.36 In our previous representations²⁴, Lichfields concluded that based on a detailed review of similar market signals, an uplift of 20% was suitable. Nothing that GL Hearn has presented causes us to change our opinion; quite the reverse in fact, given that on many of the indicators, the housing market appears to be even more constrained and under pressure than was the case even one year ago.
- 3.37 To take a clear example, which is not examined in GL Hearn’s assessment of market signals, the Practice Guidance is clear that historic rates of development should be benchmarked against the planned level of supply over a meaningful period. Table 2 sets the Council’s various housing targets/presumed OAHN against the actual net housing completions. With the exception of the last year, housing delivery in York has missed the target each year since 2006/07. Overall delivery targets for these years was missed by c.30% which equals 3,127 units below the target level. Over the plan period from 2012/13, GL Hearn noted in its previous May 2017 SHMA Addendum [§3.14] that under-delivery may have led to household formation (particularly of younger households) being constrained and states that this point is picked up in the report which uses a demographic projection-based analysis to establish the level of housing need moving forward.

²⁴Lichfields (March 2018): *Housing Issues Technical Report*

Table 2 Rate of net housing delivery in York against possible policy benchmarks, 2004/05-2017/18

Year	Net Housing Completions	Council's OAHN (790 dpa)	
		'Need'*	+/-
2004/05	360	640	-280
2005/06	1,173	640	+533
2006/07	795	640	+155
2007/08	602	640	-38
2008/09	385	850	-465
2009/10	642	850	-208
2010/11	486	850	-364
2011/12	289	850	-561
2012/13	88	790	-702
2013/14	69	790	-721
2014/15	284	790	-506
2015/16	691	790	-99
2016/17	378	790	-412
2017/18	1,331	790	+541
Total	7,573	10,700	-3,127

Source: MHCLG LT122

*RSS assumed average 640 dpa 2005/05-2007/08; 850 dpa 2008/09 -2011/12

*MHCLG: Housing Delivery Test Results 2018

- 3.38 The SHMA Update [§3.15] considers that this past under-delivery is not a discrete part of the analysis but is one of the various market signals which indicate a need to increase provision from that determined in a baseline demographic projection. It notes that that this market signal will require upward adjustment through consideration of migration and household formation rates rather than just a blanket increase based on the level of 'shortfall'.
- 3.39 It is clear from the Council's own evidence that the City has consistently under-delivered housing, with a failure to deliver anything more than 642 dwellings in any single year between 2007 and 2015. The policy benchmarks suggest that the level of past under-delivery is 3,127 dwellings over the past 12 years.
- 3.40 **Furthermore, the Council's already low housing delivery figures have been artificially boosted by the inclusion of student accommodation in the completions figures (see discussion below).**

What scale of uplift should be applied?

- 3.41 The PPG sets out a clear two-stepped process to addressing market signals within the calculation of OAHN:
- 1 Firstly, it is necessary to determine **whether** a market signals uplift is necessary. This is set out in PPG ID2a-019 within the first sub-paragraph as follows:

“Appropriate comparisons of indicators should be made... A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.”
 - 2 Secondly, when a market signals uplift is required, it is necessary to identify at **what scale** that should be set, with guidance given that it should be set at a level that could be expected to improve affordability. This is set out in PPG ID2a-019 within the second and third sub-paragraphs as follows:

“In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable... they should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability, and monitor the response of the market over the plan period.”

3.42 The principle of a market signals uplift in York (i.e. Stage 1) is not disputed by the Council’s housing consultants. However, the scale of the uplift is disputed, principally because there is no sound basis to conclude that the uplift can be reasonably expected to improve affordability, and the HNU provides no evidence that it will do so. In addition, as previously noted, because the HNU has applied its market signals uplift to a flawed demographic-led assessment of need, any figure flowing from this is in itself also flawed.

3.43 We examine the scale of a suitable uplift in Section 4.0.

Affordable Housing Needs

3.44 In line with the 2012 Framework²⁵, LPAs should:

“...use their evidence based to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing...”

“...prepare a SHMA which...addresses the need for all types of housing, including affordable.”

3.45 The Practice Guidance²⁶ sets out a staged approach to identifying affordable housing needs, and states that affordable housing need should be:

“...considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments...an increase in the total housing figures included in the plan should be considered where it could help deliver the required number of affordable homes.”

3.46 As set out in Section 2.0, two High Court Judgements go to the heart of addressing affordable housing within the identification of OAHN. ‘Satnam’ establishes that affordable housing needs are a component part of OAHN, indicating that the ‘proper exercise’ is to identify the full affordable housing needs and then ensure that this is considered in the context of its likely delivery as a proportion of mixed market/affordable housing development. ‘Kings Lynn’ builds on ‘Satnam’, identifying that affordable housing needs *“should have an important influence increasing the derived OAHN since they are significant factors in providing for housing needs within an area.”* [S36]. This is clear that affordable housing needs are a substantive and highly material driver of any conclusion on full OAHN.

3.47 Neither the HNU nor its predecessor, the September 2017 SHMA Assessment Update, states that it does not review affordable housing need, although the latter states that the situation is unlikely to have changed significantly from the 2016 SHMA. The 2016 SHMA identified a net affordable housing need of 573 homes per annum or 12,033 dwellings over the 2012-2033 period. This suggests a worsening situation when compared with the previous figure of 486 affordable homes per annum needed in the previous 2011 SHMA, produced by GVA.

3.48 Lichfields has not analysed in detail the figures forming the assessment of affordable

²⁵ Framework - Paragraphs 47 and 159

²⁶ Practice Guidance - ID: 2a-022-20140306 to 2a-029-20140306

- housing needs, due in part to limitations on access to the underlying data; instead, Lichfields has focused on how this need has informed the OAHN conclusion.
- 3.49 The SHMA Assessment Update [§3.3] suggests that large parts of this need are either existing households (who do not generate need for additional dwellings overall) or newly forming households (who are already included within the demographic modelling).
- 3.50 It further states [§§3.17-3.18] that:
- “The City of York Council currently have an affordable housing policy of up to 30%. The SHMA identified a net affordable housing need of 573 dwellings. Based on this level of need and the current policy the City would require to deliver 1,910 dwellings per annum. To put this in context the City has only delivered more than 1000 homes once since 2004-5. Using a lower policy target would result in an even higher need.”*
- “While there is clearly an affordable housing issue in the City many of the households in need are already in housing (just housing that is not suitable for some reason such as overcrowding) and therefore do not generate a need for additional dwellings”.*
- 3.51 The provision of the net affordable housing need identified is likely to be unrealistic given past dwelling completions in City of York. With regard to this matter the SHMA Assessment Update states [§3.28]:
- “Given the balance of judgement it would appear that a 10% adjustment could be justified in York on the basis of the previously established affordable housing need the updated market signals evidence.”*
- 3.52 In taking this approach, GL Hearn is effectively conflating the uplift resulting from affordable housing need with uplift resulting from market signals analysis. These are two separate steps in the Practice Guidance and should not be combined in this manner.
- 3.53 In contrast, the HNU reiterates the 573 dpa need, and accepts that *“a modest uplift to the demographic based need figure to improve delivery of affordable housing in the City may be justified.”* [paragraph 4.20].
- 3.54 However, the HNU then reviews a number of High Court judgements and other Inspector’s reports, notably that for the Cornwall Local Plan, and concludes that *“the expectation is that it may be necessary, based on the affordable needs evidence to consider an adjustment to enhance the delivery of affordable housing, but that this does not need to be done in a ‘mechanical way’ hereby the affordable need on its own drives the OAN”.* [paragraph 4.28]
- 3.55 The HNU does not proceed to test the scale of uplift that might be appropriate to help meet this very high level of affordable housing need, merely stating in the conclusions that the employment-led 790 dpa *“would be sufficient to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs”.*
- 3.56 Policy H10 of the emerging Local Plan sets out a wide range of affordable housing requirements on residential schemes for 2 or more dwellings, with 30% at the upper end for greenfield sites containing 15 or more dwellings. Applying this optimistic upper target to the 790 dpa CoYC OAHN would potentially deliver (at best) 237 affordable units annually. This represents just 41% of the 573 dpa target.
- 3.57 At a delivery rate of 30% of overall housing, the City of York would need to deliver **1,910**

dpa to address affordable housing needs in full.

3.58 Taking into account affordable need within the calculation of OAHN does not necessarily involve a mechanistic uplift, or an indication that such identified needs must be met in full. It has to be a scenario which, on a reasonable basis, could be expected to occur. This is set out in the Kings Lynn judgment which concluded:

“...This is no doubt because in practice very often the calculation of unmet affordable housing need will produce a figure which the planning authority has little or no prospect of delivering in practice. That is because the vast majority of delivery will occur as a proportion of open-market schemes and is therefore dependent for its delivery upon market housing being developed.” [§35]

This is also consistent with the Practice Guidance²⁷ which sets out the assessment of need *“does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur.”*

3.59 However, in line with the High Court Judgments, this still needs to be an uplift of consequence, insofar as it can reasonably be expected to occur. This will inevitably need to involve judgement, based on relevant evidence, as to the extent to which any scale of uplift could be reasonably expected to occur.

3.60 For example, it is interesting to note that in the Cornwall Local Plan example that GL Hearn quotes from, the Inspector ultimately **concluded that an uplift to the OAHN was justified, and this should be equal to an additional 1,500 dwellings over the course of the Plan period**²⁸.

3.61 The HNU ultimately does not use the identified acute affordable housing needs in a way in which it has *“an important influence in increasing the derived F[ull] OAN”* as per the Kings Lynn judgment.

3.62 The Local Plan Expert Group [LPEG], in its Report to the Secretary of State for Communities and Local Government in March 2016, recommended various changes to the Practice Guidance with the remit of considering how local plan-making could be made more efficient and effective. Although very limited, if any, weight can be given to the LPEG approach given that it is not policy or endorsed by Government, it is at least helpful in seeking to understand what an appropriate response might be to define the influence of market signals and affordable housing needs. LPEG recommended changes to the preparation of SHMAs and determination of OAHN.

3.63 With regard to affordable housing need in the preparation of SHMAs and determination of OAHN it proposed that where the total number of homes that would be necessary to meet affordable housing need is greater than the adjusted demographic-led OAHN, then this figure should be uplifted by a further 10%. The 10% uplift was intended to provide a streamline approach that removes judgement and debate from the process of setting OAHN (as opposed to what might be the most accurate under current Practice Guidance).

3.64 Given the significant affordable housing need identified in City of York, Lichfields considers that this **10% uplift would be appropriate** in this instance and should be applied to the OAHN.

²⁷ Practice Guidance - ID:2a-003-20140306

²⁸ Planning Inspectorate (23rd September 2016): Inspector’s Report on the Examination into the Cornwall Local Plan Strategic Policies, paragraph 52

4.0 **OAHN – Demographic and Affordable Needs**

Introduction

4.1 In practice, applying the 2012 NPPF requires a number of key steps to be followed in order to arrive at a robustly evidenced housing target:

- The starting point for Local Plans is to meet the full objectively assessed development needs of an area, as far as consistent with the policies set out in the Framework as a whole [§6, §47 & §156].
- An objective assessment of housing need must be a level of housing delivery which meets the needs associated with population and household growth, addresses the need for all types of housing including affordable and caters for housing demand [§159].
- Every effort should be made to meet objectively assessed needs for housing and other development, and there should be positive response to wider opportunities for growth. Market signals, including affordability should be taken into account when setting a clear strategy for allocating suitable and sufficient land for development [§17].
- In choosing a housing requirement which would not meet objectively assessed development needs, it must be evidenced that the adverse impacts of meeting needs would significantly and demonstrably outweigh the benefits, when assessed against the policies within the Framework as a whole; unless specific policies indicate development should be restricted [§14].
- Where an authority is unable to meet its objectively assessed development needs or it is not the most appropriate strategy to do so, e.g. due lack of physical capacity or harm arising through other policies, it must be demonstrated under the statutory duty-to-cooperate that the unmet need is to be met in another local authority area in order to fully meet development requirements across housing market areas [§179 & §182 bullet point 1].

4.2 It is against these requirements of the Framework which the City of York's housing need must be identified.

Demographic Modelling

4.3 The Government's 2014 Practice Guidance states that "*household projections published by CLG should provide the starting point estimate of overall housing need.*" It also states that the household projection may require adjustment to reflect factors affecting local demography and household formation rates which are not necessarily captured in past trends²⁹.

4.4 To comply with the Practice Guidance, Lichfields has modelled a range of new scenarios using the PopGroup demographic modelling tool. This analysis has used headship rates from the 2014-based SNHP, 2016 SNHP and also (in a similar vein to GL Hearn in its HNU) an accelerated household formation rate to reflect a partial return to past trends. We have firstly derived the baseline demographic need, which acts as the 'starting point' when determining the housing OAN. Thereafter, various assumptions, adjustments and

²⁹ ID 2a-015-20140306

sensitivities have been applied to take account of new demographic data, local factors and economic aspirations.

- 4.5 Using the data inputs and assumptions above, the following demographic scenarios have been assessed. The scenarios are modelled over the period 2017-2033 to align with the Local Plan period (hence there is a moderate discrepancy with GL Hearn's HNU, which models over the period 2012-2037). The scenarios modelled are as follows:
- a **Scenario A: 2014-based SNPP** – using on the 2014-based SNPP, incorporating headship rates from the 2014-based SNHP, plus an allowance for vacant/second homes (1.7%);
 - Scenario Ai: 2014-based SNPP / 2018 MYE / PCU** - Applying the same assumptions as for Scenario Ai; however, it adjusts the 2015, 2016, 2017 and 2018 population figures to reflect the latest ONS Mid-Year Population Estimates. This has the effect of increasing the 2018 population figure from 212,068 to 209,893;
 - Scenario Aii: Standard Methodology** figure of 1,069 dpa is modelled.
 - b **Scenario B: 2016-based SNPP** – using the 2016-based SNPP, incorporating headship rates from the 2016-based SNHP, plus an allowance for vacant/second homes (1.7%);
 - Scenario Bi: 2016-based SNPP PCU** - Applying the same assumptions as for Scenario B; however, starting post-2017, headship rates amongst 15-34 year olds are projected to make up 50% of the difference of long term trends (as per Scenario Ai) by 2033;
 - Scenario Bii: 2016-based SNPP / 2018 MYE / PCU** - Applying the same assumptions as for Scenario Ai; it adjusts the 2015, 2016, 2017 and 2018 population figures to reflect the latest ONS Mid-Year Population Estimates. This has the effect of increasing the 2018 population figure from 209,432 to 209,893;
 - c **Scenario C: Long Term Migration Trends MYE** – based on past migration trends as observed over the last 10 years (to 2017) in the City of York, re-based to 2018 MYE population;
 - Scenario Ci: Long Term Migration Trends MYE PCU** – as above, but applying accelerated headship rates to the 15-34 age cohorts as per Scenario Ai.

Economic Scenarios

- d **Scenario D: ELR Scenario 2 Jobs Growth** – based on forecasts of annual job growth (397 jobs 2017-2018, 650 jobs p.a. between 2018 and 2033,) for the City of York to align with the ELR, applied to the 2016-based SNPP (including 2018 MYE);
 - Scenario Di: ELR Scenario 2 Jobs Growth PCU** – as above, but applying accelerated headship rates to the 15-34 age cohorts as per Scenario Ai;
 - e **Scenario E: Past Trend Job Growth** – Taking into account the Compound Average Growth Rate [CAGR] of 0.83% that was achieved between 2000-2017 in the City of York (as recorded by NOMIS Job density figures), this scenario assumes this will continue over the plan period (including 2018 MYE);
 - Scenario Ei: Past Trend Job Growth PCU** – as above, but applying accelerated headship rates to the 15-34 age cohorts as per Scenario Ai.
- 4.6 The findings of the demographic scenarios are set out in Table 3.

Table 3 Key Outputs – Demographic Scenarios for the City of York, 2017-2033

Scenario	Change in Population	Change in Households	Dwellings 2017-2033	
			Total Change	DPA
Scenario A: 2014-based SNPP	21,900	13,008	13,231	827
Scenario Ai: 2014-based SNPP / 2018 MYE / PCU	24,027	14,318	14,564	910
Scenario Aii: Standard Methodology	33,979	16,815	17,104	1,069
Scenario B: 2016-based SNPP	13,492	7,192	7,315	458
Scenario Bi: 2016-based SNPP PCU	13,492	10,685	10,868	679
Scenario Bii: 2016-based SNPP / 2018 MYE / PCU	16,038	11,107	11,297	706
Scenario C: Long Term Migration Trends MYE	23,926	10,851	11,037	690
Scenario Ci: Long Term Migration Trends MYE PCU	23,926	14,481	14,730	921

Source: Lichfields using PopGroup

- 4.7 The findings of the demographic scenarios are broadly in line with those reported in the HNU, with differences generally attributable to the different timeframes used (2017-2033 vs. 2012-2037) and our incorporation of the latest 2018 MYE in some of the Scenarios. The projections clearly demonstrate the extent to which the 2014-based SNPP are significantly higher than the more up to date 2016-based SNPP. Allowing for these differences, the equivalent scenarios in the HNU’s Table 6 include Lichfield’s Scenario B, whereby our figure of 458 dpa equates to GL Hearn’s figure of 484 dpa; and our Scenario Bi, whereby our figure of 679 dpa is identical to GL Hearn’s 679 dpa.
- 4.8 Lichfields’ view is that the demographic starting point should comprise Scenario Bii, which updates the 2016-based SNPP with the most up-to-date demographic data (the 2018 MYE) and also makes a suitable provision for accelerating household formation rates in line with long term trends. **This equates to 706 dpa.**
- 4.9 However, as set out in detail in Section 3.0, Lichfields has serious concerns regarding the accuracy of the long-term international migration rates that underpin the 2016-based SNPP and therefore consider that a case can be made to examine the long-term international migration trends. By so doing, Scenario Ci (incorporating the 2018 MYE and PCU) generates a figure of **921 dpa**. Lichfields considers that this should form the demographic-led OAHN before other uplifts are applied.
- 4.10 Table 4 presents the employment-led scenarios. Scenario Di (**842 dpa**) represents the closest match to GL Hearn’s 790 dpa OAHN figure, which aligns with the Local Plan’s job target of 650 annually. The 52 dpa difference is likely to be due to subtle differences in our underlying assumptions concerning vacancy rates, timeframes, assumptions concerning economic activity rates, commuting ratios, unemployment levels and the incorporation of a higher MYE population starting point in 2018.
- 4.11 Lichfields’ view is that Scenario Ei is also valid, as the PPG states that when assessing housing need, “Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate”³⁰.
- 4.12 Given the very high levels of past job growth in the City, this would generate a need for 829 dpa, rising to **1,062 dpa** when accelerated household formation rates are applied.

³⁰ PPG 2a-019-20140306

Table 4 Key Outputs – Employment-led Scenarios for the City of York, 2017-2033

Scenario	Change in Population	Change in Jobs	Change in Households	Dwellings 2017-2033	
				Total Change	DPA
Scenario D: ELR Scenario 2 Jobs Growth	21,727	10,147	9,801	9,969	623
Scenario Di: ELR Scenario 2 Jobs Growth PCU	21,727	10,147	13,242	13,470	842
Scenario E: Past Trend Job Growth	30,831	16,032	13,041	13,266	829
Scenario Ei: Past Trend Job Growth PCU	30,831	16,032	16,711	16,998	1,062

Source: Lichfields using PopGroup

4.13 To summarise, our view is that the demographic-led OAHN (before further uplifts are applied) for the City of York would equate to the long-term migration Scenario Ci, at **921 dpa**, notwithstanding the considerable uncertainty surrounding Brexit. The 2016-based SNPP appears increasingly out of step with the latest 2018 MYE (which were unavailable to us in our previous representations), and it is considered that in this particular instance it is a reasonable sensitivity to apply.

4.14 As for the employment led scenarios, the level of job growth projected by the ELR Scenario 2 scenarios can be accommodated within the 921 dpa demographic need, although we consider that a case could be made to increase the figure still further, to **1,062 dpa**, to match job growth based on past trends. Furthermore, this latter figure is very similar to the NPPF 2019 standard method LHN figure of 1,069 dpa.

Do Market Signals indicate a need for an upward adjustment to purely demographic-led needs?

4.15 The market indicators assessed in Section 5.0 shows that there are significant imbalances between the demand for and supply of housing in the City of York. This analysis indicates pressure on the housing market, which will not be addressed by providing only for the level of growth produced by the continuation of demographic trends. A response is clearly required through an adjustment to the demographic-based scenarios, in line with the recommendations set out in the Practice Guidance.

Determining a scale of uplift

4.16 By way of setting the initial context, the 2019 HNU recommends a 15% uplift to the demographic starting point of 484 dpa, which results in an OAHN of 557 dpa. However, GL Hearn notes that this is some way short of the economic led need of 790 dpa, which is the housing requirement now identified in the Proposed Modifications to the City of York Local Plan.

4.17 It is noted that although the Local Plan will be examined under the transitional arrangements for the NPPF, the standard method identifies that York would have an **affordability uplift equal to 30% to the 2014-based SNHP**. This is because the Ratio of median house price to median gross annual workplace-based earnings in York was 8.86 in 2018. This is significantly higher than the equivalent affordability ratio for England and Wales, at 7.83 for 2018.

1. Review of National position

4.18 Under the current planning system, addressing affordability across the country will be a key function of implementing a large number of Local Plans either adopted or currently

being prepared. Each area will have a role in contributing to Government's aims as expressed in national planning policy. At the national level, a number of studies have analysed the scale of housing delivery and dwelling stock growth that would be necessary to address affordability problems:

- 1 The Barker Review of Housing Supply (2004)³¹ concluded that to reduce the long-term house price trend to 1.1% per annum (the average across the EU) would require national delivery totalling 245,000 private dwellings per annum to 2026, alongside an increased provision of social sector housing (23,000 p.a.). The Barker Review concluded that such a level would be necessary for *"improving the housing market"* and ensure that *"affordability is increasingly improved over time"* (paras 1.39 and 1.40). Nationally, that scale of growth would represent dwelling stock growth of **c.1.13%** per annum³².
- 2 The National Housing and Planning Advice Unit's (NHPAU) *'Developing a target range for the supply of new homes across England'* (October 2007)³³ concluded that (para 4.68) the *"NHPAU believes that there is a realistic possibility of stabilising the affordability of market housing over the long-term if a supply target for 270,000 net additions to stock, in the right place and of the right type can be adopted through the planning system for delivery before or by 2016."* This would represent a **1.14%** per annum scale of stock growth.
- 3 In July 2016, the House of Lords Select Committee on Economic Affairs published their report *'Building More Homes'*³⁴ which was the output of the House of Lords' inquiry into the housing market. It drew upon evidence provided to the inquiry by HM Treasury (HMT) indicating that *"modelling suggests that in order to keep the house prices to earnings ratio constant, somewhere between 250,000 and 300,000 homes per year need to be built"* in arriving at its ultimate conclusion that, *"to address the housing crisis at least 300,000 new homes are needed annually for the foreseeable future."* (our emphasis). This would represent a **1.26%** per annum scale of stock growth.
- 4 The Redfern Review,³⁵ a 2016 independent review of the causes of falling home ownership and associated housing market challenges, was informed by a housing market model built by Oxford Economics³⁶ which looked at the impacts of different supply assumptions on prices and home ownership. It identified that *"To put downward pressure on prices new supply would need to outstrip underlying household formation"* modelling a boost in housing supply of 100,000 above their baseline forecast of 210,000 dwellings per annum, concluding that 310,000 dpa *"helps to keep prices in check"* up to 2026. This would represent a **1.31%** per annum growth in dwelling stock.

4.19 What each of the above studies have demonstrated is that increasing dwelling stock growth would be necessary to address and improve affordability at the national level. Across the analysis it suggests that, at the national level, stock growth of between 1.1%

³¹ 'Review of Housing Supply, Delivering Stability: Securing our Future Housing Needs' (March 2004), Kate Barker - http://news.bbc.co.uk/1/hi/shared/bsp/hi/pdfs/17_03_04_barker_review.pdf

³² 23,733,000 dwelling stock in England in 2016 (CLG Live Table 100)

³³ 'Developing a target range for the supply of new homes across England' (October 2007), NHPAU - <http://webarchive.nationalarchives.gov.uk/20120919132719/http://www.communities.gov.uk/documents/housing/pdf/523984.pdf>

³⁴ 'Building more homes' 1st Report of Session 2016–17 (15 July 2016) House of Lords Select Committee on Economic Affairs (HL Paper 20) - <http://www.publications.parliament.uk/pa/ld201617/ldselect/ldeconaf/20/20.pdf>

³⁵ 'The Redfern Review into the decline of home ownership' (16 November 2016) - http://www.redfernreview.org/wp-content/uploads/2016/01/TW082_RR_online_PDF.pdf

³⁶ 'Forecasting UK house prices and home ownership' (November 2016) Oxford Economics - <http://www.redfernreview.org/wp-content/uploads/2016/11/20161114-Redfern-Review-modelling-paper.pdf>

and 1.3% per annum could achieve the beneficial impacts on affordability needed (recognising that in local areas this will clearly vary, depending on the local household growth rates). The figures would all represent significant increases above background projected household growth (c.210,000 households p.a. in the CLG 2014-based projections over the period to 2039 is the equivalent to c.215,000 dwellings p.a.) of between 21% and 44%. This gives an indication of the scale of dwelling delivery potentially required to address market signals at the national level.

- 4.20 The above reports show a clear consensus that around 250,000-300,000 homes per year are needed nationally. The Government’s standardised methodology equates to a national total of 266,0000 homes per year (the figure is 300,000 without the 40% ‘cap’), although the methodology includes a caveat allowing authorities to plan for more than the methodology shows, for example if there are economic reasons³⁷.
- 4.21 In the Autumn 2017 Budget, the Chancellor Phillip Hammond MP set out Government aspirations for housebuilding to reach 300,000 per year³⁸. It is clear that at a national level the consensus is that at least 250,000-300,000 homes per year are needed, and this would represent annual growth in the range of 1.1% to 1.3%.
- 4.22 Given that some areas (i.e. with weaker affordability pressures/footnote 6 environmental constraints) would be expected to do less than their ‘share’ of the nationally needed 1.1% to 1.3%, equally areas which are less affordable would be expected to do more than their ‘share’, i.e. more than 1.3%.
- 4.23 York is an area where affordability is worse than nationally (for example, the median quartile resident-based affordability ratio is 8.9, compared to 7.8 for England & Wales, whilst the figure is even more stark for Lower Quartile affordability, with York’s figure, at 9.4, dwarfing the national rate of 7.2). The City of York needs to do more than the national average to address affordability. Table 5 shows the equivalent dwellings per annum under various annual growth rates for York.

Table 5 Growth rate and equivalent dwellings per annum from 2017 to 2033

Growth rate	Dwellings per annum	Growth rate	Dwellings per annum
1.0%	952	1.6%	1,595
1.1%	1,055	1.7%	1,708
1.2%	1,160	1.8%	1,823
1.3%	1,267	1.9%	1,939
1.4%	1,375	2.0%	2,057
1.5%	1,484	2.1%	2,177

Source: Lichfields based on MHCLG Table 125 Dwelling Stock data – 88,280 dwellings in York as at 2017

- 4.24 For additional context, and to consider what scale of growth might “*reasonably be expected to occur*”, the Table below reviews stock growth rates in adopted post-NPPF plans. Even the area with the highest growth rate (Cherwell, at 1.82%) will see this increase further soon, when it reviews its Local Plan to include unmet need from Oxford.

³⁷ See ‘Planning for the Right Homes in the Right Places’ consultation

³⁸ See Autumn Budget at

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/661583/autumn_budget_2017_print.pdf

Table 6 Adopted Housing Targets in post-NPPF Plans

	Adopted Annual Housing Target	Stock 2016	Annual Growth Rate
Cherwell*	1,140(+)	62,402	1.82%
Taunton Deane	850	52,840	1.61%
Milton Keynes	1,750	108,981	1.61%
Swindon	1,625**	94,374	1.72%
East Cambridgeshire	575	36,971	1.56%

Source: Housing targets - respective Local Plans. Stock - DCLG Council Tax Base data. *Figure for Cherwell will increase following Local Plan Review to take account of additional need from Oxford. **Total housing target 2011-2026 22,000 dwellings (1,467 dpa), however Policy SD2 of Local Plan states average annual housing delivery from 2016-2026 will be higher at 1,625 dpa.

2. Affordability Modelling based on University of Reading/OBR assumptions

4.25 The Office for Budget Responsibility [OBR] produced Working Paper No.6 Forecasting House Prices in July 2014. The report identifies the following with regards to future average earnings growth and median house price growth (the components of an affordability ratio) in paragraph 3.12:

“Using some long-run assumptions for real income growth (2.2 per cent a year, including growth in the number of households of 1 per cent a year) and housing supply (keeping pace with the number of households), and assuming the housing discount rate and wage share variable are stationary, the model predicts around 3.3 per cent real house price growth a year in steady state. In addition, assuming consumer price inflation in line with the Bank of England’s 2% target implies 5.3 per cent a year nominal house price growth in steady state.”

4.26 The University of Reading's affordability model found a high price elasticity (-2.0) in relation to increases in stock at regional level in England, implying in-effect that for every 1% increase in supply (with housing supply keeping pace with the household projections), relative prices would be expected to fall by 2%. These assumptions have been combined with the wage/house price growth forecasts in the March 2017 OBR Outlook to model affordability outcomes.

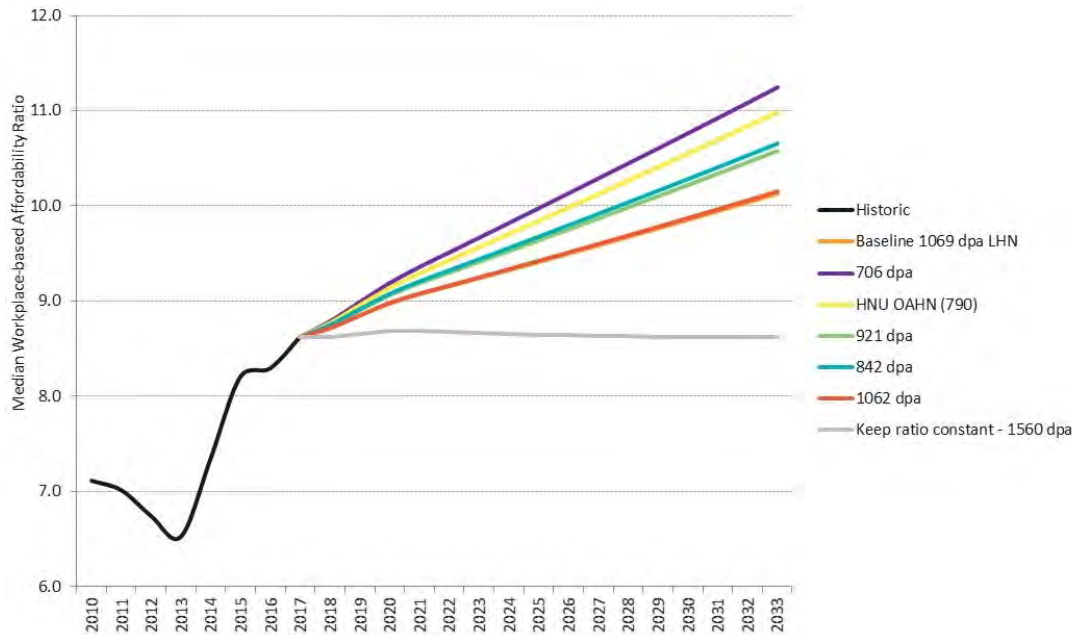
4.27 There are a number of examples elsewhere of where this affordability modelling has informed the scale of market signals uplift applied. In Mid Sussex, the Inspector’s interim conclusions on the housing requirement (published February 2017) concluded that:

- The Council’s 24 dpa uplift for market signals was not sufficient, and although it was similar to approaches elsewhere however there have been changes in circumstances and a new approach is needed (p.2/3);
- House prices and affordability have worsened markedly in recent years, and there is a ‘serious and growing affordability problem’ for those on lower incomes (p.3);
- The approach of comparing a District to its neighbours in terms of market signals is flawed, because if each authority replicated this approach the cycle of worsening affordability would be perpetuated (p.3)
- A significant uplift is needed to improve affordability, and the approach based on OBR/University of Reading has the ‘greatest value’ (p.5);
- An uplift of 20% is well-founded and realistic (p.6).

- 4.28 On 1st February 2018, the Inspector’s Report on the Waverley Local Plan (part 1) Examination was published. In respect of market signals, the Inspector noted that:
- Affordability is particularly poor in Waverley, it is amongst the least affordable area outside London and affordability is worsening (IR 20);
 - The plans requirement, which incorporate a 5% upward adjustment to household formation rates to account for market signals is ‘not capable of addressing the Borough’s serious and worsening problem of housing affordability (IR 21);
 - The OBR/University of Reading approach put forward by representors (which yielded a 28.8% uplift) represents a ‘credible approach’ to modelling supply and affordability. Overall an uplift on the starting point of 25% should be applied (IR 22).

4.29 Applying this approach to York (for illustrative purposes, median workplace-based earnings are shown) suggests that 1,560 dpa would be needed to keep affordability at its 2018 level, as shown in Figure 4. This is set in the context that affordability has evidently worsened very significantly in the last 4 years alone. At the current HNU OAHN of 790 dpa, affordability would continue to worsen to around 11.0 by the end of the plan period.

Figure 4 Historic and forecast change in Median workplace-based affordability ratio



Source: ONS, Lichfields based on OBR/University of Reading/ONS

4.30 Table 7 shows the impacts on median workplace-based affordability in the short and long term. It demonstrates a significant worsening at the HNU’s current OAHN, and a clear improvement which directly relates to the scale of housing growth. A level of around 1,560 dpa would be sufficient to maintain affordability in the longer term.

Table 7 Impact of scales of housing growth on affordability

Dwellings per annum	Median, workplace-based		
	2017 ratio	Ratio in 2025	Ratio in 2033
(HNU OAHN) 790 dpa	8.62	9.8	11.0
Scenario Bii: 2016-based SNPP PCU/MYE (706 dpa)		10.0	11.2
Scenario Ci: Long Term Migration PCU (921 dpa)		9.6	10.6
Scenario Di: ELR Scenario 2 (842 dpa)		9.7	10.7
Scenario Ei: Past Trends Job growth (1,062 dpa)		9.4	10.1
Level required to keep current (2017) affordability ratio constant (1,560 dpa)		8.6	8.6

Source: Lichfields based on OBR/University of Reading/ONS

- 4.31 This exercise provides two useful conclusions in assessing what scale of uplift might be needed in York:
- 1 The HNU’s OAHN would clearly be insufficient to bring about any improvement whatsoever in affordability, and affordability would likely worsen significantly in the short and long term; and
 - 2 Up to 1,560 dpa would be needed just to maintain affordability at its 2017 (which is the highest level seen in York), and arguably this should be treated as a minimum given affordability has worsened significantly in the last few years alone.

3. Apportionment of national needs

- 4.32 The City of York is relatively worse in respect of affordability than the national equivalent. All other things being equal, to improve affordability across the country, the City of York and its HMA peers would need to make a proportionately greater uplift than those where affordability issues are less acute. This exercise has been undertaken on the basis that Government now has a clear aim to bring housebuilding to a level of 300,000 per year by the mid-2020s, as set out in the Autumn 2017 budget³⁸ (a level which is consistent with much of the literature review considered earlier in this section). This national total equates to an uplift of 85,000 on the 2016-based household projections (which suggest a need for c. 215,000 homes per annum).

- 4.33 It is possible to consider how this required uplift should be shared between 320+ Local Planning Authorities across the country in order to seek to hold the affordability ratio (at least at a national level) constant. Three alternative scenarios for market signals uplifts across the country have been modelled, as follows:

- 1 Each district with an affordability ratio above the national ratio makes a market signals uplift in proportion to its difference with the national figure;
- 2 Each district with an affordability ratio above the national ratio makes a market signals uplift in proportion to its difference with the national figure (weighted 50%) and its projected household growth (weighted 50%); and
- 3 Every district (whether above or below the national ratio) makes a market signals uplift in proportion to its difference with the lowest affordability ratio, in Copeland at 2.6, (weighted 50%) and its projected household growth (weighted 50%).

- 4.34 The results for the City of York under these methods is shown in Table 8. The uplift has been based on a demographic baseline of 18,000 dpa, based on the projections plus a

vacancy rate. To meet a national figure of 300,000 per annum the scale of uplift would need to be 20% at least, although taking into account the City of York's relative size this could be as high as 30%.

Table 8 Outcomes for the City of York- Apportionment of National Needs

	National total of 300,000		
	Share of 85,000 uplift	Dwellings	Uplift (to 921 dpa)
Method 1	0.22%	189	20%
Method 2	0.21%	182	20%
Method 3	0.33%	278	30%

Source: Lichfields based on ONS/DCLG

- 4.35 The analysis clearly shows that an uplift well in excess of the 15% put forward in the HNU would be needed to reasonable expect an improvement in affordability in the City of York, and for the City to be contributing to the need nationally for new homes, taking into account affordability and its size. It is notable that using a 300,000 per annum total, the uplift for York identified in the Government's standardised methodology – at 30.4% - falls at the very upper end of the range (20%-30%) identified through this exercise.

Summary

- 4.36 In light of the above analysis, there is a case to be made that at the very least, the market signals uplift for the City of York should be a minimum of 20%. Taking a demographic-led baseline of 921 dpa based on the latest projections, this would equate to 1,105 dpa. OBR modelling suggests that an uplift even greater than this may be needed to improve affordability, however in light of stock growth elsewhere and the outcomes of method (3), a minimum of **20%** is considered appropriate.
- 4.37 This clearly underlines the failure of the HNU to adequately meet the PPG requirement to set its uplift at a level that is related to the problems of affordability or that could be expected to improve affordability; indeed, the HNU fails to approach this question at all.
- 4.38 **When applied to Scenario Ci (921 dpa), this results in a need for 1,105 dpa.**

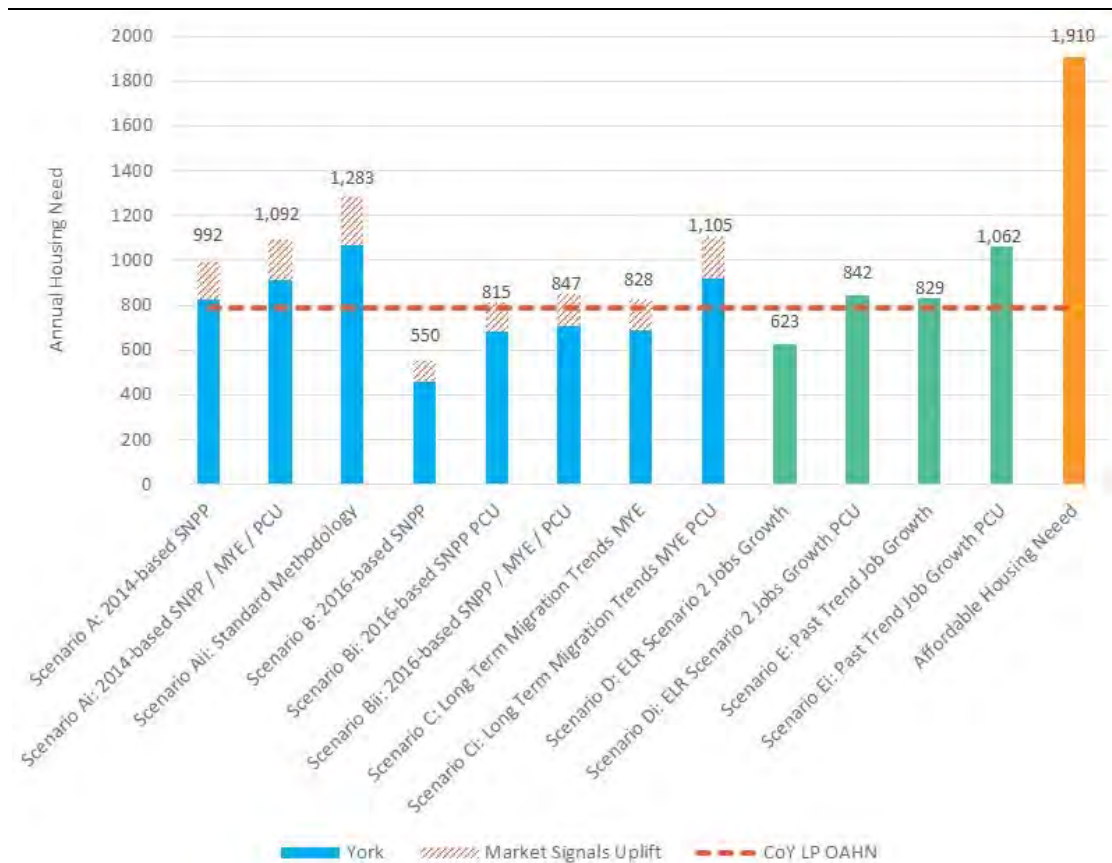
Are Economic Growth Needs Being Addressed?

- 4.39 The Practice Guidance requires plan-makers to assess likely employment growth based on past trends and/or economic forecasts. Where the labour force supply is projected to be less than the forecast job growth, the Practice Guidance states that this could result in unsustainable commuting patterns which could potentially reduce the resilience of local businesses.
- 4.40 A number of scenarios have been modelled to demonstrate the impact of a range of likely growth scenarios based on existing trends, forecasts and economic strategies. These scenarios also show the scale of change that would be required if demographic trends were to be reversed.
- 4.41 The economic forecasts for York indicate that, factoring in accelerated household formation rates, the employment-led figures range from 861 dpa based on the ELR Scenario 2's 650 annual job growth (842 dpa) to 1,062 dpa based on past trends. These are all lower than the level of housing need associated with the uplifted demographic scenario as set out above.

4.42 The implication of this analysis is to demonstrate that the demographic-based projections would support a reasonable level of employment growth, and that no upward adjustment is required to the demographic-based housing need figures to ensure that the needs of the local economy can be met. Conversely, it is important to recognise that the past trends job growth scenario (Ei) generates a level of housing need that is only marginally lower than the demographically-led starting point (Scenario Ci after an adjustment is made for market signals) of 1,105 dpa. Therefore, the OAHN cannot be any less than this as it would not meet the most appropriate employment-led scenario.

4.43 Figure 5 sets out the annual dwelling need under each scenario as identified by Lichfields' modelling work.

Figure 5 Model Outputs for the City of York: Dwellings per Annum 2017-2033



Source: Lichfields Analysis
 Note: The orange boxes on the blue bars relate to the recommended uplift to address worsening market signals

Is there a need to increase housing supply to aid the delivery of affordable housing?

4.44 The Practice Guidance makes clear that the consideration of an uplift in response to market signals and any adjustment to take account of affordable housing need should be undertaken as two discrete stages. The Practice Guidance³⁹ identifies six relevant market signals that are to be considered. Not one of these relates to affordable housing need, i.e. the specific need of those households who lack access to suitable housing (both now and

³⁹ ID 2a-019-20140306

in the future). The assessment of market signals therefore does not include a consideration of affordable housing need. However, affordable housing needs must still be taken into account when determining OAHN.

4.45 Following the discussion on market signals, the Practice Guidance provides an overview of how affordable housing needs are to be assessed. The section closes by stating that:

“An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes”⁴⁰.

4.46 In this regard, and as noted above, the SHMA Update (September 2017) has identified an affordable housing need of 573 dpa. Assuming an optimistic 30% delivery requirement, this would result in need for 1,910 dpa.

4.47 GL Hearn has not allowed for any adjustment to the identified housing need to reflect this level of affordable housing need. We consider that this is a serious misjudgement.

4.48 Lichfields does not consider that it is adequate just to suggest that an uplift for market signals would be sufficient to address affordable housing need. Such an approach is contrary to the Satnam Millennium, Oadby and Wigston and Kings Lynn judgments, all of which require an additional uplift (i.e. as distinct to the market signal adjustment). It also fails to reflect the requirements of the Framework [§47] and the Practice Guidance which clearly show the uplift for market signals to be separate to the adjustment for affordable housing.

4.49 In order to meet the identified level of affordable housing need in full, the bottom end of the range would need to be higher (although it is recognised that at 1,105 dpa, over half of the City’s affordable housing need would be met). The approach of Dove J at Kings Lynn informed the recommendation of LPEG to apply a specific level of uplift in response to identified housing need. Whilst the implication of the Kings Lynn HCJ is that Local Plans are not required to meet their affordable housing needs in full, in this instance, **an uplift of the OAHN by a further 10%, from 1,105 dpa to 1,215 dpa would, in theory, go a meaningful way to ensuring that this can be achieved (based on a 30% delivery rate).**

⁴⁰ ID 2a-029-20140306

5.0 Integration of Student Housing Needs

5.1 It is important to note that the household projections upon which York’s OAHN is based relate to C3 uses only, and not C2. Specifically, and of particular relevance to the City of York, CLG’s household projections do not include an allowance for students who might be expected to reside in Halls of Residence (termed, along with people living in nursing homes, military barracks and prisons, as the ‘Communal establishment population’).

5.2 As summarised by CLG in its *2014-based household projections Methodological Report* (July 2016), the household projections are based on the projected household population rather than the total population. The difference between the two is the population in communal establishments, also termed the ‘institutional’ population. This population comprises all people not living in private households and specifically excludes students living in halls of residence:

“The institutional population is subtracted from the total resident population projections by age, sex and marital status to leave the private household population, split by sex, age and marital status in the years required for household projections.” [page 12]

5.3 This is important for the City of York, because it means that if the household projections are used as the basis for calculating the OAHN (which GL Hearn’s methodology does), it specifically excludes a substantial proportion of specialised student accommodation needs.

5.4 In this regard, it is worth noting that in March 2017 GL Hearn published an addendum to the West Surrey SHMA for Guildford Borough Council⁴¹. In that document, GL Hearn recommended an adjustment of an extra 23 dpa be added to the OAHN of 539 dpa based on an analysis of future student numbers and accommodation need in the Borough.

5.5 According to the GL Hearn’s Guildford analysis, there are three things necessary to consider when determining whether there is a need to adjust the objectively assessed housing need to take account of student growth:

- How the student population at University of Surrey is expected to change over the plan period;
- What growth in typical student age groups is expected within the population projections, on the basis that the CLG Household Projections model is not assuming growth in numbers in institutions;
- The number/ proportion of students which can be expected to require housing within Guildford, and of these what proportion might be expected to be accommodated in halls of residence rather than the wider housing stock.

5.6 This was accepted in the Inspector’s Report dated 27th March 2019, resulting in a new OAHN of 562 dpa. The Inspector concluded that:

“From the figure of 539 dpa resulting from the assessment of jobs-led economic growth, the Council have made a further adjustment of 23 dpa for the growth of the student population based on analysis carried out in the SHMA addendum. Taking the University of Surrey’s known aspirations for growth, it is estimated that the number of full-time Guildford-based students at the University will increase by 3,800 between 2015-34, resulting in additional migration to Guildford. Assuming that 45% would be accommodated in the wider housing market, and on the basis of

⁴¹ GL Hearn (2017): West Surrey Strategic Housing market assessment: Guildford Addendum Report 2017

an average 4 students per household, the SHMA Addendum calculates that this would equate to growth of 23 additional dwellings per annum. It has been argued that the 18 to 23 age group in the most recent population projections and mid-year estimates includes students; but this cannot be assumed to be the case, and by its nature Guildford is likely to be attractive to young people whether or not they are students. It is a sound step to add this allowance for students when considering the overall housing requirement, to ensure that there is not a significant incursion of students into the housing market which would diminish the supply available to others needing housing in the area.”

- 5.7 Given that York has a disproportionately high student population following the ongoing success of the University of York, York St John University, Askham Bryan College of Agriculture and Horticulture and the landmark campus development of York College, it is surprising that GL Hearn did not follow a similar exercise to the one they undertook for Guildford Borough Council.
- 5.8 Using data and assumptions gathered from the University of York, York St John’s University and the City of York Council’s own analysis (*Housing Requirements in York*, produced on its behalf by Arup in 2015) we can make a broad assessment of the housing needs of students in the City of York.
- 5.9 Table 9 presents the past four years of student headcount data for the University of York and York St John University. Over this period the total student headcount grew by 7.2% overall. However, whilst the University of York [UoY] grew its student population by 15.4%, York St John’s University [YSJ] lost 4.7% of its students.
- 5.10 Both universities experienced an expansion in full-time students but a contraction of part-time students. The University of York gained 2,300 full-time students (15.4%) but lost 315 part-time students (-16.4%), whilst York St John’s University gained 235 full-time students (4.3%) but lost more than half of its part-time students.

Table 9 Recent trends in University student headcounts in York 2014/15-2017/18

	2014/15	2015/16	2016/17	2017/18	% Change
The University of York	16,835	17,150	17,895	18,820	11.8%
Full-time	14,920	15,210	16,280	17,220	15.4%
Part-time	1,915	1,940	1,615	1,600	-16.4%
York St John University	6,555	5,975	5,940	6,250	-4.7%
Full-time	5,495	5,180	5,355	5,730	4.3%
Part-time	1,060	795	585	520	-50.9%
Total Full Time	20,415	20,390	21,635	22,950	12.42%
Total Part Time	2,975	2,735	2,200	2,120	-28.74%
Total Students	23,390	23,125	23,835	25,070	7.18%

Source: HESA HE student enrolments by HE provider 2014/15 to 2017/18

- 5.11 For the purposes of this analysis, only full-time students are considered to be part of the additional student population in York living in C2 housing, as part-time students are more likely to be residents already living in York or commuting into the City.
- 5.12 The City of York Council’s 2015 *Housing Requirements Study* assumed (in Appendix B)⁴² that, following consultation with both Universities, 5% of all UoY students live at home or

⁴² Arup (2015): Evidence on Housing Requirements in York: 2015 update, Appendix B

commute into York, whilst 20% of all YSJ students do the same. The 20% figure for YSJ has recently been reiterated in the University’s 2026 strategy, where it is stated that the University aspires to grow to 10,000 students by 2026, with 8,000 of those being “on campus”⁴³. This would be an increase of **3,750** students on the current figure of 6,250.

- 5.13 Applying these assumptions to the 2017/18 total full-time student figure of 22,950 generates a student baseline figure of **20,943** students requiring accommodation within the City (i.e. 95% of UoY’s 17,220 FT students, plus 80% of YSJU’s 5,730 FT students).

Expected Growth in Student Numbers

- 5.14 In a representation submitted to the draft York Local Plan examination in March 2018⁴⁴, the University of York’s planning agents (O’Neill Associates) set out potential growth scenarios for the university up to 2038. Of the six growth scenarios, Scenario 3, which assumed 1.25% student growth p.a. to 2038, and Scenario 4, which assumed 1.5% growth p.a. to 2038 were considered by O’Neill Associates to be “*the minimum prudent scenarios for planning purposes at this stage of the Local Plan*”. Scenario 5, which assumed 2% growth p.a., was also considered to be “*a realistic possibility given it is at a rate equal to half the growth the University has achieved over the last 10 years.*”
- 5.15 The growth scenarios modelled by O’Neill Associates were based on full-time-equivalent [FTE] students and was modelled forward from 2016/17 data. The University of York has since released FTE student data for 2017/18 and 2018/19. Given that growth in FTE students in the past two years has been 4.1% and 3.2% respectively, we have assumed the higher Scenario 5 growth rate of **2% p.a.** over the full Plan period to 2033 is justified for use in this analysis. This equates to a growth of **6,069** on the 2016/17 FT student figure of 16,280.
- 5.16 As set out above, the YSJU 2026 Strategy document (2019) sets out that University’s ambition to grow to 10,000 students by 2026, a growth of 3,750 students from 6,250 in 2017/18 over an eight-year period. Using the average proportion of full-time students at the University from the past four years of HESA data (totalling 88% of all students), this suggests it would be reasonable to work on the basis that 8,800 full-time students will be attending YSJU by 2026, an increase of **3,070 full-time students over eight years**, or 384 students per year until 2025/26.
- 5.17 After 2025/26 we have no data regarding YSJU’s growth plans, so for the purposes of this analysis we have fixed the full-time student number at 8,800 for the remainder of the plan period to 2033 (i.e. zero growth post 2026).
- 5.18 Based on the above assumptions, the expected growth in full-time students over the 16-year Local Plan period 2016/17 – 2032/33 equates to **6,069** for the UoY and **3,445** for York St John (this latter figure includes one years’ growth already documented in Table 9 above, of 375 students between 2016/17 and 2017/18). This totals **9,514** additional FT students based at the two Universities over the 16-year plan period 2016/17 – 2032/33.
- 5.19 Applying the previous assumptions relating to students living at home or commuting to this generates an additional **8,522** full-time students living in York (i.e. 95% of UoY’s 6,069 FT students and 80% of YSJ’s 3,445 FT students).

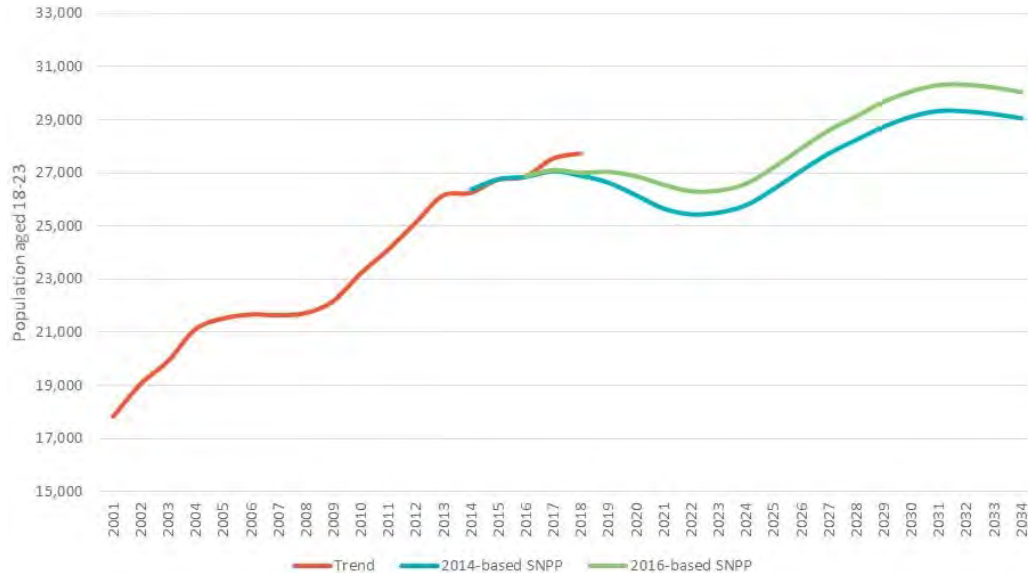
⁴³ York St John University (2019): *2026 Strategy: Make the Possible Happen*, page 26

⁴⁴ O’Neill’s Associates Submission to York Local Plan (2018): *University of York – Growth Rationale for Campus east Extension to the South of the Lake*, page 5

Student Growth within the Demographic Projections

- 5.20 It is reasonable to assume that the 18-23 age cohort will represent the core student age group, particularly for under graduates. This was also the approach GL Hearn followed in its Guildford SHMA Update. Figure 6 illustrates that using either the 2014-based SNPP or the 2016-based SNPP, there is limited growth within this age cohort, particularly over the short to medium term, with growth principally occurring from 2025 onwards. Indeed, from 2017 to 2022, the number of residents in this age group is expected to fall by 1,631 in the 2014-based SNPP, and by 798 residents in the 2016-based SNPP.
- 5.21 Over the 16-year plan period 2016/17 to 2032/33, the projected growth of this age cohort is 3,118 residents (+12%) according to the 2016-based SNPP, or 2,149 (8%) using the 2014-based equivalents. In contrast, the number of full-time students attending the two Universities in York is expected to rise by 9,514 over the same time period, of whom 8,522 are expected to live in the City, an increase of **36% on the 2016/17 figure of 32,357** attending the two York Universities. This represents a rate of growth significantly higher than that of the age cohort in the projections.

Figure 6 Past and Projected Population Growth in York for residents aged 18-23



Source: ONS Mid-Year Population Estimates 2019/2014-based SNPP/2016-based SNPP

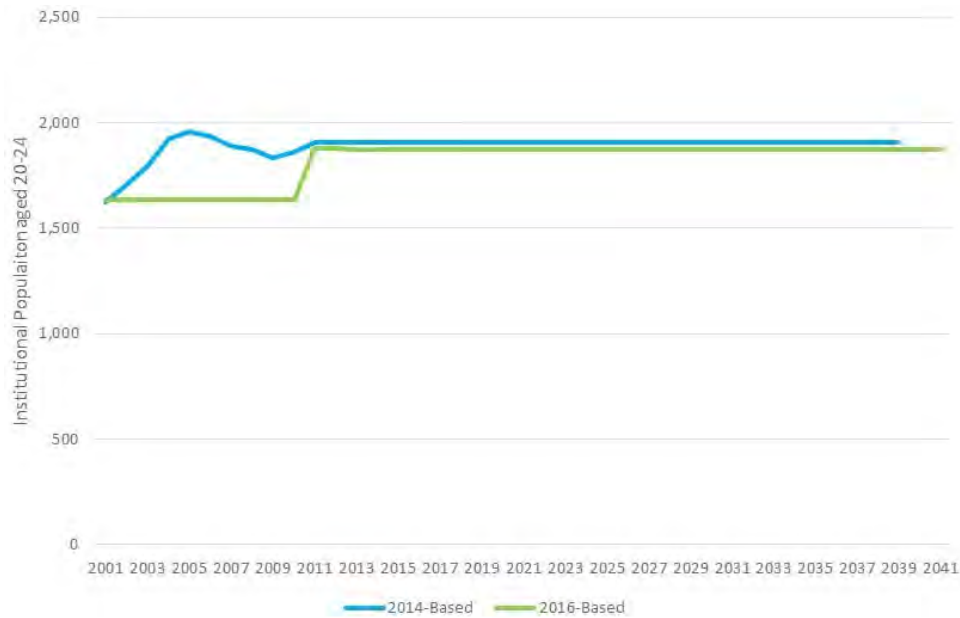
- 5.22 The Figure above includes growth in new student residents and also existing residents who are not in Higher Education. In an attempt to separate out the anticipated growth in students alone in the projections, Figure 7 presents the growth of residents aged 20-24⁴⁵ living in communal establishments in the City of York up to 2039/41. Communal establishments include institutional accommodation such as residential care homes, army barracks, correctional facilities and (of particular relevancy for younger age groups) purpose-built student accommodation (i.e. halls of residence). It is therefore highly likely that most of the population aged 20-24 living in communal establishments can be considered to be students living in purpose-built C2 student accommodation. The data indicates that post 2017, the number of residents aged 20-24 living in communal establishments is anticipated to stay constant, at 1,909 residents in the 2014-based SNPP,

⁴⁵ The ONS / CLG data is grouped together in 5-year age cohorts including 20-24 and not 18-23 year olds; however, it is reasonable to assume that the trends exhibited for this slightly older age group represents a reasonable proxy for student growth

and 1,879 in the 2016-based SNPP. There is therefore no change in the size of this cohort built into either set of projections over the plan period, and so growth in the numbers of students living in purpose-built accommodation clearly play no part in the ONS's anticipated population growth for York residents shown in Figure 6.

- 5.23 From this, it could also be reasonably inferred that the ONS projections have not factored in the strong growth in student numbers at the 2 Universities into their projections, whether they are likely to be living in C2 student accommodation or renting in the private market. Furthermore, the projections suggest a lack of growth in the short-term, whilst growth effects later in the plan period are likely to be largely accounted for by a cohort effect rather than an increase in student migration.

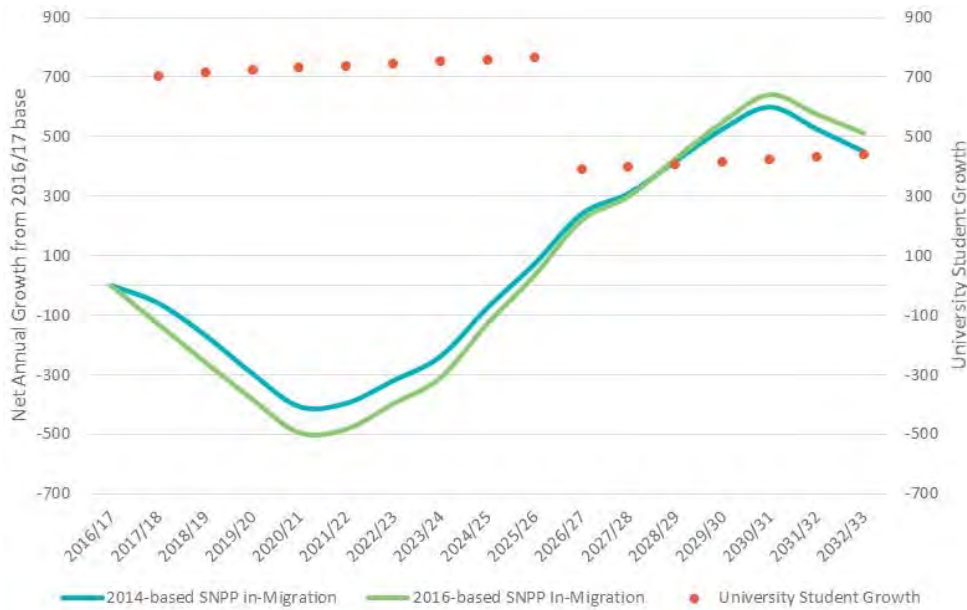
Figure 7 Communal establishment population in York, aged 18-23, 2001-2035



Source: CLG 2014-based SNHP/ ONS 2016-based SNHP

- 5.24 The levels of in-migration of 18-23 year olds into York shown in Figure 8 further support this conclusion. Both projections show a clear decline up to 2025/16 compared to 2017 levels, followed by gradual growth to 2031, whereupon the numbers of domestic in-migrants to the City of York start to decline once more. This is in stark contrast to the expected net increase in Full Time student numbers in the two main Universities, where the main growth is in the first few years of the Plan period, suggesting that they are not adequately reflected in the projections.

Figure 8 Internal and cross-border migration for ages 18-23 migration into York 2017-2041 vs. Anticipated Growth in University Students



Source: ONS 2014-based SNPP/2016-based SNPP / Lichfields Analysis

5.25 Based on this analysis it is reasonable to assume that the rise in the student population would result in additional housing need over and above the need as determined by the 2016-based SNPP in isolation.

Additional Student Accommodation Needs

5.26 In GL Hearn’s 2017 Guildford analysis, 45% of new students were expected to be living in the private rental sector [PRS], based upon the University of West Surrey’s aspiration to house 50%-60% of its students within student accommodation.

5.27 Appendix B in The City of York Council’s 2015 *Housing Requirements Study*⁴⁶ includes an analysis of the proportion of both universities’ students that are living in the PRS between 2010/11 and 2017/18. Over this period the average proportion of students living in the PRS was 56.6% of the total. This figure includes the assumptions relating to students living at home or commuting, and so must be applied to the total additional number of FT students, not just those living in York.

5.28 Applying this assumption to the combined university full-time student growth figure of 9,514 generates an estimated **5,385** additional full-time students likely to be living in the wider housing stock in York over the 16-year plan period, or **337** additional students per year.

5.29 On the basis of an average of 4 students per household (an assumption that was also used by GL Hearn in 2017⁴⁷), this equates to around **1,346** dwellings over the 15-year plan period; an average of **84 dpa** over the plan period 2016/17 - 2032/33.

⁴⁶ Arup (2015): Evidence on Housing Requirements in York: 2015 update, Appendix B

⁴⁷ GL Hearn (2017): West Surrey Strategic Housing market assessment: Guildford Addendum Report 2017

Table 10 Additional student population requiring PRS dwellings in York 2016/17-2032/33

Measure	Total
Additional FT students	9,514
Additional FT students living in York	8,522
Additional FT students living in PRS in York	5,385
Additional dwellings needed	1,346
Additional dwellings needed p.a.	84

Source: Lichfields analysis

Conclusion

5.30

Based on this analysis, it cannot be assumed that the growth in the 18-23 age cohort in the latest population projections includes growth in student numbers, and therefore that there is adequate provision for new student housing within the OAHN. Following this, **it is our recommendation that an additional 84 dpa be factored into the City of York’s OAHN.**

6.0 Factoring in the Backlog

- 6.1 The Explanation to Policy SS1 of the Proposed Modifications to the City of York Local Plan states that “*Following consideration of the outcomes of this work, the Council aims to meet an objectively assessed housing need of 790 new dwellings per annum for the plan period to 2032/33, including any shortfall in housing provision against this need from the period 2012 to 2017, and for the post plan period to 2037/38.*” [paragraph 3.3]
- 6.2 According to PM21a of that document, *the Update to Table 52: Housing Trajectory to 2033 to reflect the revised OAN of 790 dpa*, this shortfall to housing provision equates to 32 dwellings annually between 2017/18 to 2032/33, or 512 dwellings in total over the 16-year Plan period.
- 6.3 Based on the Council’s *Full Year Housing Monitoring Update for Monitoring Year 2018/19* Table 6, this appears to be based on a net dwelling gain of 3,432 dwellings between 2012/13 and 2016/17, against a requirement of 3,950 (790 x 5); therefore a 518 shortfall, or 32 annually.
- 6.4 The Companies have serious concerns regarding the accuracy of this calculation. It appears that the CoYC have included a very substantial amount of C2 student accommodation in these figures, thus reducing the amount of shortfall they include in the annual housing target.
- 6.5 The Housing Monitoring reports produced by the Council seek to legitimise this approach by referring to the PPG, which states that:
- “All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market...*
- To establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of students living in student only households, using the published census data. This should be applied to both communal establishments and to multi bedroom self-contained student flats. Studio flats in mixed developments designed for students, graduates or young professionals should be counted as individual completions. A studio flat is a one-room apartment with kitchen facilities and a separate bathroom that full functions as an independent dwelling”.*⁴⁸
- 6.6 Setting to one side the fact that the household projections which GL Hearn has used to underpin its demographic modelling do not take full account of the needs of students, we are concerned that the Council’s approach is over-emphasising the contribution this source of accommodation is making to housing delivery.
- 6.7 For example, MHCLG publishes Table LT122 annually for every district in the country, which provides a robust and consistent indication of net additional dwellings. This is based on Housing Flows Reconciliation data that have been submitted by CoYC to MHCL annually.

⁴⁸ ID-3-042-20180913

Table 11 Rate of net housing delivery in York, 2012/13-2016/17

Year	MHCLG Net Housing Completions (LT122)	Housing Delivery Test	Council's Local Plan Estimate	
			Net Dwelling Gain	+/-
2012/13	88	n/a	482	+394
2013/14	69	n/a	345	+276
2014/15	284	n/a	507	+223
2015/16	691	691	1,121	+430
2016/17	378	378	977	+599
Total	1,510	-	3,432	+1,922

Sources: MHCLG LT122, Housing Delivery Test Results 2019, CoYC Full Year Housing Monitoring Update for Monitoring Year 2018/19 Table 6

*Difference from HDT figure

- 6.8 To take an example for the year 2015/16, the Council has included an additional 579 units relating to two 'Off campus privately managed student accommodation sites'. The CoYC's Housing Monitoring Update for that year indicates that this includes 579 units on 2 developments, the Yorkshire Evening Press 76-86 Walmgate, for 361 units; and the Former Citroen Garage, 32 Lawrence Street.
- 6.9 Reference to the latter development (planning application reference 13/01916/FULM) indicates that not all of these units are self-contained under the MHCLG's definition:
- "The new managed student accommodation will create 58 student flats (5 and 6 person flats with communal kitchen/living/dining facilities) and 303 self-contained 'studio' flats along with a management suite (office, common rooms etc.), laundry and other ancillary facilities."*⁴⁹
- 6.10 Therefore, as a best case, this site should be contributing a maximum of 315 units (58/5 + 303), not 361 units – a difference of 46 units.
- 6.11 Similarly, the other student development included for 2015/16 on the former Citroen Garage (15/012440/FULM), also includes shared and self-contained flats:
- "The rooms therefore take a variety of forms self-contained or with shared facilities according to circumstances, to respect the heritage constraints and make the most of the accommodation."*⁵⁰
- 6.12 There are also other inconsistencies with the MHCLG's data; so, for example in the CoYC's 2016/17 Housing Land Monitoring Report Update, Table 3 indicates that 977 housing completions were delivered net, compared to just 378 recorded by MHCLG – a **difference of 599 units**. Yet only a proportion of this difference can be explained by the C2 student accommodation, as only 152 units are attributed to this source in Table 3, compared to 571 units from residential use class C3 approvals, plus 252 from relaxed Permitted Development Rights. It is unclear why the MHCLG's figures are so different to the Council's, given that they are both supposed to have been provided by CoYC Officers.
- 6.13 To be robust, it is considered that the MHCLG's figures should be used. As summarised in Table 12, if the Council's OAHN of 790 dpa is applied, the City of York has under-delivered a total of 2,440 dwellings over the past 5 years. Annualised over the 16 years of the Local Plan, this would require an additional 153 dpa. If Lichfields' higher OAHN of 1,215 dpa is applied, this would generate a huge shortfall of 4,565 dwellings, or 285 dpa over the remaining 16 years of the Local Plan.

⁴⁹ Design and Access Statement for Walmgate Student Castle Development, ref: 13/01916/FULM, paragraph 8.02

⁵⁰ Design and Access Statement for St Lawrence WMC, ref: 15/02440/FULM, paragraph 6.2.2

Table 12 Rate of net housing delivery in York against possible policy benchmarks, 2012/13-2016/17

Year	Net Housing Completions	Council's OAHN (790 dpa)		Lichfields' OAHN	
		'Need'	+/-	'Need'	+/-
2012/13	88	790	-702	1,215	-1,127
2013/14	69	790	-721	1,215	-1,146
2014/15	284	790	-506	1,215	-931
2015/16	691	790	-99	1,215	-524
2016/17	378	790	-412	1,215	-837
Total	1,510	3,950	-2,440	6,075	-4,565
Annualised over 16 years	94 dpa	247 dpa	-153 dpa	380 dpa	-285 dpa

Source: MHCLG LT122

7.0 Conclusions on the City of York's Housing Need

- 7.1 The Council's approach to identifying an assessed need of 790 dpa in the HNU is fundamentally flawed. There are a number of significant deficiencies in the HNU which means that it is not soundly based. The scale of objectively assessed need is a judgement and the different scenarios and outcomes set out within this report provide alternative levels of housing growth for the City of York. Lichfields considers these to be as follows:
- 1 **Demographic Baseline:** The 2016-based household projections indicate a net household growth of 458 dpa between 2017 and 2033 (including a suitable allowance for vacant/second homes. Once a suitable adjustment has been made to rebase the projections to the (slightly higher) 2017 and 2018 MYEs, and through the application of accelerated headship rates amongst younger age cohorts, takes the demographic starting point to 706 dpa. However, an analysis of the MYE estimates has raised significant concerns regarding the robustness of the international migration statistics underpinning the 2016-based SNPP. Applying long term trends to international migration levels into York, which are more in line with net migration into the City, this would increase the demographic starting point to **921 dpa**.
 - 2 **Market Signals Adjustment:** GL Hearn's uplift is 15%. However, for the reasons set out above, Lichfields considers that a greater uplift of at least 20% would be more appropriate in this instance. When applied to the 921 dpa re-based demographic starting point, this would indicate a need for **1,105 dpa**.
 - 3 **Employment growth alignment:** The demographic-based projections would support a reasonable level of employment growth at levels above that forecast by the ELR Scenario 2 (which has informed the Local Plan) and past trends. As such, no upward adjustment is required to the demographic-based housing need figure of 1,105 dpa to ensure that the needs of the local economy can be met;
 - 4 **Affordable Housing Need:** The scale of affordable housing needs, when considered as a proportion of market housing delivery, implies higher levels of need well above 1,105 dpa. It is considered that to meet affordable housing needs in full (573 dpa), the OAHN range should be adjusted to 1,910 dpa @30% of overall delivery. It is, however, recognised that this level of delivery is likely to be unachievable for York. Given the significant affordable housing need identified in City of York Lichfields considers that a further 10% uplift would be appropriate in this instance and should be applied to the OAHN, resulting in a figure of **1,215 dpa**.
 - 5 **Student Housing Needs:** household projections explicitly exclude the housing needs of students living in communal establishments. Furthermore, Lichfields' critique of the projections clearly indicates that they do not adequately reflect the Universities' student growth targets. It is calculated that meeting these growth needs would equate to around 1,346 dwellings over the 16-year Plan period, at an average of 84 dpa on top of the 1,215 dpa set out above (i.e. 1,299 dpa).
 - 6 **Rounded, this equates to an OAHN of 1,300 dpa between 2017 and 2033 for the City of York.** This is **22% higher** than the MHCLG standard methodology figure of 1,069 dpa
 - 7 **Shortfall of housing delivery 2012-2017:** The Council is also making provision for past under-delivery between 2012 and 2017. Lichfields has serious concerns about how the CoYC have calculated past housing delivery. Based on GL Hearn's OAHN of 790 dpa, and applying the MHCLG delivery figures, this suggests that an

additional 153 dpa should be added on to the OAHN over the course of the 2017-2033 Plan period to address the backlog in full. If Lichfield’s higher OAHN of 1,300 dpa is applied, this would result in a figure of **285 dpa** to be factored on top.

7.2 This allows for the improvement of negatively performing market signals through the provision of additional supply, as well as helping to meet affordable housing needs and supporting economic growth. Using this figure (of 1,300 dpa plus the unmet need 2012-2017) would ensure compliance with the Framework by significantly boosting the supply of housing. It would also reflect the Framework, which seeks to ensure the planning system does everything it can to support sustainable development.

7.3 This process is summarised in Table 13.

Table 13 Approach to OAN for the City of York 2017-2033

	Dwellings per annum (2017-2033)
Demographic Starting Point (2016-based SNHP)	458 dpa
Adjustments to Demographic-led Needs	921 dpa
Uplift for Market Signals?	1,105 dpa (+20%)
Employment Led Needs	842 dpa – 1,062 dpa
Affordable Housing Needs	1,910 dpa*
Uplift to demographic led needs for Affordable Housing? (rounded)	1,215 dpa
Uplift to address Student Housing Needs	84 dpa
Adjusted OAHN (Rounded)	1,300 dpa
Inherited Shortfall (2012-2017) annualised over the Plan period	153 dpa – 285 dpa
Annual Target (inclusive of shortfall)	1,453 dpa – 1,585 dpa

*Based on an affordable housing net annual need of 573 dpa at a delivery rate of 30%

8.0 **Analysis of the Forward Supply of Housing**

Introduction

- 8.1 Since the submission of the Local Plan in May 2018 the Council has released an updated Strategic Housing Land Availability Assessment (SHLAA) (May 2018). Unlike the previous version of the SHLAA (September 2017), it contains a detailed housing trajectory which sets out the anticipated delivery rates of draft allocations. The SHLAA also sets out the assumptions used in projecting the housing trajectory including lead-in times and build-out rates not previously available for review.
- 8.2 This section critiques the assumptions which underpin the housing land supply, also reiterating points made on other components of the Council's housing land supply which have been carried forward since the previous version of the SHLAA. It is important to be cautious in relation to the likelihood of sites delivering and the scale of that delivery. This is because the purpose of the assessment is to provide a realistic view of whether there is sufficient land available to meet the community's need for housing. If those needs are to be met a cautious approach must be taken.

Delivery Assumptions

Lead-in Times

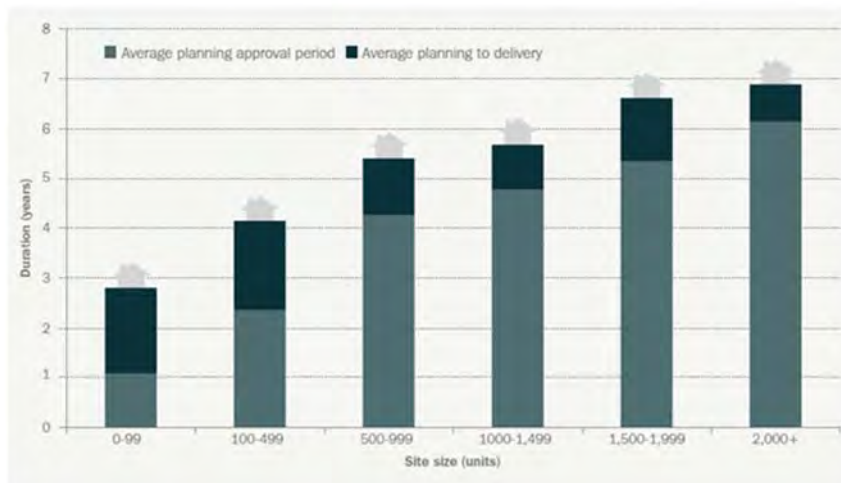
- 8.3 Whilst housebuilders aim to proceed with development on sites as quickly as possible, lead-in times should not underestimate inherent delays in the planning process (e.g. the approval of reserved matter and discharge of planning conditions) as well as the time taken to implement development (e.g. complete land purchase, prepare detailed design for infrastructure, mobilise the statutory utilities and commence development).
- 8.4 The timescales for a site coming forward are very dependent on a number of factors such as a developer's commitment to the site and the cost, complexity and timing of infrastructure as an example. The standard lead-in times should only be applied to sites where developers are actively pursuing development on the site and preparing the necessary planning application. The standard lead in time should not be applied universally and a degree of pragmatism and realism should be applied. Sites where developers have shown limited commitment, for example, should be identified as being delivered later in the trajectory.
- 8.5 Another fundamental element in calculating appropriate lead-in times relates to the size and scale of a site. As a generality, smaller sites can commence delivery before larger sites. Larger sites often have more complex issues that need to be addressed and require significantly greater infrastructure which must be delivered in advance of the completion of housing units. In some cases, the lead-in time on brownfield sites can also be greater given the time required for decommissioning services, demolition, dealing with ground contamination etc.
- 8.6 The SHLAA (2018) sets out the lead-in times which have been applied by the Council in respect of their housing trajectory. The lead-in times are based upon evidence contained within Annex 5 of the SHLAA ('SHLAA Assumptions for Evidence Bases'). The Council states that smaller – medium sites are more likely to come forward within 12 months, larger and 'exceptionally' large sites are more likely to be 12-18 months at a minimum.

8.7 The Council undertook a Housing Implementation Survey in 2015 to help draw together information regarding lead-in times. Our review of these lead-in times suggest that the overall conclusions do not reflect the full extent of the process from submitting a planning application to first completions on site. The lead-in times appear to be ambitious and do not provide a robust set of assumption to base the housing trajectory on.

8.8 Lichfields has undertaken extensive research on lead-in times on a national level with the publication of ‘Start to Finish’⁵¹, which contains robust evidence on typical lead-in times and build-rates. These findings are quoted elsewhere within Lichfield research such as Stock and Flow⁵² which the Council refers to within Annex 5 of the SHLAA. Whilst the Council has referenced this research it is unclear if the findings have been considered when formulating lead-in times. Whilst it is acknowledged by the Council that larger sites can have longer lead-in times it is unclear if any allowances have been made for large sites included within the housing trajectory.

8.9 It is considered that as a starting point the Council should consider the average lead-in times set out within ‘Start to Finish’ which are provided below:

Figure 9 Average Lead in Times



Source: Lichfields analysis, Figure 4 of ‘Start to Finish’

8.10 Lichfields has also provided commentary on lead-in times previously with the Housing Issues Technical Paper (March 2018), which can be found at Appendix 1. This builds upon the findings of Start to Finish to provide more localised commentary. Like Start to Finish an approach was taken to consider lead in times from the submission of the first planning application to the first completion on site. Table 14 provides a summary of these findings.

Table 14 Lead-in Times

Stage of Planning	0-250 units	250-500 units	500+ units
Full Planning Permission	1 year	1.5 years	2 years
Outline Planning Permission	1.5 years	2 years	2.5 years
Application Pending Determination	2.5 years	3 years	3.5 years
No Planning Application	3 years	3.5 years	4 years

Source: Lichfields

⁵¹ Nathaniel Lichfield & Partners (November 2016): *Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?*

⁵² Nathaniel Lichfield & Partners (January 2017): *Stock and Flow: Planning Permissions and Housing Outputs*

- 8.11 Both *Start to Finish* and the assumptions set out within the *Housing Issues Technical Paper* demonstrate that the Council's approach to lead-in times is not robust. There are examples within the trajectory which we consider demonstrate that the Council's current assumptions are ambitious. This includes the proposed lead-in times for proposed allocations ST14 and ST15.
- 8.12 ST14 (Land west of Wigginton Road) has a proposed capacity of 1,348 dwellings, currently there is no application being determined by the Council. Assuming an outline application is submitted in 2019 and following Start to Finish, it would be expected that first completions would be in 2024 (5.5 years).
- 8.13 Similarly, ST15 (land west of Evington Lane) is a proposed new settlement with a capacity of 3,330 dwellings within the emerging plan. There would be significant upfront infrastructure requirements before any housing completions took place. Again, if an outline application is submitted in 2019, and following Start to Finish, it would be expected that first completions would be in 2026 (6.9 years).
- 8.14 It is considered that the position set out above should be adopted when considering lead in times. The Council's current approach does not provide a realistic or robust position when considering likely lead in times. The Council should provide clear justification if there is a departure to these timescales.

Delivery Rates

- 8.15 Whilst housebuilders aim to deliver development on site as quickly as possible, in a similar fashion to the lead-in times outlined above, the annual delivery rate on sites will depend on a number of factors including overall site capacity.
- 8.16 Within the SHLAA (2018) the Council has taken the approach to apply a build out rate to site allocations of 35 dwellings per outlet, per annum. This is applied in multiples as the number of outlets are likely to increase. For larger schemes the Council envisage that there could be up to four outlets after the initial infrastructure phase has been completed.
- 8.17 It is considered that the Council's approach is a reasonable starting point, however, research undertaken by Lichfields demonstrates that build rate assumptions are more complex. Whilst it is acknowledged that larger sites can support more outlets this isn't always the case and will be influenced by the size, form and housing mix of the development. Overall market absorption rates mean the number of outlets is unlikely to be a fixed multiplier in terms of number of homes delivered.
- 8.18 Lichfields has provide commentary on delivery rates previously with the Housing Issues Technical Paper (March 2018). In our experience, sites with a capacity of less than 250 units are built out by one housebuilder using one outlet. As such, a reasonable average annual delivery rate in York is 40 dpa for sites with a capacity of less than 250 units. However, on sites of less than 100 units we have assumed a lower delivery rate of 25 dpa as these sites will generally be delivered by smaller housebuilders.
- 8.19 Generally, in York on sites with a capacity of between 250 units and 500 units there is often a second developer (or national housebuilders use a second outlet) delivering units simultaneously. As such, annual delivery rates increase but not exponentially to the number of housebuilders or delivery outlets. In our experience in the current market, sites with 2 outlets deliver approximately 65 dpa.
- 8.20 Finally, on large-scale sites with a capacity of more than 500 units, there are often up to three housebuilders or outlets operating simultaneously. As before, this does not increase

delivery exponentially, but it can be expected that three outlets operating simultaneously on a large scale would deliver approximately 90 dpa.

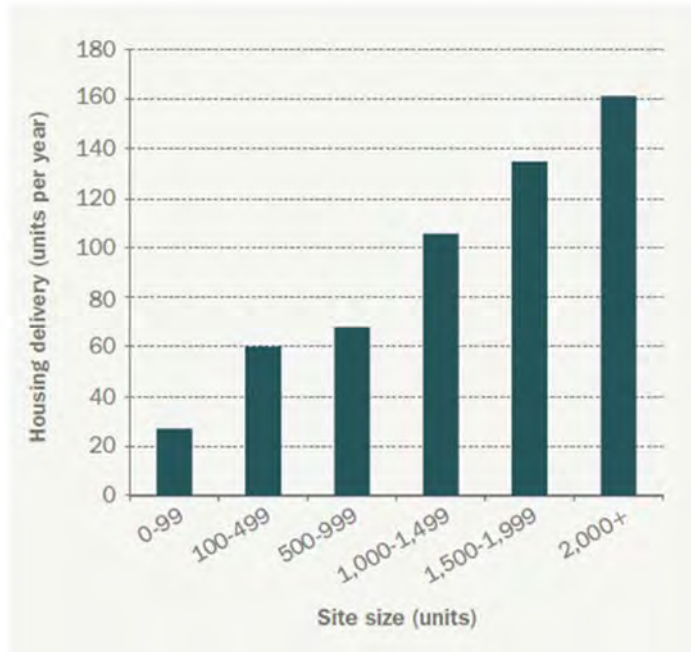
Table 15 Annual Delivery Rates

	0-100 units	100-250 units	250-500 units	500+ units
Annual Delivery	25 dpa	40 dpa	65 dpa	90 dpa

Source: Lichfields

8.21 Furthermore, *Start to Finish* analyses build rates based on national research. Whilst the findings shown in Figure 10 are average figures, it demonstrates that large sites do not necessarily deliver more homes on an exponential basis.

Figure 10 Housing Delivery Rates



Source: Lichfields analysis, Start to Finish

8.22 Lichfields considers that it would be appropriate to apply the delivery rates identified above. The quantum of delivery of units on a site can be affected by a significant number of factors including local market conditions, general economic conditions, proximity to competing site, housing market area, type and quality of unit and the size of the development. There will be a number of sites in York that will experience higher annual delivery rather than the averages outlined above but there will also be a number of who deliver below the average also. It is therefore important not to adopt an average delivery rate which may only be achieved by a small minority of the strategic sites.

Density Assumptions

8.23 The SHLAA (2018) (page 22) sets out the density assumptions for each residential archetype. The assumptions are the same as those contained within the previous SHLAA and based upon the findings of the 2014 Housing Viability Study. Lichfields has commented on the density assumptions for each residential archetypes previously and reiterates these comments below.

- 8.24 It is considered that the proposed densities are overly ambitious and will not be achieved on average on sites throughout York. For example, from our experience, it is not anticipated an average density of 50dph on sites of 1ha+ with a gross to net ratio of 95% can be achieved. Meeting open space requirements alone will preclude this ratio. There will be a very limited number of examples where this density has been achieved but a more appropriate and conservative figure should be pursued in the absence of firm details from a developer. The gross to net ratio at most should be 85%, although this can reduce to less than 60% for larger developments with significant infrastructure requirements.
- 8.25 Secondly, it is considered that a density of 40dph on suburban sites is highly aspirational and is unlikely to be achieved across a significant number of sites. This density is characterised by housing for the smaller households and thus not suitable for family accommodation. Our housebuilder clients and local intelligence has reaffirmed our concerns with the proposed average densities. Unless there is specific evidence to the contrary the default density on suburban sites should be 35 dph.
- 8.26 The Council has not provided sufficient information to back up their assumptions and we consider that these development densities should be revised downwards to ensure that the capacity of sites is not artificially inflated. Assumptions on development densities in the absence of specific developer information should air on the side of caution and we consider that the details in the 2018 SHLAA are at variance with this principle.

Components of the Housing Land Supply

Allocations

- 8.27 The Framework (2012) stresses the intention of the Government to significantly boost the supply of housing. As a consequence, the focus of national policy is to ensure the delivery of housing and in that context. The Framework advises that Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land (paragraph 47).
- 8.28 The definition of deliverability as set out within the NPPF states that to be considered deliverable:
- “sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.”* [Footnote 11]
- 8.29 The Planning Practice Guidance (PPG) sets out further guidance⁵³ in respect of what constitutes a deliverable site. It states:

⁵³ PPG Paragraph: 032 Reference ID: 3-032-20140306

“Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within 5 years.

However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the 5-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. If there are no significant constraints (eg infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a 5-year timeframe.

The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust 5-year housing supply”.

- 8.30 When assessing a 5-year supply position, it is important to be cautious in relation to the likelihood of sites delivering and the scale of that delivery. This is because the purpose of the assessment is to provide a realistic view of whether there is sufficient land available to meet the community’s need for housing.
- 8.31 The Council should adopt a more cautious approach when seeking to include strategic allocations within the five year supply. It is considered that a number of the proposed allocations do not have a realistic prospect of delivering housing within the next five years when applying more robust assumptions in terms of lead-in and build rates.

Sites with Planning Permission

- 8.32 It is now a standard approach that sites with planning permission should be included in the supply (unless there is a good reason to exclude them) whereas sites without planning permission should be excluded (unless there is a good reason to include them). This interpretation is entirely logical as the absence of a planning permission is a clear impediment to development, which is contrary to the test that land should be available now.
- 8.33 As set out within the SHLAA (2018) the Council apply a 10% non-implementation rate to extant planning permissions and site allocations identified for housing development. The evidence which underpins the Council’s justification is set out within Annex 5 to the SHLAA. This has been carried forward into Table PM21d of the Proposed Modifications to the York Local Plan, albeit the Council has also included a separate table (PM21c) which does not include the discount). The addition of the non-implementation is welcomed and is in line with approaches taken elsewhere when reviewing housing delivery.

Windfalls

- 8.34 The Council’s position on windfall allowance is based upon the Windfall Allowance Technical Paper (2017) and remains the same as the previous version of the SHLAA. The Council claims that 169dpa will be delivered on windfall sites from Year 3 of the trajectory (2020/21) and provides justification for their windfall allowance within the Technical Paper.

- 8.35 The Framework⁵⁴ sets out the local planning authorities may make allowance for windfall sites in the 5-year supply if they have compelling evidence that they will provide a reliable source of supply. Furthermore, any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends.
- 8.36 Lichfields accept that windfalls should be included in the overall housing delivery trajectory but only consider that they are appropriate **outwith the first 5-year period**. The inclusion of a significant windfall figure in earlier years increases the likelihood of artificially inflating the housing delivery figures in year 3 and double counting sites with permission. It does not account for any potential delays to the build out sites with extant consent. As such, the windfall allowance should be amended to only make an allowance from Year 5 (2022/23) onwards.
- 8.37 The Council consider that an annual windfall of 169dpa is appropriate to take account of potential delivery on sites of <0.2ha and completions on change of use and conversion sites.
- 8.38 However, the figure of 169 dwellings has only been achieved four times over the past 10 years and only twice since 2012. This is during a period when the application of a very tight inner Green Belt boundary has precluded urban edge development at a time of ever increasing housing demand. In such circumstances it would have been an ideal period for windfall development to increase; but it did not. There is therefore no justification for such a high allowance.
- 8.39 In relation to the delivery on sites of <0.2ha, Lichfields consider that the proposed windfall allowance is too high because tightly defined settlement boundaries in York and surrounding settlements means there is a finite supply of sites which can come forward. This supply has been curtailed by the change in definition of previously developed land (June 2010) to remove garden sites. In addition, the Council started to request small sites to make contributions towards affordable housing provision and required rural sites with a capacity of more than 15 units to provide on-site affordable housing. This has made the provision of units on small sites less attractive to the market. Since the policy change and the introduction of affordable housing contributions the quantum of completions on windfall sites in York has plummeted. As a consequence, the future supply from this source should only consider the average completion rate since 2009/10 of 33dpa.
- 8.40 In relation to the delivery from conversions, the average completion figure in the past three years is largely dependent on recent changes to permitted development rights. As a consequence, it is considered that after an initial surge the conversion rate will revert back to the long term average. It is likely that the optimum conversion sites will be completed in the short term and the less sustainable and attractive office developments in York will not be converted. As such the average conversion rate from 2007/08 to 2013/14 of 64dpa should be used.
- 8.41 Based on the above assessment it is considered that the proposed windfall allowance should be reduced from 169dpa to 100dpa (rounded up from 97) which represents a far more realistic windfall allowance over the plan period. The incorporation of this figure would ensure that the Council's trajectory is not artificially inflated, can be realistically achieved and would only be incorporated into the delivery trajectory at Year 5 (2022/23) to ensure no double counting.

⁵⁴ NPPF (2019), §70

- 8.42 It is considered that the Council's information does not adequately justify a windfall allowance of 169dpa and does not provide sufficient certainty that this figure will be achieved over the plan period.
- 8.43 Therefore, in this instance we consider that it is not appropriate that the City of York includes a windfall allowance within the first 5 years of the plan period. We reserve the right to revise our position on windfalls if the Council prepares and releases further justification.

Under Supply

- 8.44 The PPG⁵⁵ states that the level of deficit or shortfall should be added to the plan requirements for the next five- year period where possible (Sedgefield approach). If LPAs are minded to deal with the shortfall over a longer period (Liverpool method) the Practice Guidance advises that Local Authorities work with neighbouring authorities under the duty to cooperate.
- 8.45 It is stated within the SHLAA (2018) that the Council has adopted the 'Liverpool' method when dealing with past under delivery. Whilst the Council state there are 'local circumstances' which warrant a longer-term approach, it is not clear where the justification is which wants the Liverpool method. It is considered that further information should be provided by the Council which justifies a departure from addressing the shortfall within the next five- year period.
- 8.46 PM21d of the Proposed Modifications sets out the Council's latest housing trajectory which utilises the Liverpool method. The Council states that the inherited shortfall from the period between 2012 – 2017 (prior to plan period of Local Plan) is 518 dwellings. Lichfields has concerns that the way in which the Council has calculated historic housing completions, shown within table 5 of the SHLAA (2018), is flawed and is inflated through the inclusion of privately managed off-campus student accommodation. Furthermore, in line with both the 2014 and latest 2019 iterations of the PPG, Lichfields considers that the Council should deal with backlog in full against planned requirements within the first 5 years of the plan period (i.e. the 'Sedgefield' approach to backlog).
- 8.47 Table 2 of this report shows past delivery against the Council's possible policy benchmarks for the period 2004/05 – 2015/16. It demonstrates that the inherited shortfall is significantly higher than current accounted for by the Council. This will have an impact on the Council's five- year supply calculation, with the potential requirement for more sites to be identified to meet the undersupply and the housing requirement moving forward.

Application of the Buffer

- 8.48 As shown on Figure 2 of this report, the Council has a record of persistent under-delivery over the past 10 years. Only once (in 2017/18) since 2006/07 has the Council actually delivered more than 691 dwellings in a single year. The Council also confirms that there is a history of under-delivery within the SHLAA (2018). In line with paragraph 47 of the NPPF (2012) the Council should apply a 20% buffer to provide a realistic prospect of achieving the planned supply.
- 8.49 In respect of applying the buffer, it should be applied to both the forward requirement and the under-supply. This approach accords with the Framework, which suggests that the buffer should be added to the total requirement which would, inevitably, include any

⁵⁵ Paragraph: 035 Reference 3-035-20140306

under delivery from earlier years. In this regard, the purpose of the buffer is to increase the supply of land; it does not change the number of houses required to be built within that period. Put simply, the buffer is not, and it does not become, part of the requirement; it is purely a given excess of land over the land supply necessary to permit the identified need for housing to be delivered.

Calculating Housing Land Supply

- 8.50 Lichfields has concerns in respect of the way in which the Council has calculated its five-year housing land supply. Table 6 of the SHLAA (2018) and Table PM21c/d of the Proposed Modifications sets out the Council’s assessment of its position and has projected forward a five- year supply for the years 2018/19 to 2022/23. However, the calculation sets out a supply figure over a six- year period (2017/18 – 2022/23) as opposed to a five- year period (2018/19 – 2022/23).
- 8.51 It is also unclear how the Council has arrived at its proposed 6.38 years supply, including the additional 0.38 years as a result of a remaining oversupply. It is considered that the Council’s approach of calculating its 5YHLS does not accord with the 2014 PPG / 2012 NPPF approach to calculating housing supply. The Council must provide more detail on how the it has arrived at the stated five- year supply figure.
- 8.52 For comparison, we set out below our understanding of the Council’s housing land supply calculation for the five- year period 2017/18 – 2021/22 using data from Table PM21c and PM21d of the Proposed Modifications to the York Local Plan. This calculation is for illustrative purposes only and based on the Council’s completion figures without any amendments. We have utilised the Council’s OAHN assumption of 790 dwellings and applied the Sedgfield method to calculate inherited shortfall.

Table 16 Five year housing land supply calculation - based on figures within SHLAA (2018)

Five year housing land supply calculation		Dwelling Number
A	Annual housing target across the Plan period	790
B	Cumulative target (2017/18 – 2021/22)	3,950
C	Inherited shortfall (2017/18 – 2021/22)	518
D	20% buffer	894
E	Five- year requirement (B+C+D)	5,362
F	Total estimated completions (2017/18 – 2021/22) (Figure 6)	5,346
G	Supply of deliverable housing capacity	4.99 years

Source: Lichfields analysis

- 8.53 Table 17 sets out the Council’s 5YHLS for the period 2017/18 – 2021/22, based on Lichfields’ conclusions on the Council’s housing need and inherited shortfall (2012 – 2017). The calculation utilises the Sedgfield method of addressing the full backlog, whilst a 20% buffer has been applied and the windfall allowance has been excluded as set out within this report. The calculation below uses the Council’s evidence base in terms of projected completions from the SHLAA (2018) / York Local Plan Proposed Modification updated Figure 6. Lichfields reserves the right to interrogate the Council’s supply in more detail prior to the EiP.

Table 17 Five year housing land supply calculation - Lichfields OAHN

Five year housing land supply calculation		Dwelling Number
A	Annual housing target across the Plan period	1,300
B	Cumulative target (2017/18 – 2021/22)	6,500

Five year housing land supply calculation		Dwelling Number
C	Inherited shortfall (using Lichfields OAHN)	3,068
D	20% buffer	1,914
E	Five- year requirement (B+C+D)	11,482
F	Total estimated completions (2017/18 – 2021/22) (Figure 6)	5,008
G	Supply of deliverable housing capacity	2.18 years

Source: Lichfields analysis

8.54 Table 17 clearly demonstrates that the Council cannot demonstrate a 5YHLS based upon Lichfields OAHN. Furthermore, based on the Council’s own housing trajectory (updated figure 6) they do not have an adequate cumulative housing supply across the plan period up to 2032/33 (16,685 dwellings) to meet the Lichfields OAHN figure of 1,300 dpa (20,800 dwellings + backlog). There would be a very significant shortfall of 4,115 dwellings even before any inherited backlog is added. This demonstrates that the Council must identify additional deliverable sites in its emerging Local Plan.

Conclusion

8.55 Lichfields has undertaken an analysis of the SHLAA (2018) and Proposed Modifications to the Local Plan which sets out the assumptions used to calculate the Council’s housing land supply.

8.56 The Council states that the inherited shortfall from the period between 2012 – 2017 is 518 dwellings, based on a lower OAHN of 790 dwellings. Lichfields has concerns that the way in which the Council has calculated historic housing completions, shown within table 5 of the SHLAA (2018) and Tables PM21c/d of the Proposed Modifications to the Local Plan, is flawed and is inflated through the inclusion of privately managed off-campus student accommodation.

8.57 We consider that some of the suggested delivery rates on proposed allocations are unrealistic and not based on robust assumptions. The evidence provided by the Council is not sufficient to demonstrate that the housing requirement over the first 5 years of the Plan will be achieved.

8.58 It is understood that there are a number of sites which are proposed to be allocated but have yet to have an application submitted. In order help ensure a 5 YHLS, the Council should demonstrate that there is a realistic prospect that housing will be delivered on site within five years. Lichfields has concerns regarding the Council’s approach to calculating its five- year housing land supply, including the way in which the Council has calculated historic housing completions.

8.59 Lichfields reserves the right to update the above evidence as and when further information becomes available.

9.0 Overall Conclusions and Recommendations

Conclusions on the City of York’s Housing Need

- 9.1 The Council’s approach to identifying an assessed housing need of 790 dpa in the HNU is fundamentally flawed. There are a number of significant deficiencies in the HNU which means that it is not soundly based. The scale of objectively assessed need is a judgement and the different scenarios and outcomes set out within this report provide alternative levels of housing growth for the City of York. Lichfields considers these to be as follows:
- 1 **Demographic Baseline:** The 2016-based household projections indicate a net household growth of 458 dpa between 2017 and 2033 (including a suitable allowance for vacant/second homes. Once a suitable adjustment has been made to rebase the projections to the (slightly higher) 2017 and 2018 MYEs, and through the application of accelerated headship rates amongst younger age cohorts, this takes the demographic starting point to 706 dpa. However, an analysis of the MYE estimates has raised significant concerns regarding the robustness of the international migration statistics underpinning the 2016-based SNPP. Applying long-term trends to international migration levels into York, which are more in line with net migration into the City, this would increase the demographic starting point to **921 dpa**.
 - 2 **Market Signals Adjustment:** GL Hearn’s uplift is 15%. However, for the reasons set out above, Lichfields considers that a greater uplift of at least 20% would be more appropriate in this instance. When applied to the 921 dpa re-based demographic starting point, this would indicate a need for **1,105 dpa**.
 - 3 **Employment growth alignment:** The demographic-based projections would support a reasonable level of employment growth at levels above that forecast by the ELR Scenario 2 (which has informed the Local Plan) and past trends. As such, no upward adjustment is required to the demographic-based housing need figure of 1,105 dpa to ensure that the needs of the local economy can be met;
 - 4 **Affordable Housing Need:** The scale of affordable housing needs, when considered as a proportion of market housing delivery, implies higher levels of need well above 1,105 dpa. It is considered that to meet affordable housing needs in full (573 dpa), the OAHN range should be adjusted to 1,910 dpa @30% of overall delivery. It is, however, recognised that this level of delivery is likely to be unachievable for York. Given the significant affordable housing need identified in City of York Lichfields considers that a further 10% uplift would be appropriate in this instance and should be applied to the OAHN, resulting in a figure of **1,215 dpa**.
 - 5 **Student Housing Needs:** household projections explicitly exclude the housing needs of students living in communal establishments. Furthermore, Lichfields’ critique of the projections clearly indicates that they do not adequately reflect the Universities’ student growth targets. It is estimated that meeting these growth needs would equate to around 1,346 dwellings over the 16-year Plan period, at an average of **84 dpa** on top of the 1,215 dpa set out above (i.e. **1,299 dpa**).
 - 6 **Rounded, this equates to an OAHN of 1,300 dpa between 2017 and 2033 for the City of York.** This is **22% higher** than the MHCLG standard methodology figure of 1,069 dpa.
 - 7 **Shortfall of housing delivery 2012-2017:** The Council is also making provision

for past under-delivery between 2012 and 2017. Lichfields has serious concerns about how the CoYC have calculated past housing delivery. Based on GL Hearn's OAHN of 790 dpa, and applying the MHCLG delivery figures, this suggests that an additional 153 dpa could be added on to the OAHN over the course of the 2017-2033 Plan period to address the backlog in full. If Lichfields' higher OAHN of 1,300 dpa is applied, this would result in a figure of **285 dpa** to be factored on top of the OAHN.

- 9.2 This allows for the improvement of negatively performing market signals through the provision of additional supply, as well as helping to meet affordable housing needs and supporting economic growth. Using this figure (of 1,300 dpa plus the unmet need 2012-2017) would ensure compliance with the Framework by significantly boosting the supply of housing. It would also reflect the Framework, which seeks to ensure the planning system does everything it can to support sustainable development.

Conclusions on the 5YHLS and Forward Supply of Housing

- 9.3 Lichfields has undertaken an analysis of the SHLAA (2018) and Proposed Modifications to the Local Plan which set out the assumptions used to calculate the Council's housing land supply.
- 9.4 The Council state that the inherited shortfall from the period between 2012 – 2017 (prior to plan period of Local Plan) is 518 dwellings. Lichfields has concerns that the way in which the Council has calculated historic housing completions, shown within table 5 of the SHLAA (2018) and Tables PM21c/d of the Proposed Modifications to the Local Plan, is flawed and is inflated through the inclusion of privately managed off-campus student accommodation.
- 9.5 We consider that some of the suggested delivery rates on proposed allocations are unrealistic and not based on robust assumptions. The evidence provided by the Council is not sufficient to demonstrate that the housing requirement over the first 5 years of the Local Plan will be achieved.
- 9.6 In line with the NPPF (2012) the Council should provide clear evidence that housing completions on sites will begin within five years. It is understood that there are a number of sites which are proposed to be allocated but have yet to have an application submitted. It is therefore up to the Council to demonstrate that there is a realistic prospect that housing will be delivered on site within five years.
- 9.7 Lichfields has concerns regarding the Council's approach to calculating its five- year housing land supply, including the way in which the Council has calculated historic housing completions.
- 9.8 Lichfields reserves the right to update the above evidence as and when further information becomes available.
- 9.9 Based on the OAHN Of 1,300 dpa identified by Lichfields, the assessment in this report clearly demonstrates that the Council cannot demonstrate a 5 YHLS.

Recommendations

- 9.10 Taking into account the above matter it is considered that City of York Council should:
- 1 Revisit the evidence base which underpins the minimum housing requirement figure of 790 dwellings, taking on board Lichfields' analysis which sets out that the

Council's OAHN is in the region of 1,300 dpa plus the housing backlog from 2012-2017.

- 2 Identify additional housing sites to meet the significant shortfall in housing need (between 2012 – 2017) and the higher annual requirement identified as part of the Lichfields' analysis of the Council's housing evidence base.
- 3 Revisit the 5YHLS assumptions which the housing trajectory is based upon to ensure they are robust and sufficient housing is identified to provide five years' worth of housing against requirement, plus delivering sufficient homes to meet the housing requirement across the plan period.

9.11 It is clear from analysis of the Council's evidence base that the approach to identifying an OAHN is not compliant with the Framework. The Council are not planning to deliver a sufficient supply of housing to meet the districts OAHN as identified by Lichfields. Furthermore, there are doubts that the housing trajectory is based on robust assumptions and therefore the Council's ability to deliver a five-year housing land supply or meet the housing requirement across the plan period.

9.12 The Council should therefore revisit their housing requirement and also seek to identify additional land to meet the housing needs of the district. In order to ensure an overall strategy that is deliverable and sufficiently flexible to respond to change. This will ensure compliance with the Framework by significantly boosting the supply of housing.

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From: Dave Merrett [REDACTED]
Sent: 22 July 2019 20:38
To: localplan@york.gov.uk
Subject: Local Plan revisions 2019 - York & District Trades Union Council objection
Attachments: York Draft Local Plan Revisions Jul 2019 - YTUC submission.docx

Follow Up Flag: Follow up
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Hi,

Please find attached a submission objection from York & District Trades Union Council to the Local Plan revisions which we consider unsound, unjustified and not effective for the reasons indicated. We would continue to wish to have the opportunity to speak at the enquiry.

Would welcome a confirmation by return that this e-mail, and its attachment has been successfully received.

Thanks - Dave Merrett
Environment Officer
Y&D TUC

York Draft Local Plan – Proposed Revisions - Objection

York Trades Union Council (TUC) remain gravely concerned about the proposed Local plan and wish to object even more strongly to the further downward revisions in the housing numbers that are proposed in the Council's current consultation. These changes are unsound, and not justified by the evidence. We do however welcome the abandonment of the proposal to use the Strensall Barracks site itself for new housing, which may help to protect some significant numbers of MoD jobs in the City, besides helping to protecting the Strensall SSSI.

Economy & Housing

We reiterate our previous point that that there are close linkages between these two issues. House prices and affordability ratios continue to worsen, and low paid work in York is spreading. The proposed amendments significantly worsen a plan that already failed to provide enough housing of the right sort, and particular affordable / social housing for the future, for the reasons we previously stated. We also note that the Council, in its latest revisions, has flown in the face of Government Guidance to use the existing NPPF rules applicable at the time of submission. We continue to strongly support a new Local Plan to deliver at least the Government's previously estimated 1070 houses a year, with a higher proportion of that total being delivered as affordable and social housing, particularly for families, with stronger policies and/or dedicated land allocations to deliver that.

On the York economy, the city has continued its exceptional high rate of loss of offices due to the financial attraction of housing conversion, strengthening both our previous calls to increase housing provision to meet need and thereby reduce this pressure, and for the Council to introduce a local plan policy to protect the residual offices in the city centre / gain an exemption from the Government's relaxation, at least until new offices are provided on the York central site (which we support). We are aware that potential inward office moves are being thwarted by the lack of suitable office accommodation, including for rail jobs in particular. We are very concerned about this undermining the retention of York's current professional rail jobs agglomeration if this situation continues, and if an adequate future supply of replacement sites is not delivered. In this regard we would draw the attention of the inspector to the recently granted planning permission for York Central, which only guarantees a significantly reduced level of new office accommodation, meaning that the current draft plan no longer guarantees the necessary level of provision the evidence base supported.

We also reiterate our previous comments on other deficient aspects of the draft Local Plan.

From: localplan@york.gov.uk
Sent: 22 July 2019 18:04
To: localplan@york.gov.uk
Subject: FW: Response to CYC Local Plan Proposed Modifications Consultation OBO Northminster Ltd
Attachments: Northminster Proposed Mods Response 220719.pdf; Northminster Proposed Mods Response Form 220719.pdf
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From: Kathryn Jukes [REDACTED]
Sent: 22 July 2019 14:11
To: localplan@york.gov.uk
Subject: Response to CYC Local Plan Proposed Modifications Consultation

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Good afternoon
Please find attached our response to the current consultation on the City of York Local Plan Proposed Modifications.
We look forward to receiving confirmation of receipt in due course.

Kind regards
Kathryn

Kathryn Jukes BA (Hons) DipTP MRTPI
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City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

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To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
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First Name		Kathryn
Last Name		Jukes
Organisation (where relevant)		Directions Planning Consultancy Ltd
Representing (if applicable)		Northminster Ltd
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Address – line 4		
Address – line 5		
Postcode		██████████
E-mail Address		██
Telephone Number		██

Representations must be received by Monday 22 July 2019, up until midnight.

Representations received after this time will not be considered duly made.

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

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Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

Please see attached letter

Document:

Please see attached letter

Page Number:

Please see attached letter

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4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

What makes a Local Plan "sound"?

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Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared **Justified**

Effective **Consistent with national policy**

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

Please see attached letter

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

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7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To take part in discussions in order to make clear our concerns.

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

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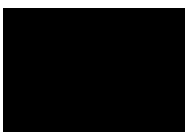
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Signature



Date 22/07/19

**RESPONSE TO THE PROPOSED MODIFICATIONS
CONSULTATION**

CITY OF YORK LOCAL PLAN

**PREPARED ON BEHALF OF
NORTHMINSTER LTD**



Prepared By:
Kathryn Jukes BA (Hons) DipTP MRTPI
23 Victoria Avenue
Harrogate
HG1 5RD



22 July 2019

INTRODUCTION

Directions Planning Consultancy has been instructed in behalf of Northminster Ltd to review the Proposed Modifications and new evidence, and respond to the latest consultation on the draft City of York Local Plan.

COMMENTS ON THE PROPOSED MODIFICATIONS

Our comments relate to the Proposed Modifications Consultation document, and the associated evidence base. Wherever possible, we have referred to the Proposed Modifications and the documents to which our comments relate.

PM25 Policy D4: Conservation Areas

This proposed modification is intended to clarify how the policy is expected to apply to all types of planning application, and not just outline applications. However, we believe this modification misses the point of why the policy was originally worded in the manner it appears in the submitted version of the Plan.

Typically, local planning authorities do not accept outline planning applications within conservation areas because it is not possible to assess the impact of a proposal without full design details. As such, it is usual that only full applications can be submitted within conservation areas, and outline applications are usually always rejected. The original policy was therefore intended to make clear the explicit support for the submission of outline applications where detailed design information is included as part of the application pack.

The proposed modification has now changed the essence of the policy, as it no longer is explicit in regards to how outline planning applications will be accepted within conservation areas where full design details are submitted in support. We therefore believe the proposed modification is unhelpful as the meaning of the policy has been altered so the original objective of the policy no longer exists. The Policy is, therefore, no longer effective.

Test of Soundness

Consequently, we would kindly ask that the modification is rejected in favour of retaining the original wording for the Plan to be considered sound.

Addendum to Topic Paper 1: The Approach to Defining York's Green Belt

We are extremely concerned with the Council's approach to introducing modifications to Green Belt boundaries at such a late stage in the process, and also the nature of the Addendum and the information provided within the Appendices.

The proposed modifications to the boundaries that appear within the consultation documents are based on evidence set out in an Addendum to the City of York Local Plan Topic Approach to Defining York's Green Belt (2018) that has been prepared in response to initial concerns raised by the Inspectors in regards to how the Council has approached Green Belt policy. Paragraph 1.2 of the 2019 Paper makes clear how the Addendum is intended to set out specifically "the methodology and evidence for the setting of inner and outer Green Belt boundaries; the exceptional circumstances test for the removal of land from the Green Belt; the approach to Urban Areas within the Green Belt; and the allocation of strategic sites within the general extent of the Green Belt." Additionally, paragraph 2.4 sets out how

“This addendum explains how and where detailed inner and outer Green Belt Boundaries have been defined through the Local Plan.”

Our understanding of the meaning of an ‘Addendum’ is that it is usually an item to be added to a document to correct an error or for clarification, but in this instance the addendum extends to 89 pages with six appendices attached. For an addendum, it is rather hefty. Additionally, many of the matters raised represent wholly new evidence rather than corrections or points of clarity. As such the Addendum raises new evidence at an extremely late stage in the process that is fundamental to the Council’s ability to make decisions concerning Green Belt boundaries. Quite simply, the modifications being proposed to the boundaries should not need to be introduced at such a late stage in the process, as the work should have been completed before the Plan was finalised and submitted for Examination.

By attempting to fill gaps within the evidence base, rather than simply provide greater clarity to matters previously covered in the Green Belt Topic Paper published in 2018, it appears the Council is attempting to retrospectively justify decisions previously made. Additionally, the Council is setting out evidence that should have been collated, analysed and consulted upon before such an advanced stage in the process. The NPPF (2012) makes clear under paragraph 158 how local plans should be based on adequate, relevant and up to date evidence. In addition, paragraph 152 explains how local plans should be justified whereby reasonable alternatives have been taken into account and on the basis of proportionate evidence. We therefore believe the evidence now presented through the Addendum is pertinent to decisions that were made at previous stages of the Plan process. Given that the Addendum has only just been produced then the Plan, as submitted, cannot be considered to have been drafted on the necessary evidence required for the Plan to be effective or justified. The implications of the Addendum are significant, especially as Green Belt policy is of national significance, so we are most concerned at the Council’s less than attentive approach to date.

We are also concerned that the current consultation does not provide an opportunity to comment on the Council’s approach in general to defining Green Belt boundaries. For example, the methodology adopted as the basis for the assessment of sites set out in Appendix 5 is wholly new. As part of this consultation, the Addendum only assesses the allocations found in the submitted local plan where the site sits within the general extent of the Green Belt, or else the inner and outer boundary. There is no general assessment as to whether any other land fails to fulfil the purposes of Green Belt policy, and should be actively excluded, such as the land identified at earlier stages of the process for safeguarding.

Consequently, the Council’s Green Belt assessment still falls short of what might be expected of a comprehensive assessment through which detailed boundaries are to be set for the first time. Especially, as the Addendum fails to explain how the Council did intend to safeguard land for development at an earlier stage of the process, but then decided against the idea in favour of allocating land for development for a period of five years beyond the end of the Plan period. The effect of which is that the Plan pre-determines the strategy of the next Local Plan, and allocates in excess of 4000 more homes than is necessary to meet the identified housing target, as set out in the submitted version of the Plan. As such, the current consultation on the Addendum raises fundamental questions concerning the Plan in general. However, we understand from the Inspector’s letters and the introduction to the consultation documents how the current consultation is only intended to provide an opportunity for comment on the new evidence and the proposed modifications, rather than the Plan in

general. We are therefore highly concerned that the current consultation has made the whole process unsound, because the implications of the new evidence extend much wider than simply the proposed modifications. The latest evidence is fundamental to justifying the Plan, but the timing of the Addendum and other evidence means that this important evidence did not inform the drafting of the Plan. The NPPF and the various Acts make clear that Plans should be underpinned by relevant and up to date evidence (para 158, NPPF, 2012) yet the evidence has been prepared after the submission of the Plan. As such, the Plan can only be considered to be unsound, because its drafting has not been based on the evidence. Instead, the evidence is being used to retrospectively justify the Plan.

We understand from reading correspondence from the Inspectors to the Council how concern has been expressed with regards to the lack of clear evidence to explain how the Council has defined boundaries, or to justify the release of land within the general extent of the Green Belt for development. We do, however, believe there is a more fundamental issue with the Council's approach to Green Belt, which is how the Plan fails to address the matter of permanence in respect of Green Belt boundaries. It is known that the Council has received a Barrister's opinion, which makes clear how the Plan cannot be considered to be sound without safeguarding land in order to ensure the Green Belt boundaries will endure. Yet the Council has ignored the advice in favour of allocating land in excess of what is reasonably required to deliver housing need within the Plan period. The intention of allocating the additional land appears to be in order to provide a supply of land for development beyond the Plan period. It is expected the additional land might last five years beyond the Plan period, but we do not believe a supply of land for five years is sufficient given boundaries are expected to endure for at least ten years.

Also, the annual target is not yet known beyond the end of the Plan period, so there is no certainty that the allocations would last five years. Consequently, we believe the approach is unsound because it is contrary to the NPPF, which sets out how local authorities should determine a strategy for the defined period of time and allocate land to help deliver the strategy. In addition, the NPPF makes clear how boundaries should be permanent and endure. The current approach adopted by the Council is clearly not consistent with national policy.

Test of Soundness

We understand how we are expected to explain what changes should be made to the Plan in order for it to be found sound. In respect of the Council introducing evidence at such a late stage in the process, we believe the Plan should be withdrawn in order for Regulation 19 consultation to be undertaken again. The purpose being is to provide an opportunity for comments to be made in respect of the implications of the drafting of the Plan in general in light of the new evidence.

For the Plan to be found sound, we also believe the Council needs to safeguard land, in order to comply with paragraph 85 of the NPPF (2012) to ensure the Green Belt boundaries will endure beyond the end of the Plan period, and can be considered to be permanent.

From: localplan@york.gov.uk
Sent: 22 July 2019 18:03
To: localplan@york.gov.uk
Subject: FW: Response to CYC Local Plan Proposed Modifications Consultation OBO JRHT
Attachments: JRHT Proposed Mods Response 220719.pdf; JRHT Proposed Mods Response Form 220719.pdf

Follow Up Flag: Follow up
Flag Status: Completed

From: Kathryn Jukes [REDACTED]
Sent: 22 July 2019 14:11
To: localplan@york.gov.uk
Subject: Response to CYC Local Plan Proposed Modifications Consultation

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good afternoon

Please find attached our response to the current consultation on the City of York Local Plan Proposed Modifications.

We look forward to receiving confirmation of receipt in due course.

Kind regards
Kathryn

Kathryn Jukes BA (Hons) DipTP MRTPI
Director
Directions Planning Consultancy Ltd

[REDACTED]
[REDACTED]
[REDACTED]
Web: www.directionsplanning.co.uk



 Before printing, think about the environment

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Directions Planning Consultancy Ltd. Registered in England & Wales No. 7455434. VAT Registration No: 250 3137 46. Registered office: 23 Victoria Avenue, Harrogate, HG1 5RD

City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Ms
First Name		Kathryn
Last Name		Jukes
Organisation (where relevant)		Directions Planning Consultancy Ltd
Representing (if applicable)		Joseph Rowntree Housing Trust
Address – line 1		██████████
Address – line 2		██████████
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		██████████
E-mail Address		████████████████████
Telephone Number		████████████████████

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Guidance note

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Document:

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Yes No

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5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared **Justified**

Effective **Consistent with national policy**

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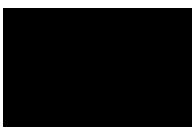
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Signature



Date 22/07/19

**RESPONSE TO THE PROPOSED MODIFICATIONS
CONSULTATION**

CITY OF YORK LOCAL PLAN

**PREPARED ON BEHALF OF
JOSEPH ROWNTREE HOUSING TRUST**



Prepared By:
Kathryn Jukes BA (Hons) DipTP MRTPI
23 Victoria Avenue
Harrogate
HG1 5RD



22 July 2019

INTRODUCTION

Directions Planning Consultancy has been instructed in behalf of Joseph Rowntree Housing Trust to review the Proposed Modifications and new evidence, and respond to the latest consultation on the draft City of York Local Plan.

COMMENTS ON THE PROPOSED MODIFICATIONS

Our comments relate to the Proposed Modifications Consultation document, and associated evidence base. Wherever possible, we have referred to the Proposed Modifications and the documents to which our comments relate.

PM3 Explanation of City of York Housing Needs

A number of the proposed modifications are intended to seek an amendment to the housing target, which will result in the annual target being reduced from 867 to 790 dwellings. Rather than repeat our comments under each reference number separately, we would kindly request that our concerns set out under PM3 are noted in respect of each of the following Proposed Modifications:

- PM4 Policy SS1: Delivering Sustainable Growth for York – Policy
- PM5 Policy SS1: Delivering Sustainable Growth for York – Explanation
- PM20a Policy H1: Housing Allocations
- PM21 Policy H1: Housing Allocations
- PM22 Policy H1: Housing Allocations Explanation
- PM44 Table 15.2: Delivery and Monitoring - Housing

We understand the Inspectors originally wrote to the Council in July 2018 to highlight a number of initial concerns in respect of the soundness of the Plan. One of the concerns raised related to how there was no explanation as to why the housing target quoted in the Local Plan was 10% less than the recommended figure in the Council's evidence, as set out in SHMA (2016) prepared by GL Hearn.

Since the Inspector's letter was published, instead of answering the question concerning the decision to ignore the recommendation in the 2016 SHMA, the Council has attempted to sidestep the matter by commissioning GL Hearn to prepare a Housing Needs Study (2019). As such, the original question posed by the Inspectors appears to remain unanswered, and instead, the Council is attempting to secure an amendment to the housing target based on the 2019 Update that is now the subject of this current consultation.

As far as we are aware, proposed modifications can only be recommended by the Inspectors (Planning and Compulsory Purchase Act 2004). To date, the Inspectors have not requested for the housing target to be revised nor for the housing need evidence be reviewed. Instead, the Inspectors have asked the Council to explain why their consultant's recommended housing target was ignored. An appropriate response has not been provided, and instead the matter has been sidestepped. As a result, it appears an attempt is being made to change the nature of discussions rather than deal with the situation head on.

We are unclear why the Council felt compelled to commission the 2019 Update, or submit new evidence to the Examination, especially at such a late stage in the process. We also do not

understand why the Inspector's original questions in relation to the objectively assessed need remain outstanding. We believe a straight response is still needed as the Inspectors are required to consider the Plan as submitted. The changes now proposed should not be considered as an alternative to the content of the submitted Plan or the evidence used to inform the drafting of the Plan. Instead, the proposed modifications should be considered alongside the submitted Plan.

It is always the case that circumstances can change between the submission of a Plan and receipt of an Inspector's report, which is why Examinations are intended to examine Plans as submitted. If the process required every policy change or statistic update to be taken into consideration then no Plan would ever be adopted. There is, therefore, no requirement for the Council to update the objective assessment of need. Especially as the evidence submitted alongside the Plan was not out of date. The SHMA was only published in 2016 and the Plan was then submitted in 2018. As such, it complied with the Procedure Guide for Local Plan Examinations (June 2019), which explains evidence should be no more than a couple of years old. In a letter to the Inspector's the Council attempts to justify why an Update has been commissioned, but we do not believe the case put forward is justified. Even if the Government has released a Standard Methodology, there is no requirement for the Plan to take account of it. Especially as the Standard Methodology forms part of the revised version to the NPPF (2019), but the Local Plan is to be considered in light of the 2012 version of the NPPF, which makes no reference to the Standard Methodology. It therefore appears the Council is attempting to introduce matters that are not relevant to the consideration of this Local Plan Examination, especially as the NPPF 2012 expects housing targets to be based on objectively assessed need.

The update appears to be based on using the 2016 based SNPP rather than the 2014 based SNPP. Not only is the base data on which the assessment has been made different, but the assumptions on how to interpret the data have also been updated. As such, attempting to compare the 2019 assessment with the 2017 assessment is like comparing apples with pears.

Furthermore, many of the Council's criticisms of the 2016 SHMA have not been addressed in the latest 2019 Update. For example, the Council raised concerns that the 2016 SHMA to be "...speculative and arbitrary, rely too heavily on recent short-term unrepresentative trends..." yet the latest 2019 Update makes clear how some of the 2016 based SNPP data on which the assessment has been based is derived from much shorter time periods than the previous 2014 based SNPP. This is evident under paragraph 2.20 where it is mentioned how the household formation rates that underpin the 2014 data go back to 1971, but the 2016 data only goes back to 2001. Consequently, the 2019 Update does nothing to address the shortcomings of the previous 2016 SHMA, and certainly does not provide a more reliable evidence base. Instead, it highlights how important it is to include margins and buffers within target figures in order to create an appropriate amount of flexibility. As such, the new evidence simply opens a whole new conversation about statistics that is not an appropriate discussion to be conducting at such a late stage in the process.

Clearly, the housing target set out in the submitted Plan is unsound, because it ignored the evidence, which included the reasons why a 10% buffer needed to be added. The Council has provided no explanation to date as to why they decided to ignore the advice of their consultants, and why it was appropriate to artificially reduce the housing target. As such, the submitted Plan is unsound, because the housing target was not based on the objectively assessed need identified within the evidence. In

addition, there has been no justification as to why the target in the Plan has not been based on the evidence. In turn, this means the Plan cannot be effective because it fails to identify an appropriate housing target, and the Plan is not consistent with national policy because it ignores guidance on how to prepare plans.

One aspect that appears to be missing from the latest consultation is an assessment of the impact of changing the housing target on neighbouring authorities. There appears to be no assessment of the impact in relation to the Duty to Cooperate. Reducing the housing target for York has to have an impact on neighbouring authorities and their ability to meet their own housing need, and also on their economies. For this reason, we do not believe the Plan is legally compliant.

Test of Soundness

In order to make the Plan sound, we believe the proposed modification to reduce the housing target from 867 to 790 dwellings per annum should be ignored. Instead, the original evidence within the SHMA 2016 should be relied upon given it is based on data that is established from trends taken from a longer period than found in the 2019 Update. The Council should then be asked to answer the original question in order to either justify the target of 867 or else accept the higher figure proposed by GL Hearn in the 2016 SHMA. In doing so, the legal issue with regards to the Duty to Cooperate should not arise.

PM25 Policy D4: Conservation Areas

This proposed modification is intended to clarify how the policy is expected to apply to all types of planning application, and not just outline applications. However, we believe this modification misses the point of why the policy was originally worded in the manner it appears in the submitted version of the Plan.

Typically, local planning authorities do not accept outline planning applications within conservation areas because it is not possible to assess the impact of a proposal without full design details. As such, it is usual that only full applications can be submitted within conservation areas, and outline applications are usually always rejected. The original policy was therefore intended to make clear the explicit support for the submission of outline applications where detailed design information is included as part of the application pack.

The proposed modification has now changed the essence of the policy, as it no longer is explicit in regards to how outline planning applications will be accepted within conservation areas where full design details are submitted in support. We therefore believe the proposed modification is unhelpful as the meaning of the policy has been altered so the original objective of the policy no longer exists. The Policy is, therefore, no longer effective.

Test of Soundness

Consequently, we would kindly ask that the modification is rejected in favour of retaining the original wording for the Plan to be considered sound.

Addendum to Topic Paper 1: The Approach to Defining York's Green Belt

We are extremely concerned with the Council's approach to introducing modifications to Green Belt boundaries at such a late stage in the process, and also the nature of the Addendum.

The proposed modifications to the boundaries that appear within the consultation documents are based on evidence set out in an Addendum to the City of York Local Plan Topic Approach to Defining York's Green Belt (2018) that has been prepared in response to initial concerns raised by the Inspectors in regards to how the Council has approached Green Belt policy. Paragraph 1.2 of the 2019 Paper makes clear how the Addendum is intended to set out specifically "the methodology and evidence for the setting of inner and outer Green Belt boundaries; the exceptional circumstances test for the removal of land from the Green Belt; the approach to Urban Areas within the Green Belt; and the allocation of strategic sites within the general extent of the Green Belt." Additionally, paragraph 2.4 sets out how "This addendum explains how and where detailed inner and outer Green Belt Boundaries have been defined through the Local Plan."

Our understanding of the meaning of an 'Addendum' is that it is usually an item to be added to a document to correct an error or for clarification, but in this instance the addendum extends to 89 pages with six appendices attached. For an addendum, it is rather hefty. Additionally, many of the matters raised represent wholly new evidence rather than corrections or points of clarity. As such the Addendum raises new evidence at an extremely late stage in the process that is fundamental to the Council's ability to make decisions concerning Green Belt boundaries. Quite simply, the modifications being proposed to the boundaries should not need to be introduced at such a late stage in the process, as the work should have been completed before the Plan was finalised and submitted for Examination.

By attempting to fill gaps within the evidence base, rather than simply provide greater clarity to matters previously covered in the Green Belt Topic Paper published in 2018, it appears the Council is attempting to retrospectively justify decisions previously made. Additionally, the Council is setting out evidence that should have been collated, analysed and consulted upon before such an advanced stage in the process. The NPPF (2012) makes clear under paragraph 158 how local plans should be based on adequate, relevant and up to date evidence. In addition, paragraph 152 explains how local plans should be justified whereby reasonable alternatives have been taken into account and on the basis of proportionate evidence. We therefore believe the evidence now presented through the Addendum is pertinent to decisions that were made at previous stages of the Plan process. Given that the Addendum has only just been produced then the Plan, as submitted, cannot be considered to have been drafted on the necessary evidence required for the Plan to be effective or justified. The implications of the Addendum are significant, especially as Green Belt policy is of national significance, so we are most concerned at the Council's less than attentive approach to date.

We are also concerned that the current consultation does not provide an opportunity to comment on the Council's approach in general to defining Green Belt boundaries. For example, the methodology adopted as the basis for the assessment of sites set out in Appendix 5 is wholly new. As part of this consultation, the Addendum only assesses the allocations found in the submitted local plan where the site sits within the general extent of the Green Belt, or else the inner and outer boundary. There is no general assessment as to whether any other land fails to fulfil the purposes of Green Belt policy, and should be actively excluded, such as the land identified at earlier stages of the process for safeguarding.

Consequently, the Council's Green Belt assessment still falls short of what might be expected of a comprehensive assessment through which detailed boundaries are to be set for the first time. Especially, as the Addendum fails to explain how the Council did intend to safeguard land for development at an earlier stage of the process, but then decided against the idea in favour of allocating land for development for a period of five years beyond the end of the Plan period. The effect of which is that the Plan pre-determines the strategy of the next Local Plan, and allocates in excess of 4000 more homes than is necessary to meet the identified housing target, as set out in the submitted version of the Plan. As such, the current consultation on the Addendum raises fundamental questions concerning the Plan in general. However, we understand from the Inspector's letters and the introduction to the consultation documents how the current consultation is only intended to provide an opportunity for comment on the new evidence and the proposed modifications, rather than the Plan in general. We are therefore highly concerned that the current consultation has made the whole process unsound, because the implications of the new evidence extend much wider than simply the proposed modifications. The latest evidence is fundamental to justifying the Plan, but the timing of the Addendum and other evidence means that this important evidence did not inform the drafting of the Plan. The NPPF and the various Acts make clear that Plans should be underpinned by relevant and up to date evidence (para 158, NPPF, 2012) yet the evidence has been prepared after the submission of the Plan. As such, the Plan can only be considered to be unsound, because its drafting has not been based on the evidence. Instead, the evidence is being used to retrospectively justify the Plan.

We understand from reading correspondence from the Inspectors to the Council how concern has been expressed with regards to the lack of clear evidence to explain how the Council has defined boundaries, or to justify the release of land within the general extent of the Green Belt for development. We do, however, believe there is a more fundamental issue with the Council's approach to Green Belt, which is how the Plan fails to address the matter of permanence in respect of Green Belt boundaries. It is known that the Council has received a Barrister's opinion, which makes clear how the Plan cannot be considered to be sound without safeguarding land in order to ensure the Green Belt boundaries will endure. Yet the Council has ignored the advice in favour of allocating land in excess of what is reasonably required to deliver housing need within the Plan period. The intention of allocating the additional land appears to be in order to provide a supply of land for development beyond the Plan period. It is expected the additional land might last five years beyond the Plan period, but we do not believe a supply of land for five years is sufficient given boundaries are expected to endure for at least ten years.

Also, the annual target is not yet known beyond the end of the Plan period, so there is no certainty that the allocations would last five years. Consequently, we believe the approach is unsound because it is contrary to the NPPF, which sets out how local authorities should determine a strategy for the defined period of time and allocate land to help deliver the strategy. In addition, the NPPF makes clear how boundaries should be permanent and endure. The current approach adopted by the Council is clearly not consistent with national policy.

Test of Soundness

We understand how we are expected to explain what changes should be made to the Plan in order for it to be found sound. In respect of the Council introducing evidence at such a late stage in the process, we believe the Plan should be withdrawn in order for Regulation 19 consultation to be

undertaken again. The purpose being is to provide an opportunity for comments to be made in respect of the implications of the drafting of the Plan in general in light of the new evidence.

For the Plan to be found sound, we also believe the Council needs to safeguard land, in order to comply with paragraph 85 of the NPPF (2012) to ensure the Green Belt boundaries will endure beyond the end of the Plan period, and can be considered to be permanent.

From: localplan@york.gov.uk
Sent: 22 July 2019 18:02
To: localplan@york.gov.uk
Subject: FW: Response to CYC Local Plan Proposed Modifications Consultation OBO W Birch
Attachments: W Birch Proposed Mods Response 220719.pdf; W Birch Proposed Mods Response Form 220719.pdf

Follow Up Flag: Follow up
Flag Status: Completed

From: Kathryn Jukes [REDACTED]
Sent: 22 July 2019 14:11
To: localplan@york.gov.uk
Subject: Response to CYC Local Plan Proposed Modifications Consultation

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good afternoon

Please find attached our response to the current consultation on the City of York Local Plan Proposed Modifications.

We look forward to receiving confirmation of receipt in due course.

Kind regards
Kathryn

Kathryn Jukes BA (Hons) DipTP MRTPI
Director
Directions Planning Consultancy Ltd

[REDACTED]
[REDACTED]
[REDACTED]
Web: www.directionsplanning.co.uk



 Before printing, think about the environment

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City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Ms
First Name		Kathryn
Last Name		Jukes
Organisation (where relevant)		Directions Planning Consultancy Ltd
Representing (if applicable)		W Birch & Sons Ltd
Address – line 1		██████████
Address – line 2		██████████
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		██████████
E-mail Address		██
Telephone Number		██

Representations must be received by Monday 22 July 2019, up until midnight.

Representations received after this time will not be considered duly made.

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B -Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

Please see attached letter

Document:

Please see attached letter

Page Number:

Please see attached letter

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes

No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared **Justified**

Effective **Consistent with national policy**

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

Please see attached letter

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

Please see attached letter

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To take part in discussions in order to make clear our concerns.

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 2018 to inform the Local Plan process. We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't. City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

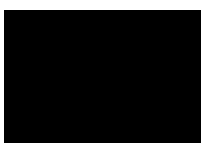
Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

Signature



Date 22/07/19

**RESPONSE TO THE PROPOSED MODIFICATIONS
CONSULTATION**

CITY OF YORK LOCAL PLAN

**PREPARED ON BEHALF OF
WILLIAM BIRCH & SONS LTD**



Prepared By:
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23 Victoria Avenue
Harrogate
HG1 5RD



22 July 2019

INTRODUCTION

Directions Planning Consultancy has been instructed in behalf of William Birch and Sons to review the Proposed Modifications and new evidence, and respond to the latest consultation on the draft City of York Local Plan.

COMMENTS ON THE PROPOSED MODIFICATIONS

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This proposed modification is intended to clarify how the policy is expected to apply to all types of planning application, and not just outline applications. However, we believe this modification misses the point of why the policy was originally worded in the manner it appears in the submitted version of the Plan.

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The proposed modification has now changed the essence of the policy, as it no longer is explicit in regards to how outline planning applications will be accepted within conservation areas where full design details are submitted in support. We therefore believe the proposed modification is unhelpful as the meaning of the policy has been altered so the original objective of the policy no longer exists. The Policy is, therefore, no longer effective.

Test of Soundness

Consequently, we would kindly ask that the modification is rejected in favour of retaining the original wording for the Plan to be considered sound.

PM40 Green Belt change to Elvington Industrial Estate, Elvington

PM40 introduces a change to the Proposal Map whereby additional land is to be excluded from the Green Belt and included within the development limits around Elvington Industrial Estate. The change is proposed to reflect circumstances found on the ground, and how the land does not contribute to the openness of the countryside.

Test of Soundness

The proposed modification is effective and justified, and so it is welcomed by my client, who is the landowner of the Industrial Estate.

Addendum to Topic Paper 1: The Approach to Defining York's Green Belt

Despite our support of PM40, we are extremely concerned with the Council's approach to introducing modifications to Green Belt boundaries at such a late stage in the process, and also the nature of the Addendum.

The proposed modifications to the boundaries that appear within the consultation documents are based on evidence set out in an Addendum to the City of York Local Plan Topic Approach to Defining York's Green Belt (2018) that has been prepared in response to initial concerns raised by the Inspectors in regards to how the Council has approached Green Belt policy. Paragraph 1.2 of the 2019 Paper makes clear how the Addendum is intended to set out specifically "the methodology and evidence for the setting of inner and outer Green Belt boundaries; the exceptional circumstances test for the removal of land from the Green Belt; the approach to Urban Areas within the Green Belt; and the allocation of strategic sites within the general extent of the Green Belt." Additionally, paragraph 2.4 sets out how "This addendum explains how and where detailed inner and outer Green Belt Boundaries have been defined through the Local Plan."

Our understanding of the meaning of an 'Addendum' is that it is usually an item to be added to a document to correct an error or for clarification, but in this instance the addendum extends to 89 pages with six appendices attached. For an addendum, it is rather hefty. Additionally, many of the matters raised represent wholly new evidence rather than corrections or points of clarity. As such the Addendum raises new evidence at an extremely late stage in the process that is fundamental to the Council's ability to make decisions concerning Green Belt boundaries. Quite simply, the modifications being proposed to the boundaries should not need to be introduced at such a late stage in the process, as the work should have been completed before the Plan was finalised and submitted for Examination.

By attempting to fill gaps within the evidence base, rather than simply provide greater clarity to matters previously covered in the Green Belt Topic Paper published in 2018, it appears the Council is attempting to retrospectively justify decisions previously made. Additionally, the Council is setting out evidence that should have been collated, analysed and consulted upon before such an advanced stage in the process. The NPPF (2012) makes clear under paragraph 158 how local plans should be based on adequate, relevant and up to date evidence. In addition, paragraph 152 explains how local plans should be justified whereby reasonable alternatives have been taken into account and on the basis of proportionate evidence. We therefore believe the evidence now presented through the Addendum is pertinent to decisions that were made at previous stages of the Plan process. Given that the Addendum has only just been produced then the Plan, as submitted, cannot be considered to have been drafted on the necessary evidence required for the Plan to be effective or justified. The implications of the Addendum are significant, especially as Green Belt policy is of national significance, so we are most concerned at the Council's less than attentive approach to date.

We are also concerned that the current consultation does not provide an opportunity to comment on the Council's approach in general to defining Green Belt boundaries. For example, the methodology adopted as the basis for the assessment of sites set out in Appendix 5 is wholly new. As part of this consultation, the Addendum only assesses the allocations found in the submitted local plan where the site sits within the general extent of the Green Belt, or else the inner and outer boundary. There is no general assessment as to whether any other land fails to fulfil the purposes of Green Belt policy,

and should be actively excluded, such as the land identified at earlier stages of the process for safeguarding.

Consequently, the Council's Green Belt assessment still falls short of what might be expected of a comprehensive assessment through which detailed boundaries are to be set for the first time. Especially, as the Addendum fails to explain how the Council did intend to safeguard land for development at an earlier stage of the process, but then decided against the idea in favour of allocating land for development for a period of five years beyond the end of the Plan period. The effect of which is that the Plan pre-determines the strategy of the next Local Plan, and allocates in excess of 4000 more homes than is necessary to meet the identified housing target, as set out in the submitted version of the Plan. As such, the current consultation on the Addendum raises fundamental questions concerning the Plan in general. However, we understand from the Inspector's letters and the introduction to the consultation documents how the current consultation is only intended to provide an opportunity for comment on the new evidence and the proposed modifications, rather than the Plan in general. We are therefore highly concerned that the current consultation has made the whole process unsound, because the implications of the new evidence extend much wider than simply the proposed modifications. The latest evidence is fundamental to justifying the Plan, but the timing of the Addendum and other evidence means that this important evidence did not inform the drafting of the Plan. The NPPF and the various Acts make clear that Plans should be underpinned by relevant and up to date evidence (para 158, NPPF, 2012) yet the evidence has been prepared after the submission of the Plan. As such, the Plan can only be considered to be unsound, because its drafting has not been based on the evidence. Instead, the evidence is being used to retrospectively justify the Plan.

We understand from reading correspondence from the Inspectors to the Council how concern has been expressed with regards to the lack of clear evidence to explain how the Council has defined boundaries, or to justify the release of land within the general extent of the Green Belt for development. We do, however, believe there is a more fundamental issue with the Council's approach to Green Belt, which is how the Plan fails to address the matter of permanence in respect of Green Belt boundaries. It is known that the Council has received a Barrister's opinion, which makes clear how the Plan cannot be considered to be sound without safeguarding land in order to ensure the Green Belt boundaries will endure. Yet the Council has ignored the advice in favour of allocating land in excess of what is reasonably required to deliver housing need within the Plan period. The intention of allocating the additional land appears to be in order to provide a supply of land for development beyond the Plan period. It is expected the additional land might last five years beyond the Plan period, but we do not believe a supply of land for five years is sufficient given boundaries are expected to endure for at least ten years.

Also, the annual target is not yet known beyond the end of the Plan period, so there is no certainty that the allocations would last five years. Consequently, we believe the approach is unsound because it is contrary to the NPPF, which sets out how local authorities should determine a strategy for the defined period of time and allocate land to help deliver the strategy. In addition, the NPPF makes clear how boundaries should be permanent and endure. The current approach adopted by the Council is clearly not consistent with national policy.

Test of Soundness

We understand how we are expected to explain what changes should be made to the Plan in order for it to be found sound. In respect of the Council introducing evidence at such a late stage in the process, we believe the Plan should be withdrawn in order for Regulation 19 consultation to be undertaken again. The purpose being is to provide an opportunity for comments to be made in respect of the implications of the drafting of the Plan in general in light of the new evidence.

For the Plan to be found sound, we also believe the Council needs to safeguard land, in order to comply with paragraph 85 of the NPPF (2012) to ensure the Green Belt boundaries will endure beyond the end of the Plan period, and can be considered to be permanent.

From: planningconsultation@coal.gov.uk
Sent: 22 July 2019 09:41
To: localplan@york.gov.uk
Subject: (5) City of York Local Plan: Proposed Modifications Regulation 19 Consultation
Attachments: Consultation-Response-PPO-008-450-086.docx

Follow Up Flag: Follow up
Flag Status: Completed

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Forward Planning

Following the policy consultation on 10 June 2019, please find attached our comments

relating to the above policy.

If you would like to discuss any of the issues raised, please contact us.

Regards

Planning and Local Authority Liaison team

T: 01623 637119

E: planningconsultation@coal.gov.uk

W: <https://www.gov.uk/coalauthority>

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The Coal
Authority

City of York Local Plan: Proposed Modifications

Contact Details

Planning and Local Authority Liaison Department
The Coal Authority
200 Lichfield Lane
Berry Hill
MANSFIELD
Nottinghamshire
NG18 4RG

Planning Email: planningconsultation@coal.gov.uk
Planning Enquiries: 01623 637 119

Date

22 July 2019

City of York Local Plan: Proposed Modifications Consultation

Thank you for your notification received on the 10 June 2019 in respect of the above consultation.

I can confirm that the Coal Authority has no specific comments to make in respect of the Main Modifications proposed.

Regards



Melanie Lindsley BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI
Development Team Leader (Planning)

From: Eamonn Keogh [REDACTED]
Sent: 22 July 2019 19:31
To: localplan@york.gov.uk
Subject: Proposed Modifications - Representations on behalf of Galtres Garden Village Development Company
Attachments: 190722 Galtres Reprs Mods ful doc SUBMIT.pdf;
Local_Plan_Proposed_Mods_Response_Form_2019 Galtres.pdf
Follow Up Flag: Follow up
Flag Status: Completed

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sirs,

Please find attached a representation on the Draft Local Plan Proposed Modifications on behalf of the Galtres Garden Village Development Company.

If you have any queries please get back to me.

Kind regards

Eamonn

 **O'Neill**
ASSOCIATES
Chartered Town Planning Consultants

Eamonn Keogh
[REDACTED]
www.oneill-associates.co.uk

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City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details		2. Agent's Details (if applicable)
Title		Mr
First Name		Eamonn
Last Name		Keogh
Organisation (where relevant)	Galtres Garden Village Development Company	O'Neill Associates
Representing (if applicable)		Galtres Garden Village Development Company
Address – line 1	C/O Agent	Lancaster House
Address – line 2		James Nicolson Link
Address – line 3		Clifton Moor
Address – line 4		York
Address – line 5		
Postcode		YO30 4GR
E-mail Address		████████████████████
Telephone Number		01904 692313

Representations must be received by Monday 22 July 2019, up until midnight.

Representations received after this time will not be considered duly made.

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B -Your Representation

(Please use a separate Part B form for each issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

PM2; PM3, PM4, PM5, PM 13; PM14; PM18;
PM19; PM20a to 20d, PM21a to PM21d; PM22

Document:

Proposed Modifications Document

Page Number:

8, 9, 10, 12, 17, 23, 24

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

We are not aware of any updated information that answers the points below that were made in our 2018 representations:

With regard to the duty to co-operate it may be the case the Council has consulted with neighboring authorities, but some of those authorities have expressed concerns that have not been fully resolved. Annex B to Agenda item 11 on the report of the Local Plan to the Council's Executive on the 25th January reported:

Hambleton Council: "...It [the Draft Plan] does not safeguard land for development and recognises the build out time of the Strategic sites will extend beyond the plan period. The proposed detailed boundaries of the Green Belt offer little opportunity to accommodate the increased level of growth proposed. If the City of York does not ensure that its longer-term development needs are met this will place pressure on area in neighbouring authorities"

Leeds city region LEP: "York has not applied the 10% market signals adjustment as recommended in the York 2017 Strategic Housing Market Assessment".

Ryedale Council: Discussions ongoing

Harrogate Council: Discussion ongoing

Selby District Council: *“Having read the SHMA Addendum, it is noted that this figure does not take into account the level of employment growth proposed by the Local Plan.....Whilst you are confident that you can realise the growth aspirations detailed within the Pre-Publication Local Plan within the City of York Boundary, Selby District Council is concerned that any increases to this figure could raise significant cross-boundary issues”.*

Selby Council requested additional information on Strategic site ST15 and the university site ST27 before providing any further comments on the potential impact these allocations may have on Selby.

What these comments demonstrate is that whilst the Council may have engaged in a process of dialogue with neighbouring authorities, it has not produced outcomes that have addressed some significant concerns of neighbouring authorities. Indeed, at this stage the views of some adjoining Authorities are not known and it is difficult to see how, in these circumstances, the Duty to Co-Operate has been complied with.

What does ‘Sound’ mean?

Soundness may be considered in this context within its ordinary meaning of ‘fit for purpose’ and ‘showing good judgement’. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework’s four ‘tests of soundness’ listed below.

What makes a Local Plan “sound”?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

See attached representation document Ref: 190722.gvdc.lpreps

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.

You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

Proposed changes are included in the representation document included with this representation

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

There are significant matters relating to the Housing requirement and proposed allocations that we wish to explore in more detail with the Inspector. We believe we can make a positive and constructive contribution to the discussion

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 2018 to inform the Local Plan process. We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't. City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

Signature

Date

CITY OF YORK LOCAL PLAN

PROPOSED MODIFICATIONS JUNE 2019

GALTRES GARDEN VILLAGE
(LAND NORTH EAST OF HUNTINGTON)

SUBMISSION ON BEHALF OF:

Galtres Garden Village Development Company

REPRESENTATIONS IN SUPPORT OF
AN ALLOCATION FOR A NEW SETTLEMENT

July 2019



Chartered Town Planning Consultants

EXECUTIVE SUMMARY

- i. The Galtres Garden Village promoters wish to create a new settlement for York which echoes the “garden village” ethos of New Earswick and Derwenthorpe, with housing set in well landscaped surroundings with local facilities as part of a low-carbon development. The Garden Village proposed in these representations will deliver that vision - a high quality, sustainable residential environment that will provide 40% of its dwellings as affordable housing.
- ii. Representations have been made on the Further Sites Consultation document in 2016 and on the Pre-Publication stage of the Local Plan in October 2017. The representations were reported to the Local Plan Working Group on January 23rd 2018. Although there were some minor residual concerns, the officer conclusion was that the site could **now be considered as a potential new housing allocation**.
- iii. Representations were subsequently submitted in April 2018 on the Regulation 19 Publication Draft Local Plan updating the case for the allocation of the site. This representation addresses the proposed modifications to the Draft Local Plan and the additional evidence presented to justify the proposed Green Belt boundaries.
- iv. Our review of the Proposed Modifications reinforces our representation made in 2018 that:
 - The proposed reduction in the housing requirement figure is not justified and that the Draft Local Plan housing allocations are inadequate to meet anticipated housing needs:
 - The Council has wrongly interpreted National Planning Policy when defining Green Belt Boundaries. Green Belt boundaries are not defensible because insufficient land has been excluded from the Green Belt to meet development needs during and beyond the 16-year Plan period.
 - The duty to co-operate has not been complied with because neighbouring planning authorities have not had the opportunity to comment on the

proposed reduced housing provision for the York Council area and our previous concerns outlined in the our 2018 representations have not been addressed.

- v. The scale of the deficit in housing land supply is significant as explained in the body of our representations. The table below summarises our conclusions on housing land supply.

	Estimate based on Council's requirement of 790 dpa	Galtres Village Development Company Estimate based on 1,070 dpa
Housing Requirement 2017 to 2033	7,945	17,097
5-year land supply including Local Plan allocations	6.39	3.01

- vi. The Galtres Village scheme will address these shortcomings. It proposes a new settlement of 1,753 units of which 1,403 will be market and affordable dwellings, 286 retirement dwellings in a mixture of houses, bungalows and extra care apartments and a 64-bed care home. At least 40% of the dwellings will be affordable units. The development area comprises 77.37 hectares with an additional 15.6 hectares available for a country park (See Promotion brochure at Appendix 1).
- vii. In keeping with the Garden Village ethos, the new settlement will be set within a landscaped environment that will include generous planting around the boundaries of the settlement and large areas of open space through its core.
- viii. The Galtres Development Company will deliver affordable housing in conjunction with Home Housing (a leading social housing provider) in an innovative way that will provide significant benefits for the City. The development company proposes to deliver major tranches of affordable housing in the early years of the scheme. The scheme will also facilitate an element of self and custom build housing. In addition the developers are open to working with the Councils housing development company.

- ix. Our objective is to provide affordable housing at a cost that makes early and significant delivery of units feasible.
- x. The proposed vehicular accesses off North Lane to the site can be delivered in such a way that the highway network is not compromised. The scheme will be designed to provide easy access for public transport early in the scheme development.
- xi. Community facilities such as a primary school, retail and other outlets will provide a significant benefit to the residents of the development and to the local population who will access the site. Generous provision of public open space, including a sports field, will also increase the benefit to the locality.
- xii. The Galtres Development Company has involved Oakes Energy Services Limited to help deliver low and zero carbon energy solution for the scheme.
- xiii. An independent survey of York residents shows a significant level of support for the Galtres site. A full copy of the survey is included at Appendix 2.
- xiv. The land is available, the development is achievable, and the scheme can deliver 1,753 residential units in a range of affordable and market housing and retirement units that will make a significant contribution to addressing the three major housing issues facing the City of York for the foreseeable future.
- xv. Without additional major sustainable housing allocations such as Galtres Village these requirements will continue to go unmet and the housing needs of the people of York and their children will not be served.

CONTENTS

- 1.0 INTRODUCTION
- 2.0 OBJECTION TO PROPOSED MODIFICATIONS PM3, PM4, PM5, PM20A TO 20D,
PM21A TO 21D AND PM 22
- 3.0 GREEN BELT
- 4.0 SUSTAINABILITY APPRAISAL
- 5.0 CONCLUSIONS

APPENDICES

- 1 Galtres Garden Village Prospectus
- 2 Public Opinion Survey
- 3 Extract from 23 January 2018 Local Plan Working Group Report
- 4 Schedule of outstanding commitments
- 5 Allocated sites development trajectory

REF: I90722.gvdc.lpreps

1.0 INTRODUCTION

- 1.1 This submission is made in support of a potential housing allocation of land to the north east of Huntington in response to the Proposed Modifications to the Draft Local Plan June 2019 (**the Draft Plan**). The detail justification for the allocation of the Galtres Garden village site is set out in our representations made on the Publication Draft Plan in April 2018. Our case remains unchanged other than where updated by these representations.
- 1.2 In drafting our representations on the proposed modifications, we are mindful that the Draft Plan is being examined under the transitional arrangements and the relevant National Planning Policy is the NPPF March 2012.
- 1.3 Table 1 below set out our response to the proposed modifications and indicates, where appropriate, additional commentary to our response can be found.

Table 1 - Summary of our response on the Proposed Modifications

Proposed Modification	Response	Comment
PM2 Removal of deleted Policies from the Plan	We agree with the proposed modification	Updated evidence prepared by the Council supports the proposed modification
PM3 Explanation of City of York Housing Needs	We object to the proposed modification	Our objection is elaborated in section 2 of this representation
PM4 Policy SSI: Delivering Sustainable Growth for York	We object to the proposed modification	Our objection is elaborated in section 2 of this representation
PM5 - Policy SSI: Delivering Sustainable Growth for York	We object to the proposed modification	Our objection is elaborated in section 2 of this representation

<p>PM13 - Policy SS19: Queen Elizabeth Barracks, Strensall</p>	<p>We agree with the proposed modification</p>	<p>Updated evidence prepared by the Council supports the proposed modification</p>
<p>PM14 - Policy SS19: Queen Elizabeth Barracks, Strensall</p>	<p>We agree with the proposed modification</p>	<p>Updated evidence prepared by the Council supports the proposed modification</p>
<p>PM18 - Policy H1: Housing Allocations(H59)</p>	<p>We agree with the proposed modification</p>	<p>Updated evidence prepared by the Council supports the proposed modification</p>
<p>PM19 - Policy H1: Housing Allocations (ST35)</p>	<p>We agree with the proposed modification</p>	<p>Updated evidence prepared by the Council supports the proposed modification</p>
<p>PM20a to PM20d - Policy H1: Housing Allocations</p>	<p>We object to the proposed modification</p>	<p>The allocations are inadequate to meet the housing needs of the City. Our objection is elaborated in section 2 and 3 of this representation</p>
<p>PM21a to PM21d - Policy H1: Housing Allocations</p>	<p>We object to the proposed modification</p>	<p>The allocations are inadequate to meet the housing needs of the City. Our objection is elaborated in section 2 and 3 of this representation</p>
<p>PM22 - Policy H1: Housing Allocations Explanation</p>	<p>We object to the proposed modification</p>	<p>The allocations are inadequate to meet the housing needs of the City. Our objection is elaborated in section 2 and 3 of this representation</p>

2.0 OBJECTION TO PROPOSED MODIFICATIONS PM3, PM4, PM5, PM20a to 20d, PM21a to 21d AND PM 22

The Plan Period

- 2.1 The Submission Draft Plan proposes a 16-year plan period starting at 1st April 2017 and extending to 31st March 2033. Beyond 2033 the plan has made provision for development needs for an additional 5 years to ensure a “permanent” Green Belt Boundary. We will deal with issue of permanence later in this representation.
- 2.2 On the issue of the plan period, there is an immediate and obvious issue. Two years have elapsed since the start of the plan period and in the absence of an adopted plan, there has been little if any development activity on any of the strategic and large housing sites.
- 2.3 Optimistically, the plan will not be adopted until mid or late 2020. Realistically, probably not until early to mid-2021. At that point, 4 years of the plan period will have elapsed with no housing development of any significance on the strategic sites, leaving only 12 years of the period remaining.
- 2.4 To meet the housing needs of the City the plan period should be moved forward so that the development needs fo the City can be properly accommodated. For the purpose of these representations and particularly for the purpose of calculating the housing requirement, we assume that the plan period will remain as 16 years but with a start date of April 2019.

The imperative for additional housing allocations – policy context

- 2.5 The primary policy context for considering the proposed modifications is the National Planning Policy Framework and associated National Planning Practice Guidance. As the Plan is being prepared under the transitional arrangements set out in paragraph 214 of Annex 1 of the 2019 NPPF, the NPPF March 2012 is the primary document but where appropriate cross reference will be made to the updated NPPF February 2019.

2.6 The NPPF was published in March 2012 and replaced all previous Planning Policy Guidance notes and some circulars. The Framework sets out the Government's clear intention to facilitate economic growth through sustainable development. In the introduction to the framework, the Minister for State says:

The purpose of planning is to help achieve sustainable development.

Sustainable means ensuring that better lives for ourselves don't mean worse lives for future generations.

Development means growth. We must accommodate the new ways by which we will earn our living in a competitive world. We must house a rising population, which is living longer and wants to make new choices.....

2.7 At the heart of the NPPF is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking. The NPPF explains that for plan making taking this means:

- *local planning authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole;*
 - or*
 - *specific policies in this Framework indicate development should be restricted*

2.8 On the issue of housing the NPPF is clear about the need for a significant increase in housebuilding to address existing backlog and meet future needs. Local authorities are encouraged to "...**boost significantly**..." the supply of housing. Paragraph 47 of the NPPF states:

To boost significantly the supply of housing, local planning authorities should:

- *use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area*

- *identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;.....*

2.9 This advice is echoed Section 5 of the NPPF 2019

2.10 With regard to affordable housing, paragraph 50 of the NPPF advises that where LPA's have identified that affordable housing is needed, they should, preferably, set policies for meeting this need on site.

2.11 However, in setting the requirement for affordable housing, regard must be had to the viability of development. Paragraph 173 advises that plan making requires careful attention to viability:

Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.

2.12 Paragraph 174 goes on to say that the cumulative cost of policy and local standards imposed on development, including affordable housing.

...should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle."

THE IMPERATIVE FOR ADDITIONAL HOUSING ALLOCATIONS – HOUSING NEED

2.13 In order to address the complex context for the assessment of the housing need for the City this section is set out in 4 stages:

- **Stage 1** summaries the political decisions taken at the Local Plan Working Group that decided the final content of the Publication Draft Plan and latterly the proposed modifications;
- **Stage 2** sets out our assessment of the Housing Requirement;
- **Stage 3** includes our critique of the housing delivery proposed in the Local Plan;
- **Stage 4** sets out our assessment of 5-year housing land supply position as at the time of the representation;

Stage 1 – The Political Context

Local Plan Working Group July 2017

- 2.14 The report to the LPWG on the 10th July 2017 identified an annual housing requirement of 953 dwellings per annum based on evidence provided by the Council's own consultants G L Hearn in the Draft Strategic Housing Market Assessment Addendum May 2017. The 953 figure was composed of a demographic baseline of 867 dwellings; and an upward adjustment, for 'market signals', of 10%.
- 2.15 The LPWG report stated that the Plan period runs from 2012 to 2033. The Council acknowledged in the LPWG report that as York is setting detailed Green Belt Boundaries for the first time, it was also necessary to consider the period beyond the end date of the plan to 2038 to provide an enduring Green Belt.
- 2.16 On the basis of the LPWG report, the housing requirement for the Plan period 2012 to 2033 was therefore 20,013 (21 × 953). The housing requirement need calculation for the period 2033 to 2038 would be 4,765 dwellings (5 × 953).
- 2.17 In calculating the land required to meet the housing requirement for the LPWG report, the Council had regard to completions to date and unimplemented permissions. The Council also assumed a windfall completion rate of 169 dpa from year 4 of the plan 2020/21. Having regard to completions, commitments and windfalls, the Council's estimate of the remaining housing requirement for the Plan Period presented to the July 2017 LPWG is set out in Table 2:

Table 2: Council's Estimate of Housing Requirement as presented to Local Plan Working Group on 10th July 2017

Plan period 1st April 2012 to 31 st March 2033	
Total Need 2012 -2033 (based on 953 dpa per annum)	20,013
Completions 1st April 2012 to 31st March 2017	3,432
Unimplemented Permissions @ 1st April 2017	3,758*(3,578)
Windfalls (from Year 4) @ 169 pa	2,197**
Requirement Remaining	10,626 (10,806)

Source: Local Plan Working Group 10 July 2017

* We believe this to be a misprint and should be 3,578

** For period 2020 / 21 to 2332 / 33

2.18 At the Local Plan Working Group, members did not agree with the assessment of the housing requirement presented by officers. Members instead set the housing requirement at 867 dwellings per annum and that was the figure used for consultation in the Pre-Publication Draft Local Plan in September 2017.

Local Plan Working Group January 23rd 2018

2.19 The LPWG on the 23 January 2018 considered the representations made on the Pre-Publication draft plan. The Officers report presented a number of options for the housing requirement based on the degree of risk for each option. The report reminded members that they had previously been advised that the Council's independent consultants had estimated the annual housing requirement to be figure of 867 rising to 953 to allow for a 10% market signals uplift. Members had accepted the 867-baseline figure for consultation in the Pre-Consultation Draft Plan but not the figure of 953.

2.20 Members were also informed that using the draft methodology for assessing housing requirement that the Government had consulted on in late 2017, the housing requirement for the City was estimated to be 1,070 dwellings. Members were advised

that although this figure was an estimate produced by the draft methodology it nevertheless indicated the direction of travel anticipated for national policy.

- 2.21 Members were advised of their statutory duty to ensure the Submission Draft Plan meets the test of “soundness”. Officer advice was that the direction of travel in national policy indicated that if the site proposals previously consulted on were increased this would be a more robust position. Members were clearly advised that an increase in the supply of housing would place the Council in a better position to defend the Plan proposals at the Local Plan Examination process.
- 2.22 Members were also advised of the options for increasing the housing supply that were set out in four tables in the LPWG report. Those options ranged from:
- inclusion of MOD sites (table 1);
 - the enlargement of allocated strategic sites (table 2);
 - the inclusion of previously rejected sites that following further work Officers feel should be reconsidered (table 3); and
 - new sites emerging in response to the consultation on the Pre-Publication draft plan.
- 2.23 Appendix A to the LPWG report set out the Officers response to representations received on the Pre-Publication draft. The Officers assessment of the representations submitted in respect fo the Galtres site raised only minor points such that the conclusion of the officers was that this previously rejected site could now be considered as a *“Potential new housing site allocation”* (See Appendix 3 of this representation)
- 2.24 Consequently, the Galtres Garden Village site was included in the list of sites in Table3 of the LPWG report as a site that could potentially be included as a housing allocation to increase the housing provision to make the Plan more robust.

- 2.25 However, despite the advice set out in the LPWG report, Members rejected any proposal to increase the housing requirement in the Draft Plan and approved only the inclusion of the MoD sites in Table I of the report.

Council Executive 25th January 2018

- 2.26 The recommendations of the LPWG were reported to the Councils Executive on the 25th January 2018. Representatives of the promoters of the three largest strategic housing sites addressed the Executive ((Site ST 7 Land East of Metcalf Lane (845 units); Sites ST14 Land West of Wigginton Road (1,348 units); and ST15 Land West of Elvington Lane (3,339 units)). They informed members that, as proposed in the Publication Draft Local Plan, the sites were not viable or deliverable without additional land and some increase in the number of dwellings proposed for each site. The representative requested that change be made to the Draft Publication Local Plan before it went to consultation but these requests were ignored by members.

Publication Regulation 19 Consultation Draft Local Plan February 2018

- 2.27 The Publication Draft Plan proposes a 16-year plan period with a start date of 1st April 2017. This is a change from the report to the July 2017 LPWG that assumed a plan start date of 2012. This changes the basis of the calculation of the housing requirement. Completions are no longer included in this calculation as the plan start date (2017/18) is essentially year zero in this calculation. Instead the Council include an allowance for backlog (under-provision) for the period 2012 to 2017. This has implications for the Green Belt boundary discussed later in this representation.
- 2.28 The housing requirement in the Submission Draft Plan was therefore based on an annual base requirement of 867 dwellings plus an additional 56 units to account for undersupply in the period 2012 to 2017 giving a total requirement of 923 dwellings per annum
- 2.29 Taking account of these changes, the housing requirement as proposed in the Submission Draft Plan was:

**Table 3 Publication Draft Regulation 19 Consultation Plan
Housing Requirement (At Time of Publication)**

Plan period 1st April 2017 to 31 st March 2033	
Total Need 2017 -2032/33 (based on 923 dwellings per annum 867 + 56))	14,768
Unimplemented Permissions @ 1st April 2017	3,578
Windfalls (from Year 4) @ 169 pa	2,197
Requirement to be provided through allocations	8,993

2.30 In addition, to ensure what the Draft Plan considers to be enduring Green Belt Boundaries, additional land was allocated to meet the annual base requirement of 867 dwellings per annum for the 5-year period of 2033 to 2038 which effectively increased the housing requirement to be provided through housing allocations to 13,328 ((8,993+(867×5)).

2.31 Following the submission of the Local Plan, the Inspectors wrote to the Council questioning the Submission Draft housing requirement and allocations. The Inspector's letter of 24th July 2018 commented that, without prejudice to the findings of the Examination, the 2017 SHMA Update

.....appears to be a reasonably robust piece of evidence which follows both the NPPF and the national Planning Practice Guidance. The plan, however, aims to provide sufficient land for 867 dpa

2.32 The Inspectors then went on to query why the Council had settled on a figure of 867 dwellings per annum.

This [note in the front of September 2017 SHMA Update] explains that the Council accepts the figure of 867 dpa, but does not accept the conclusions of the SHMA Update concerning the uplift or the consequent OAN figure of 953 dpa. The reasons given for the latter appear to relate to the challenge of the 'step-change' in housing delivery needed. We also note that it says the Council considers GL Hearn's conclusions to be "... speculative and arbitrary, rely too heavily on recent short-term

unrepresentative trends and attach little or no weight to the special character and setting of York and other environmental constraints".

Precisely what it is about the SHMA Update that the Council considers "speculative and arbitrary" is not apparent to us. We are also unsure why you consider the SHMA Update to be "too heavily reliant on recent short-term unrepresentative trends". We therefore ask you to elaborate on these shortcomings in your evidence.

Difficulty in housing delivery and the existence of environmental constraints have no place in identifying the OAN. If such matters are to influence the plan's housing requirement, which you will appreciate is a different thing to the OAN, the case for this must be made and fully justified. At present, unless we have missed something, it is not. Overall, as things presently stand, we have significant concerns about the Council's stance regarding the OAN.

- 2.33 In response to these queries the Council commissioned another update of the OAN – Housing Needs Update January 2019. This update produced an OAN of 790 dwellings per annum based on 2016 Sub National Population Projections and 2016 based Household Projections. This is a significant reduction in OAN compared with previous estimates.
- 2.34 The Council's letter to the Inspectors dated 29 January 2019 stated that the updated OAN confirmed to the Council that the 867 dwellings per annum proposed in the submitted Plan can be shown to robustly meet requirements. There was no suggestion that the housing requirement was to be reduced to 790 dwellings per annum.
- 2.35 Table 4 below illustrates the implication for the housing requirement of the Plan period of applying the updated OAN.

**Table 4 Housing Requirement using OAN of 790 dwellings
Per annum.**

Plan period 1st April 2017 to 31 st March 2033	
Total Need 2017 -2032/33 (based on 790 dwellings per annum)	12,640
plus 32 dwellings per annum to meet backlog	512
	13,152
Unimplemented Permissions @ 1st April 2018 less 10% for non-implementation (3,345 x 0.9)	3,010
Windfalls (from Year 4) @ 169 pa	2,197
Requirement to be provided through allocations ((13,153) -3,010 + 2,197)	7,946

2.36 We consider this (Council) assessment of the requirement remaining and the housing allocations set out in the Draft Plan to be inadequate for the following reasons:

- (i) The use of 2016 population and household projections is contrary to Government Guidance
- (ii) The housing need calculation is too low;
- (iii) The calculation of completions since 2012 is too high (i.e. the Councils estimate of backlog is too low)
- (iv) Outstanding commitments include student housing that should be excluded
- (v) The assumptions on windfalls are questionable and should not be treated as a component of the Plan

Stage 2 -Assessing the Housing Requirement

(i) The 2016 Household Projections.

2.37 The January 2019 HNU advises that the OAN for the district is 790 dwellings per annum. This is a figure derived using the 2016 based SNPP, the 2016 based Household Projections and the latest mid-year estimates. We disagree with this figure for several reasons.

2.38 The Council's proposed modification to the housing requirement from 867 to 790 adds further unnecessary confusion to the housing figure debate. The modification is contradictory to the advice given by the Council in its letter of 29th January to the Inspectors which stated that the updated SHMA work has been undertaken to:

“seek to confirm that the 867 dwellings per annum proposed in the submitted Plan can be shown to robustly meet requirements”.

2.39 Fundamentally, the way the OAN has been calculated is contrary to National Planning Policy. This is confirmed by the Government in the updated Planning Practice Guidance (revised in 20th February 2019) where Paragraph 005 Ref Id. 2a-005-20190220 states that:

“The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes”.

2.40 Accordingly, whether using the “old” or “new” standardised methodology, it is clear that the Government have rejected the 2016 projections and consequently their use in the calculation of an LPA's annual housing requirement. From a practical point of view, given the unequivocal stance of the updated Planning Practice Guidance, the Government is not going to revisit and update the old guidance to make clear that the 2016 projections have been rejected.

2.41 This is particularly the case of plans being prepared under the “transitional arrangements” whereby Local Plans submitted ahead of January 2019 will be assessed on the basis of the old methodology and importantly the evidence base it relied upon

at that time. The purpose of the transitional arrangements is to avoid exactly the situation the Council have created by revisiting the OAN.

2.42 The shortcomings of the use of the 2016 population and household projections are acknowledged in the HNU:

2.20 The main change is the period from which household formation rates trends have been drawn. Previously these were based on trends going back to 1971 but in the most recent projections trends have only been taken from 2001.

2.21 It is argued that by focussing on shorter term trends ONS have effectively locked in deteriorations in affordability and subsequently household formation rates particularly within younger age groups in that time.

2.43 In addition, the HNU highlights the pressure on house prices in the City:

4.1 As shown in the figure below, the median house price in York sits at £230,000, near parity with England's median value of £235,995. The City is also more expensive than the North Yorkshire and Yorkshire and Humber equivalents of £210,000 and £157,500 respectively.

*4.2 Perhaps even more interesting to note is that lower quartile house prices in York exceed that of England by £30,000 despite having a similar overall median house price. Relatively higher values within a lower quartile housing range suggests that those **with lower incomes (such as first-time buyers) feel greater housing pressure and are less likely to be able to afford a property.** (Our emphasis)*

2.44 On the issues of affordability, the HNU is even more damning. It states:

*4.17 At the median level, York has the highest affordability ratio, and thus the least affordable housing, relative to surrounding North Yorkshire, Yorkshire and Humber, and England. In addition, the affordability ratio in York has also increased the most in the past five years relative to the other geographies – **indicating a significant worsening in affordability.....** (Our emphasis)*

4.19 The affordability statistics and the market signals reveal that as a whole, York is becoming increasingly more unaffordable and that a market signals adjustment in the City is necessitated.

2.45 The HNU reaffirms the net affordable need at 573 dwellings per annum

2.46 The Council's reliance on the 2016 population and household projections is not only contrary to Government guidance, but also flies on the face of the evidence

demonstrating the very high demand for housing in the face of diminishing supply. The evidence points overwhelmingly to strong and entrenched market signals issues across York evidenced by worsening affordability. Fundamentally the HNU promotes a low housing requirement figure that contradicts the Government's objective of significantly boosting the supply of housing particularly in areas of high housing need such as York.

(ii) Housing Need

- 2.47 In our previous representations on the Local Plan, we included an Assessment of Housing Need prepared By Nathaniel Lichfield and Partners. That Assessment established the scale of need for housing in the City of York based upon a range of housing, economic and demographic factors, trends and forecasts, based on the application of NLP's HEaDROOM framework.
- 2.48 The Assessment found that that the OAN for the City of York was in the range of between 1,125 dpa and 1,255 dpa. The approach allowed for the improvement of negatively performing market signals through the provision of additional supply, as well as helping to deliver affordable housing and support economic growth. Using this range would have ensured compliance with paragraph 47 of the Framework by significantly boosting the supply of housing. It would also have reflected paragraph 19 of the Framework, which seeks to ensure the planning system does everything it can to support sustainable development.
- 2.49 Subsequent to the Assessment prepared by NLP other Assessments have supported its findings. A review of local plan housing targets prepared By Regeneris Consulting (October 2017) in support of a planning application for up to 516 houses in Acomb (Applica Ref: 18/02687/OUTM) concluded that the demographic starting point should be 890 dwellings per annum and, with adjustment for economic growth and market signals, the final OAN was in the region of 1,150 dwellings per annum.
- 2.50 In October 2017 the Government published a consultation document on a methodology for assessing housing need that every Local Planning Authority would have to use when preparing a Local Plan. The methodology uses the projections of household growth as the demographic baseline for every local authority area. To this

is added an adjustment to take account of market signals in house prices. Along with the Consultation Paper the Government included a calculation of the housing requirement for each local authority in the country. The calculation for York was a housing requirement of 1,070 dwellings per annum. The consultation paper explains that this should be treated as the starting point for assessing the housing requirement.

2.51 These 1,070 figures is the housing requirement we adopted in our previous representations and continue to adopt in this representation.

(iii) Calculation of completions - Backlog

2.52 The Council has underestimated the scale of the backlog and their annual allowance of 32 dwellings per annum included for backlog, amounting to 512 over the 16-year plan Period, is too low. To calculate the backlog, our assessment uses the figure of 953. (This is the housing requirement figure recommended by the Council's independent consultants, G L Hearn for the period from 2012 in the report to the July 2017 LPWG.) We then subtract completions in each year for from 2012/13 to 2018/19 to obtain the backlog.

2.53 The Local Plan must demonstrate it can provide deliverable sites for the 5-year tranches within the plan period. Government guidance advises that the calculation of the 5-year supply must take account of any shortfall from previous years. How far back the shortfall should be included is a matter of judgement. There is a point at which unformed households from previous years have been permanently displaced and therefore the need to accommodate them has passed. For the purpose of this calculation, and for some degree of convenience, the period from 2012 will be used as the basis of calculating the backlog. (However, using the RSS requirement 850 dwellings per annum for the period 2008 to 2012 the backlog for that period was 1,607 dwellings which is essentially 'written off')

2.54 In order to calculate the backlog, it is necessary to analyse housing completion data contained within the Council's Annual Housing Monitoring Updates revealed that after many years of under provision, completion figures for the year 2015/16 suggested a surplus. However, the completion figure of 1,121 for 2015/16 must be treated with

some caution as it includes 579 purpose-built student accommodation units (Source: Councils Housing Monitoring Update for Monitoring Year 2015/16). Likewise, the completions figure of 2016/17 included 152 student units whilst the figures for 2017/18 include the highest number of student units ever – 637.

2.55 The Council have included the student units in their completion and commitments figures based on the definition of dwelling units used in the DCLG General Definition of Housing Terms. However, this is a mis-reading of the definition which excludes communal establishments from being counted in the **overall housing supply statistics** but adds that all student accommodation whether it consists of communal halls of residence or self-contained dwellings, on or off campus, can be included towards the **housing provision** in local development plans. Government guidance (which is more recent than the DCLG dwelling definition) is that student accommodation units can only be included within the housing supply “...based on the amount of accommodation it releases in the housing market.” (Planning Practice Guidance Reference ID: 3-042-20180913).

2.56 The Council has not produced any evidence to demonstrate how market housing supply has been increased by students transferring from traditional private sector shared housing. Indeed, the available evidence presented in the City of York Council Strategic Housing Market Assessment June 2016 is that new purpose-built student accommodation has not displaced students from market or family housing. Paragraph 10.67 of the SHMA states:

We have undertaken some qualitative research on the student housing market. This revealed there was an increase in capacity as new purpose-built accommodation has been built on and off campus. However, it was discovered that this did not reduce demand for traditional private sector shared housing.

2.57 In addition, the Council has not demonstrated that students form part of the objectively assessed housing need nor demonstrated that new student housing accommodation would contribute towards meeting the housing requirement.

2.58 Furthermore, case law has established that in these circumstances purpose-built student accommodation cannot count towards the housing supply *Exeter City Council v Secretary of State for Communities and Local Government, Waddeton Park Limited, The R B Nelder Trust. Case No: CO/5738/2104*.

2.59 Removing these student units from the completions data provide a more realistic estimate for the completion of residential (Use Class C3) units. These are the figures used in our calculation of the backlog in Table 5 below.

Table 5 Housing completion backlog for the period 2012-2019

Year	Net Dwellings Added (Council Figures)	Less student units	Net C3 Dwelling units	2017 SHMA recommended figure	Backlog/ Surplus	Housing delivery test indicator
2012/13	482	0	482	953	-471	50.6%
2013/14	345	0	345	953	-608	36.2%
2014/15	507	0	507	953	-446	53.2%
2015/16	1121	579	542	953	-411	56.9%
2016/17	977	152	825	953	-128	86.6%
2017/18	1296	637	659	953	-294	69.2%
2018/19	449	40	409	953	-544	42.9%
Total	5,177	1,408	3,769	6,671	-2,902	

(iv) Commitments

2.60 We have obtained a list of the planning permissions that make up the Council's estimate of un-implemented planning permissions at 1st April 2018 (Appendix 4). The figure of 3,345 includes 95 student units which, for the reasons stated above should not be included in the housing provision figures. This reduces the commitments figure to 3,250. A further discount of 10% should be applied to account for non-implementation of a proportion of these commitments, giving a more robust figure of 2,925 dwellings for outstanding commitments.

(v) *Windfalls*

- 2.61 The Council's assessment of housing provision includes an allowance for 169 windfalls per annum from year 4 of the plan – 2,197 units in total. Guidance in paragraph 48 of the NPPF is that windfalls can be included in the calculation of five-year supply, i.e. not as a source of housing supply across the plan period. This is because the supply of windfalls is variable and including it across the plan period does not provide the certainty of delivery compared with actual allocations. In addition, once the plan is adopted and housing allocations confirmed, the pressure to deliver housing through windfalls should decrease. Other Authorities, for example Scarborough Borough Council, have adopted this approach whereby a windfall allowance is identified across the plan period but treated as a flexibility allowance to the allocations and not included in the housing provision. The Scarborough Local Plan Inspector has endorsed this approach and the plan has now been adopted.

Stage 3 – Critique of housing delivery

Meeting housing demand and delivery targets

- 2.62 It is envisaged that a high proportion of the total number of dwellings to be delivered over the plan period will be derived from the 19 strategic sites allocated in the Draft Plan. However, there is no real certainty over the rate of delivery that can be achieved on some of these sites.
- 2.63 For example, on the Strategic Site ST1 (British Sugar) development can only commence following a 3-year scheme of remediation. Outline consent was granted in 2018. Allowing a for a 2-year lead in following remediation, the first completions on this site are not likely until 2023. The difficulty in bringing forward Strategic Site ST5 (York Central) is also well documented. The draft plan envisages 1,700 new houses being built on this site within in the period 1 to 21 years and at a projected density which ranges between 95 – 125 homes to the hectare.
- 2.64 There is also a question over how the supply of new homes at York Central will be matched with (the existing) housing demand. The 2016 SHMA for York reveals that the highest level of demand for market housing in the city is for 2 and 3-bedroom

family homes whereas the outline planning application approved for York Central in May 2019 suggests that 70% of the dwellings on York Central will be apartments. There is also significant unmet demand for bungalows amongst retirees seeking to downsize.

2.65 According to local letting agents surveyed for the 2017 SHMA, the crucial gap in supply is for good quality family homes. However, there is no perceived shortage of flats or apartments. Based on projections of additional households between the years of 2017 and 2032, the SHMA also indicates that greatest need for market dwellings is for 3-bedroom homes, at 39.2% of additional dwellings. This is followed by two-bedroom homes (37.7%) and 4-bedroom homes (16.5%). The need for 1-bedroom dwellings is comparatively low at 6.6%.

2.66 Whereas the Plan appears to be reliant on the higher densities provided by apartment living to make a significant contribution to the overall supply of housing, the evidence presented in the SHMA suggests that this is not where the main area of demand lies.

2.67 To deliver a wide choice of high-quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, the advice contained within paragraph 50 of the NPPF is that local planning authorities should:

- plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);
- identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand

2.68 In its current form, it is not clear how the allocated sites and their associated yields will address this requirement. In addition, the Council powers to secure the proposed densities are weak.

2.69 Taking all the above factors into account, our estimate of the housing requirement compared with the Councils estimate as set out in Table 4 above is:

Table 6 Galtres Garden Village Estimate of Housing Requirement 2019-2035

Plan period 1st April 2019 to 31 st March 2035	Publication Draft Plan adjusted to 2019 start year	Proposed Modifications adjusted to 2019 start year	Our Estimate
Total Need 2019-2035 (16 Years)	13,872 (based on 867 per annum)	12,640 (Based on 790 per annum)	17,120 (based on 1,070 per annum)
Backlog	896 (56 x 16)	512 (32 x 16)	2,902
Gross Requirement	14,768	13,152	20,022
Unimplemented Permissions @ 1st April 2018	3,578 (As at 1/4/17)	3,010** (As at 1/4/18)	2925*** (As at 1/4/18)
Windfalls (from Year 4) @ 169pa	2,197	2197	0
Net Requirement	8,993	7,945	17,097

* Excluding student accommodation

** Includes 10% non-implementation discount.

*** Includes 10% non-implementation discount and excludes student accommodation

- 2.70 It is evident from this analysis that the Council's estimate of the housing requirement is significantly flawed and consequently substantial additional allocations are required to address that shortfall.
- 2.71 In addition to meeting housing land requirement during the plan period, the Council also have to exclude land from the Green Belt for development beyond the plan period to ensure green belt boundaries will endure for some time beyond the Plan Period. The Council propose to meet this objective by allocating housing land for the period 2033 to 2038. Using the Councils baseline requirement figure of 790, the requirement for the 5-year period beyond 2033 would be 3,950 dwellings. Using the Government's figure of 1,070 the requirement would be 5,350
- 2.72 We have taken the table of proposed allocations from table 5.1 of the Draft Plan as proposed to be modified. From that we have applied what we believe to be reasonable assumptions about the potential delivery trajectory from each site based

on the information provided in the table and other sources (Appendix 5). For example, we assume no delivery from the British Sugar site in the first 5 years of the plan for the reasons outlined in paragraph 2.60 above.

- 2.73 The allocations in table 5.1 of the Draft Plan, as amended, amount to 14,440 dwellings for a 21-year Plan period. Our analysis of the allocations indicates the following rates of delivery.

Table 7 Anticipated rates of housing delivery from Proposed Allocations

Timescale	Units	Units
Years 1-5	3,054	
Years 6-10	4,562	
Years 11 to 16	3,868	
Sub-total 16-year plan period		11,484
Years 17 to 21		2,448
Total 21-year period		13,932*

* Does not add to 14,985 as some site delivery extends beyond 2038

- 2.74 This simple analysis demonstrates that for the 16-year Plan period the housing provision is 5,613 dwellings short of our estimate of the housing requirement of 17,097 dwellings ($17,097 - 11,484 = 5,613$). For the 5-year period following the Plan period, the shortfall is 1,887 using the Submitted Plan figures ($((867 \times 5) - 2448)$) or 2,902 short using our figures ($((1070 \times 5) - 2,448)$).

Stage 4 - 5 Year Supply

- 2.75 Our analysis above demonstrates that the housing land requirement in the proposed modifications for the 16-year plan period is significantly flawed. Of equal concern is the lack of supply in the early years of the plan required to ***“...significantly boost the supply of housing...”***.
- 2.76 Our assessment of the 5-year supply is set out in Table 8 below and is in line with generally accepted practice. The steps in our assessment are:

- I. To provide a fair indication of the range of what the 5-year housing land supply position might be, we use both the Council's housing requirement figure of 790 dwellings per annum and our assessment of the annual requirement of 1,070 dwellings per annum to arrive at a five-year requirement.
- II. We then add the undersupply assessed against each of the housing requirement figures for the period of 2012 to 2019. This is known as the "Sedgefield Method" of calculating the 5-year supply and assumes any undersupply is made up in the 5-year calculation period and not spread over the remaining years of the Local Plan. This is the approach favoured by National Planning Guidance which recommends:

The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5-year period (the Sedgefield approach).

Paragraph: 044 Reference ID: 3-044-20180913

- III. The Council has failed the housing delivery test for 6 of the last 7 years when housing delivery has fallen below 85% of the 2017 SHMA requirement (See Table 5 above). In these circumstances, National Planning Policy recommends that a 20% buffer should be added to the housing requirement.
 - IV. We take our adjusted calculation of unimplemented permissions of 2,925 (Paragraph 2.57 above).
- 2.77 Our assessment of 5-year supply is set out in Table 5 below. We provide 2 variants of the 5-year supply:
- In the first calculation, our assessment assumes the supply comprises just the existing commitments. That gives a five-year supply of 1.48 years based on the estimate of an annual housing requirement need of 1,070 dwellings per annum and our assumptions on backlog and commitments.
 - The 5-year supply using the Council's housing requirement of 790 and their assumption on backlog, commitments and windfall is 3.34 years.

2.78 In the second calculation we have included our estimate of supply arising from the proposed allocations from Table 7 above:

- Our estimate of supply from allocated sites in the first 5 years of the Plan is 3,045 dwellings. When this is added to the assumptions about the supply from existing commitments and windfalls, the five years supply using the Council figures is 6.39 years and using our figure for commitments, 3.01 years.
- The scale of the deficit in land supply identified by the 5-year calculation is significant not only in terms of the need to identify more land but also in terms of the longevity of undersupply. By any reasonable assessment, there has been a significant shortfall in the provision of housing every year since 2012 and for the period before that.

Table 8: Assessment of 5-year land supply

		Assessment using Councils Housing requirement of 790		Assessment using Government Housing requirement of 1,070	
A	Requirement	(5x790)	3,950	(5x1070)	5,350
B	Plus Shortfall 2012-2017	(7x32)	224		2,902
C	Sub total		4,174		8,252
D	20% buffer	(C x .2)	834.8	(C x .2)	1,650
E	Total 5-year Requirement	C+D	5,009	C+D	9,902
F	Annual requirement	(E ÷ 5)	1,002	(E ÷ 5)	1,980
G	Supply (Commitments)		3,010		2,925
H	Windfall		338		0
I	5-year supply	(G+H) ÷ F	3.34		1.48
J	Allocations Years 1 to 5		3,054		3,045
K	Potential supply	G+H+J	6,402		5,970
L	Potential 5-year supply	(K ÷ F)	6.39		3.01

OVERALL CONCLUSION ON THE REVISED HOUSING REQUIREMENT FIGURE

- 2.79 It is clear that the Council's approach to meeting the housing needs of the City of York are entirely at odds with the direction of Government guidance. The Councils appear content to continually reduce the housing requirement over time and ignore entrenched market signals indicating a restricted supply in the face of increasing demand.
- 2.80 The calculation above demonstrates the high level of latent and unmet demand in York and the precarious nature of the housing supply. In order to achieve a balance between the housing requirement and housing supply the requirement would have to fall significantly. On the basis of the background evidence prepared for the Local Plan, this scenario is highly unlikely.
- 2.81 Alternatively, the requirement / supply balance could be achieved by increasing the supply on the existing allocated sites in the 5-year period. Again, on the basis of the evidence available this is less likely. This is because a significant proportion of the draft housing allocations are large sites that will take several years before they deliver a significant increase in housing supply and our assumptions already assume a realistic rate of delivery from each site. There is only so much delivery the market can take or accept from each site. Increasing the amount of housing on the large strategic sites is likely to mean that more housing is delivered later in, or even after, the plan period and not in the early years of the plan. That rate of delivery is unlikely to increase without a fundamental adjustment to the business model of housebuilders and developers. **Providing additional allocations that include sites such as the Galtres site that can deliver houses in the first 5 years of the plan period will greatly assist in addressing that shortfall.**
- 2.82 Such an approach would comply with National Planning Guidance which advises:

To ensure that there is a realistic prospect of achieving the planned level of housing supply, the strategic policy-making authority should bring forward additional sites from later in the plan period, over and above the level

indicated by the strategic policy requirement, and any shortfall, or where applicable the local housing need figure. These sites will provide additional flexibility and more certainty that authorities will be able to demonstrate a sufficient supply of deliverable sites against the housing requirement.

Paragraph: 037 Reference ID: 3-037-20180913

3.0 REPRESENTATIONS ON GREEN BELT EVIDENCE BASE

Planning Policy Context

3.1 Before proceeding to address the updated Green Belt evidence base, we set out what we consider to be the main policy guidance for assessing the evidence base.

3.2 Under the heading Protecting Green Belt the NPPF reaffirms the longstanding aim of Green Belt policy which is to:

Prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

3.3 The NPPF states the purposes of including land in the Green Belt which are:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

3.4 Paragraphs 83 to 85 are particularly relevant to the York Daft Local Plan. Paragraph 83 states:

Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

3.5 Paragraph 84 emphasises that:

When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.

- 3.6 Paragraph 85 expands on the issue of green belt permanence referenced in paragraph 83. It adds:

When defining boundaries, local planning authorities should (inter alia):

- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;....*
- *where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;....*
- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period;...*

- 3.7 The advice in paragraphs 83 to 85 of the 2012 NPPF is repeated in paragraphs 138 to 139 of the 2019 NPPF.

Regional Policy

- 3.8 The saved policies YH9 and Y1 of the RSS relating to Green Belt remain extant and therefore carry weight. They state:

Policy YH9, Green Belts

"C The detailed inner boundaries of the green belt around York should be defined in order to establish long term development limits that safeguard the special character and setting of the historic city."

Policy Y1, York Sub-Area Policy

Plans, strategies, investment decisions and programmes for the York sub area should:

C Environment

- 1. In the city of York LDF, define the detailed boundaries of the outstanding sections of the outer boundary of the York Green Belt about 6 miles from York City Centre and the inner boundary in line with Policy YH9C"*
- 2. Protect and enhance the nationally significant historical and environmental character of York, including its historic setting, views of the Minster and important open areas.*

Response to the Council's Evidence Base

3.9 In their letter of 25th July 2018 to the Council the Inspectors commented:

As we understand it, there has at no time been an adopted development plan for York with an adopted policies map identifying the Green Belt, or at least not its boundaries. The Local Plan now sets out to rectify this. It proposes to designate land as Green Belt and to delineate Green Belt boundaries.

3.10 The Inspector's letter posed the following questions to the Council:

- i. For the purpose of paragraph 82 of the NPPF, is the Local Plan proposing to establish any new Green Belt?*
- ii. If so, what are the exceptional circumstances for so doing, and where is the evidence required by the five bullet points set out at paragraph 82 of the NPPF?*
- iii. If not, does the Local Plan propose to remove any land from an established Green Belt? If it does, is it necessary to demonstrate that exceptional circumstances exist to warrant that approach? Or is it the case that the Local Plan establishes the Green Belt boundaries for the first time, such that the exclusion of land from the Green Belt – such as at the 'garden villages', for example – is a matter of establishing Green Belt boundaries rather than altering them, in the terms of paragraph 83 of the NPPF?*

Notwithstanding all of the above, it is not clear to us how the Council has approached the task of delineating the Green Belt boundaries shown on the Policies Map submitted. Unless we have missed something, no substantive evidence has been provided setting out the methodology used and the decisions made through the process. We ask that the Council now provides this.

3.11 In response to these questions the Council has produced an extensive addendum to explain its approach to defining the York's Green Belt Boundaries. For the reasons already outlined in our original representations (April 2018) we believe the Council has addressed the Green Belt issues on an entirely erroneous assumption that is highlighted by the questions the Inspectors have posed and that the Council attempts to answer. This erroneous approach becomes evident in the answers and statements in Section 2 of the Addendum where the Council set out the scope of the addendum.

3.12 Our response to the Inspectors questions, having regard to the addendum produced by the Council, is set out below following the order of the questions in paragraph 3.10 above.

- (i) We believe the Local Plan is not trying to establish new Green Belt. Nor should it be seeking to establish new Green Belt. The role of the Local Plan is clearly set out in saved regional planning policies and has been accepted and endorsed by Inspectors on appeal. The purpose of the Local plan is to define the inner and outer boundaries.
- (ii) Given our answer in (i), the Council does not have to demonstrate any exceptional circumstances for establishing new Green Belt
- (iii) We believe this question encapsulates the key issue for the Local Plan in respect of the Green Belt. Regional Policy has established the general extent of the Green Belt. We agree with the second part of the Inspectors question, that in establishing the Green Belt boundaries for the first time, it follows that the exclusion of land from the Green Belt – such as at the 'garden villages', for example – is fundamentally a matter of establishing Green Belt boundaries rather than altering them, in the terms of paragraph 83 of the NPPF.

It will help in understanding this process to be aware that there is a key omission in saved Regional Policy YH9C. The full wording of Policy YH9C in the 2008 Approved Regional Guidance for Yorkshire and the Humber was:

*The detailed inner boundaries of the Green Belt around York should be defined in order to establish long term development limits that safeguard the special character and setting of the historic city. **The boundaries must take account of the levels of growth set out in this RSS and must also endure beyond the Plan period.***

The highlighted sentence, for whatever reason, never made it into the save policy – possibly because it refers to “...levels of growth...” that were not saved. However, the intention is clear and the inescapable logic of the current

process is that in defining the detailed Green Belt boundaries, the Council must exclude land required to meet the growth of the City.

Much of the commentary relating to the Green Belt both from the Council and other respondents on the Local Plan Consultations, speaks from a position that assumes the Green Belt boundaries are fixed in an adopted plan and that any suggestion that sites should be allocated for development will result in land being taken **out** of the Green Belt (in which case the second sentence of paragraph 83 of the NPPF would apply i.e. Green Belt boundaries should only be altered in exceptional circumstances).

This is, however, an erroneous assumption because the Green Belt boundaries around York are being defined (or established) for the first time. They are not being altered. In this case, paragraph 85 of the NPPF is therefore the Key advice to be considered. In defining / establishing boundaries the Council must meet the identified requirement for sustainable development i.e. it must allocate land to meet identified needs for housing, employment, leisure etc... and other needs. This is exactly what the missing sentence of Policy YH9C was referring to.

In other words, **it is not a question of what land should be taken out** of the Green Belt. The Council is at the point of deciding what land **should not be included** in the Green Belt in order to meet the identified requirements for sustainable development.

- 3.13 The Council has therefore misunderstood and wrongly applied NPPF policy. This misunderstanding is captured in paragraph 2.13 of the Addendum which states:

This addendum also explains why exceptional circumstances exist to justify alterations to the general extent of the Green Belt, in order to bring forward strategic sites to meet development needs.

- 3.14 The erroneous approach taken by the Council to defining the Green Belt boundaries has serious consequences in its attitude to meeting the needs for sustainable development over the plan period because it has resulted in an overly restrictive

approach to identifying land for housing and other development needs on the mistaken assumption that those development needs had to constitute “exceptional circumstances”. This has, in turn, resulted in an erroneous approach to the issue of safeguarded land

Safeguarded Land

- 3.15 Paragraph 85 of the NPPF advises that when defining Green Belt boundaries for the first time, local planning authorities should identify areas of ‘safeguarded land’ between the urban area and the Green Belt, to meet longer-term development needs beyond the plan period and make clear that the safeguarded land is not allocated for development at the present time.
- 3.16 The failure of the Council to address this requirement is a fundamental failing of the Local Plan and goes to the heart of the Soundness of the Plan.
- 3.17 As already stated, the Green Belt boundaries around York are being defined (or established) for the first time. They are not being altered. The Council is at the point of deciding what land should not be included in the Green Belt in order to meet the identified requirements for sustainable development.
- 3.18 Critically, the Council must demonstrate to the Local Plan Inspector that the Green Belt boundaries will not have to be altered at the end of the plan period. As we have demonstrated in Section 2 of this evidence, the Draft Plan has not allocated adequate land to meet housing needs with the plan period and has failed to exclude land to meet longer-term development needs stretching **well beyond** the plan period as recommended by paragraph 85 of the NPPF.
- 3.19 It can do this by including in areas of safeguarded to meet development needs beyond the plan period. The 2013 Preferred Options Draft Local Plan sensibly included a reasonable amount of safeguarded land to ensure the proposed Green Belt Boundaries would remain permanent beyond the Plan period. Unfortunately, this sensibility appears to have been abandoned.

3.20 Exactly what constitutes "...well beyond..." the plan period was considered by officers in a report to the Local Plan Working Group on 29th January 2015. Officers has sought advice from John Hobson QC who was asked to advise on the approach which should be adopted in relation to the determination of the Green Belt boundary in the preparation of the York Local Plan In particular he was asked to consider how long beyond the Plan period should a Green Belt endure once it is defined in a statutory plan.

3.21 In response Counsel advised:

9As paragraph 85 makes clear this involves consideration of the development needs which are to be met during the Plan period, and also the longer term development needs, "stretching well beyond the Plan period". Quite how far beyond is a matter of planning judgment, but in my opinion a 10 year horizon beyond the life of the Plan as mentioned in my Instructions would be appropriate.

3.22 Counsels advice concluded with:

16 In my opinion if no safeguarded land is identified in the emerging Local Plan this would give rise to a serious risk of the Plan being found unsound. There would be a failure to identify how the longer term needs of the area could be met, and in particular a failure to indicate how those longer term needs could be met without encroaching into the Green Belt and eroding its boundaries.

17. The only argument which it seems to me the Council could deploy to avoid this danger is to be able to demonstrate that there is sufficient land outside the Green Belt boundary which will be suitable for meeting the need for further development, and which is likely to be available when those needs arise. The important point is to be able to demonstrate that the Green Belt boundary will not be affected. I assume many authorities have adopted Local Plans without including safeguarded land. It would have been appropriate for them to do so in accordance with their local circumstances. However, I am unaware of a situation comparable to the circumstances in York.

3.23 This advice was reported to the January 2015 LPWG with a recommendation:

*23. It is recommended that Members of the Local Plan Working Group recommend Cabinet to:
Agree option 1 in this report to include safeguarded land designations in the Plan to ensure that the Green Belt will endure for a for a minimum of ten years beyond the end of the Plan period.*

Reason: So that an NPPF compliant Local Plan can be progressed.

- 3.24 Two previous Local Plan Inspectors in 2000 and 2012 both dismissed the draft Development Plan due to a lack of evidence confirming that Green Belt boundaries would endure beyond the Plan period. Questions about the permanence of the Green Belt boundary beyond the plan period have also been raised by Selby District Council.
- 3.25 The omission of this key component of the Local Plan spatial strategy is a serious weakness and may well result in the Plan being found unsound, particularly as the Plan period is only up to 2033 and from the point of anticipated adoption in 2020/21 it will only be a 12-year plan with land identified for development needs for an further 5 years. This would give a Green Belt Boundary of 17 years as against a 25-year boundary that would be provided by a 15-year plan with safeguarded land for potential development needs 10 years beyond.

Assessment of Galtres Site against the purposes of Green Belt and the Councils Methodology

- 3.26 In order to determine whether it is appropriate to allocate the Galtres site to meet the development needs of the City and exclude the site from the Green Belt, the site is assessed against the 5 purposes of the Green Belt:
- I. To check the unrestricted sprawl of large built-up areas**
- 3.27 The allocation of the site will assist in meeting identified requirement for sustainable development. The allocation of the site will enable the Council to define Green Belt boundaries that will endure beyond the plan period and therefore check the unrestricted sprawl of the larger urban area.

2. To prevent neighbouring towns merging into one another

- 3.28 The Council's Green Belt appraisal as set out in the Addendum demonstrates that the site does not perform an important role in preventing neighbouring town merging into one another.

3. To assist in safeguarding the countryside from encroachment

- 3.29 The allocation of the site will assist in meeting an identified requirement for sustainable development. The allocation of the site will enable the Council to define Green Belt boundaries that will endure beyond the plan period and therefore safeguard the countryside from encroachment.

4. To preserve the setting and special character of historic towns

- 3.30 In the Council's Green Belt Appraisal, the site is not identified as being important to the setting or special character of the City (confirmed by our Heritage Appraisal). It is not Stray Land, Green Wedge, an area preventing coalescence, a river corridor or as an area retaining the rural character of the city. This is also confirmed by the landscape appraisal submitted with the representation which confirms that there will be no significant effects on views of the York Historic Core and its context, nor significant effects on views from the Historic Core. Therefore, there is no risk to the setting and special character of York as a historic city.

- 3.31 Furthermore, the Galtres Village site fits comfortable with the Council's spatial strategy of prioritising development within and /or as an extension to the urban area and through the provision of new settlements in order to minimise harm to York's historic character. (paragraph 5.36 of Topic Paper TPI). The Galtres site will reinforce the special character and setting of the historic city and its clock face of settlements.

5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land

- 3.32 There are few areas of York in need of regeneration. Most, if not all, of the few remaining brownfield sites have planning applications pending or redevelopment proposals outstanding. In view of the scale of additional house allocation required to

meet the objectively assessed housing needs of the City, significant additional housing allocations are required. In this context the development of the site will have no impact on the viability of remaining brownfield sites in the City.

4.0 SUSTAINABILITY APPRAISAL

- 4.1 The updated evidence base published with the proposed modifications included a Sustainability Appraisal Report Addendum. This Sustainability Addendum included an audit trail to explain the further technical officer analysis of sites Between Pre-Publication consultation 2017 and Publication 2018 which included updates to availability and deliverability, analysis of further evidence in relation to show stoppers and technical officer comments.
- 4.2 The audit trail confirmed that although the Galtres site (Ref 964) had not been allocated at the Preferred Sites Consultation or Pre-Publication Draft Plan stage, by the Publication Draft Stage officers had considered the site suitable for allocation as previous constraints has been overcome. Appendix K of the Publication Draft Plan Sustainability Appraisal explained:

Following further consideration of responses for a revised boundary (site 964), officers considered that there remained concerns regarding landscape, access and ecology. However, given the new location of the site, it was considered to have reduced significant concerns and there was more potential for mitigation. Therefore, officers included the site as a potential for allocation recognising the risks that this was a revised boundary. The site was not taken forward by Members at Executive January 2018

5.0 CONCLUSIONS

- 5.1 There is a clear imperative for the Council to “...significantly boost the supply of housing...” as required by the NPPF. The draft Local plan does not achieve this objective. More recent Government housing requirement figures for York and our analysis demonstrates that the Draft Plan will have to allocate land for over 5,600 additional houses in the Plan period to 2033 ((Our estimate of housing requirement of 17,097 (Table 6) less our estimate of delivery 11,484 (Table 7))
- 5.2 The draft plan has not demonstrated that the proposed Green Belt boundaries will endure beyond the plan period. Additional land will have to be excluded from the Green Belt either through allocations and/ or safeguarded land to provide robust Green Belt boundaries for at least 10 years beyond the Plan period.
- 5.3 The proposed new settlement – Galtres Village - can address both these shortcomings of the Plan. Officers consider the site to be a sustainable additional housing allocation.
- 5.4 An opinion survey has clearly established that residents of York overwhelmingly believe that there is a need for new homes in and around York, mainly to serve the needs of the existing population but also to provide housing for those who wish to move into the area to live or work. In total, eight-in-ten people interviewed for the survey agree that affordable housing should be *‘a top priority for the Council’*
- 5.5 The survey also established general support for the Galtres scheme, with 30% of respondents giving the top scores of 9-10 out of 10 and a further 35% giving scores of 7-8 and an overall mean score of 7.1 out of 10. Younger respondents in particular (aged under 35) offered the strongest support, perhaps reflecting the fact that this age group faces the biggest housing challenges (for example, the majority rent their home).
- 5.6 However, perhaps the most revealing finding in this survey is that 76% would like to see the proposed development included in the City of York Council Local Plan and only 7% said with certainty that they would not.

- 5.7 The Galtres Garden Village will be a new settlement to York which echoes the “garden village” ethos of New Earswick and Derwenthorpe, with housing set within well landscaped surroundings as part of a low-carbon development. The proposed allocation will deliver a high quality, sustainable residential environment that will provide 40% of its dwellings as affordable housing.
- 5.8 It is considered that the proposed vehicular accesses to the site can be delivered in such a way that the highway network is not compromised. A dedicated cycle route through a proposed linear park to the west of the site will provide direct access to Huntington. The development will not harm the City’s historic character or setting nor adversely affect other interests of acknowledged importance.
- 5.9 The Galtres Development Company will deliver affordable housing in an innovative way that will provide significant benefits form the City. The development company proposes to work in partnership with Home Housing and – if possible - the Councils housing development company to deliver major tranches of affordable housing.
- 5.10 Community facilities can be provided early in the development programme, thus creating a primary school, retail and other outlets which will constitute a significant benefit to the development’s residents and to local population who access the site.
- 5.11 The land is available, the development is achievable, and the scheme can deliver almost 1,753 dwellings and in a range of affordable and market housing and retirement living that will make a significant contribution to address the three major housing issues facing the City of York for the foreseeable future
- The Shortage of housing
 - The shortage of affordable housing
 - The shortage of elderly persons accommodation
- 9.11 Without additional major sustainable housing allocations such as Galtres village these requirements will continue to go unmet and the housing needs of the people of York and their children will not be served.

APPENDICES

Provided as Separate documents

Appendix I

Galtres Garden Village Development Prospectus



Galtres Garden Village

YORK

- 40% Affordable homes for citizens of York
- A fantastic Garden Village, in a landscaped environment supporting wildlife and parkland
- A significant older persons offer with bungalows, apartments and care facilities
- A central Village hub including shops , school and community facilities
- A commitment to low/zero carbon energy solutions and sustainable, greener, lifestyle
- Excellent transport links and transport strategy.



The Galtres Garden Village Proposes...

Perhaps uniquely these homes can be delivered immediately, helping to address the critical shortage of housing in York NOW. There is no significant hindrance to starting the scheme and little extra infrastructure is required.

Galtres Garden Village is a proposed development of land to the north of North Lane and Monk's Cross and includes the delivery of up to 1740 new homes that can be delivered over the next ten years.

Crucially, this includes a 40% allocation (c. 700 units) of affordable homes and pays particular attention to homes for older people, key workers and first-time buyers. This has been made possible by a partnership with Home Housing, a well-respected and strong partner that is keen to invest in community focused housing in the City.

This partnership will offer mixed tenure housing with a variety of home ownership and rented options including

a varied selection of house types, from bungalows to larger detached properties.

Galtres Garden Village is not just about building new homes, it is about the creation of a new and self-sufficient community with all of the local amenities needed to support a new settlement: a care village for retirement living, a community hub, village green and recreation facilities as well as a school, surgery and shops.

The 'Garden Village' concept is embraced throughout with a landscape-led design which draws upon the classic Rowntrees philosophy of creating a Garden village with a community atmosphere, linked to healthy living, training and education.

Galtres Garden Village A Partnership To Deliver New Homes That York Needs

Galtres Garden Village is a unique opportunity to address the significant shortfall of the housing that is needed in the City of York.

It is unique in that it can deliver a viable and flexible solution, working with Home Housing to create a new community that embraces the needs of the elderly, key workers and working families wanting to live affordably in York.

With landscape and environment at the heart of its design and the Rowntree legacy of 'Community First' reflected throughout, it opens access to natural country parkland and embraces health, wellbeing and harmonious living.

Galtres Garden Village is a critical project for the future of housing in the city to help ensure that locals who live in York can stay in York, whatever their circumstances.

Galtres Garden Village is being promoted by a partnership of Galtres Garden Village Development Company (GGVDC) working with Home Housing. Members of GGVDC were responsible for the delivery of Monks Cross/Vanguard Shopping Park.



A 40% allocation of affordable homes



A fantastic Garden Village designed in a landscaped environment supporting wildlife and parkland



A central village hub including shops, school and community facilities



A commitment to low/zero carbon energy solutions and sustainable, greener, lifestyle



Excellent transport links and transport strategy



A significant allocation for the elderly with bungalows, apartments and care facilities

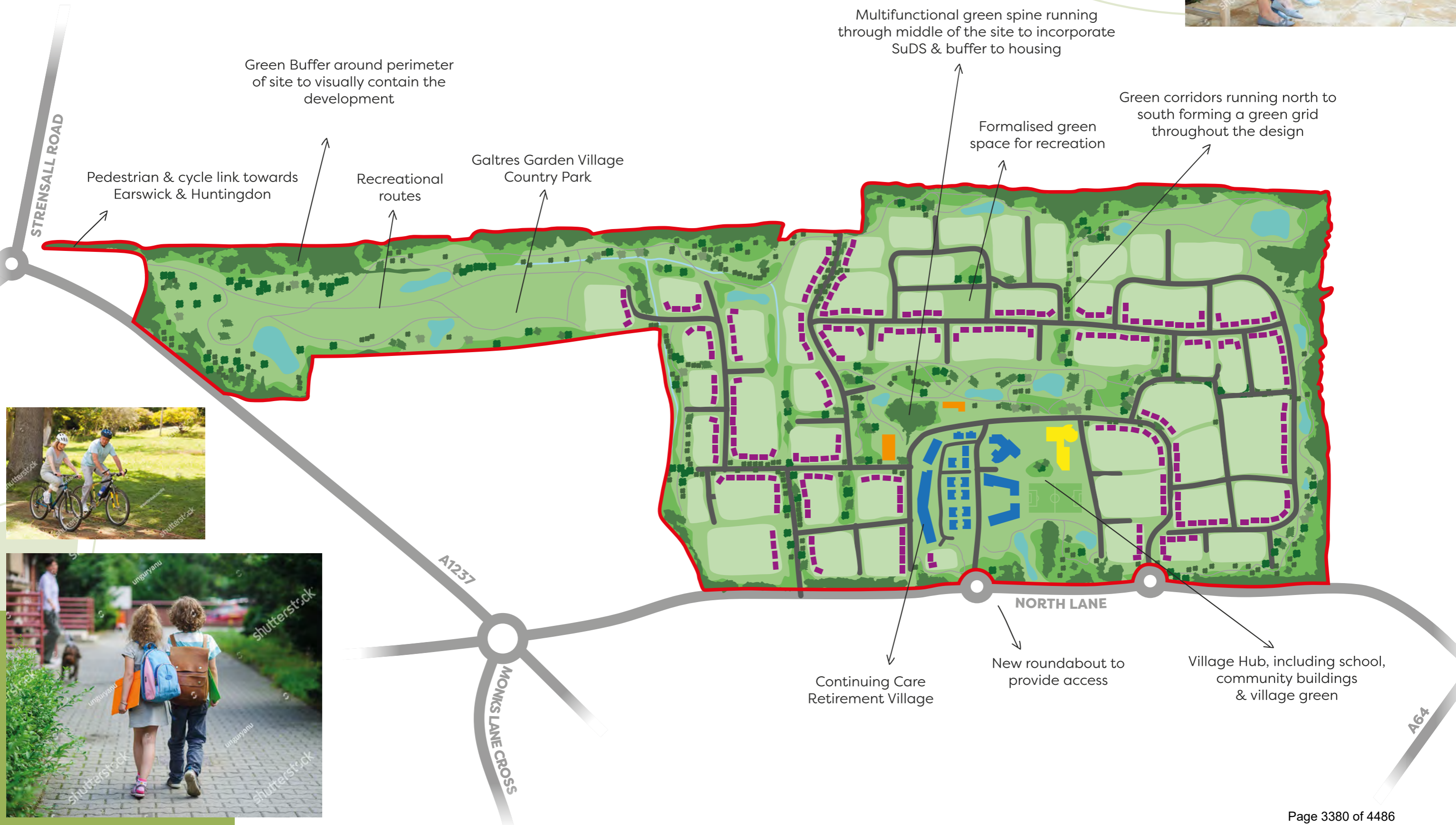
Why Is It Important To Support This?

The City of York has a critical shortage of housing and is under pressure by the Government to address a significant shortfall, particularly for an ageing population and the lower paid.

The proposed development pipeline within the draft Local Plan has lost a key scheme and as a result the draft plan must go back out to consultation. The Galtres Garden Village Development Company is proposing a site which can come forward quickly, will enhance the Plan and will replace the homes lost to the program.

The Masterplan

- Housing
- Community Buildings
- Continuing Care Retirement Village
- School



Multifunctional green spine running through middle of the site to incorporate SuDS & buffer to housing

Green corridors running north to south forming a green grid throughout the design

Formalised green space for recreation

Green Buffer around perimeter of site to visually contain the development

Pedestrian & cycle link towards Earswick & Huntingdon

Recreational routes

Galtres Garden Village Country Park

Continuing Care Retirement Village

New roundabout to provide access

Village Hub, including school, community buildings & village green



Consulting & Delivering What York Residents Want

Through independent commission, the Galtres Garden Village Development Company has already surveyed over 800 York residents from every ward in the city, and 100 people who commute daily into York. The verified results concluded overwhelming support for a mixed scheme like this, that is thoughtful of the wider community's needs and cares about the environment. The need to build more homes is clearly supported and especially those that are more affordable to working families. This scheme balances this need with a concept that is in keeping with York's beautiful countryside landscape.



Embracing Existing Infrastructure & Greener Travel

The development team is committed to work closely with the Council to address traffic and congestion and maximise the benefits of widening the ring road in this area. The improvements underway on the outer ring road will help support the transport needs of the site, and residents will have easy access to the superb Vanguard shopping facility at Monk's Cross. A dedicated transport strategy will take into account the changing nature of car ownership, public transport and cycling it aims to encourage a greener, healthier lifestyle.



Landscape At The Heart Of The Design

The scheme takes land which is currently closed and private making it open and accessible to all.

It will create a new country park for the public, designed within the existing landscape of hedgerows and water courses.

The new village will be out of sight from the nearby villages of Huntingdon and Earswick and stand separately as a new community sitting neatly in its own environment.

Critically, at the heart of the proposal is the Green agenda. The garden village approach emphasises the 'human' nature of village life. Certainly, the green routes, pathways and flora will be central to the designs but so will the creation of the village facilities and transport links. These all make towards a self-contained community able to access services without making unnecessary journeys.



Low - Zero Carbon Energy & Sustainable Design

The allocated land has the space to create low/zero carbon energy solutions. The team can explore the use of ground and air source energy, with photo voltaic technology and sustainable drainage all playing their part. Soon all new build homes will have to be fossil fuel free and this scheme will be ready to meet this challenge.



Galtres Garden Village

YORK

Next Steps

The Galtres Garden Village Development Company is working hard to have its proposed development included in the revised Local Plan which is out for consultation.

We are inviting the Council to participate in supporting the delivery of the village so that housing provision serves those that need it at affordable levels. The development will ultimately become a long-term asset to the City of York and its citizens.

Furthermore, it is able to start the process immediately to help alleviate the current crisis.

<http://galtresgardenvillage.com/>



**GALTRES GARDEN VILLAGE
DEVELOPMENT COMPANY**

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Appendix 2

Galtres Garden Village York Residents Research

Galtres Garden Village – York Residents Research 2018

For Galtres Garden Village Company

30 March 2018



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I. Executive Summary

I.1 Background

- The Galtres Garden Village is a proposed residential development to the North of York. The Galtres Garden Village Development Company (GGVDC), a consortium of local landowners and consultants, was formed to take forward the Galtres Garden Village (GGV).
- GGVDC commissioned Qa Research to carry out a survey of residents in the City of York Council (CYC) area to understand views towards the proposal. Additionally, a survey amongst a small sample of York commuters was also undertaken.
- In total, 800 interviews were completed with York residents aged 16 or over (using a combination of telephone surveys and face-to-face interviews). Additionally, 83 commuters (defined as people who commute into the York area for study or work, but don't currently live in York although they would like to if they could) were interviewed face-to-face - findings from the commuters sample are not included in this Executive Summary.

I.2 Key Findings amongst York Residents

- York residents see a clear need for new homes in and around York, with 93% choosing at least one reason from a list of reasons why new homes might be needed. Primarily, the view was that new homes were needed to support the needs of existing residents, particularly so that *'...local young people can stay living locally'* (84%) and also more generally *'...to meet the needs of the local community'* (80%).
- When asked to consider what types of homes they would like to see built in the York area, affordability featured heavily with a desire for affordable homes *'to buy'* (88%), but also *'to rent'* (78%). In line with this, the most frequently selected property types were smaller homes, either as *'starter houses'* (84%) or slightly bigger *'family houses (2 or 3 bedrooms)'* (81%).
- The majority of respondents indicated that they *'agree'* that *'affordable housing for local people to rent or buy should be a top priority for the Council'* (81%) – in fact, the majority gave the highest possible score for this of 5 out of 5 (57%).
- Respondents were read a brief description of the proposed Galtres Garden Development (GGV) which focussed on its location;
 - One-in-four (24%) said they were aware of this development
 - The majority of respondents indicated that they felt this was an *'appropriate'* location by giving a score of either 4 or 5 out of 5 (55%)
 - However, 15% indicated to some degree that they felt this location was *'not appropriate'* by giving a score of 1 or 2.
- Respondents were asked to say how far they supported the development of the scheme, by giving their answer on a 10 point scale (where 10 means they fully support it);
 - With an average (mean) score of 7.1 out of 10 there is generally support for the development
 - Almost a third gave the highest scores of 9-10 (30%) indicating strong support for the scheme, while a further third gave scores of 7-8 (35%) which can also be considered as supporting the scheme
 - In contrast, the lowest scores of 1-4 were given by 13% of respondents, with around one-in-twenty giving the very lowest scores of 1-2 (7%).

- Respondents were asked to consider how different aspects of the scheme impacted on how likely they would be to support it;
 - The most appealing aspect was that when compared with similar schemes the GGV would include ‘...a greater proportion of affordable homes...’, something that three-quarters felt would make them ‘more likely’ (76%) to support it.
 - A similar proportion felt ‘more likely’ to support the scheme because ‘the company behind the scheme would work with housing associations to build the right mix of houses for the city’ (73%).
- A question was included which simply asked whether respondents felt that the GGV scheme should be included in the final version of the York Local Plan – 79% of respondents answered ‘yes’ they would like to see it included, while only 7% gave a firm ‘no’.

1.3 Conclusions

- Residents overwhelmingly believe that there is a need for new homes in and around York.
- The proposed Galtres Garden Village development has gained some awareness amongst York residents, as one-in-four (24%) indicated that they had heard of the proposal before the interview. This awareness was mainly driven by older residents and those living in wards near to the proposed GGV site.
- It’s important to note that this means that the majority of respondents (the remaining 76%) assessed the proposed development purely on the information contained within the survey, which included detail of the location (with supporting maps) and descriptions of the types of housing and facilities that the development would be likely to include.
- For most respondents this detail appears to have been sufficient for them to give their views on the proposed development, as consistently throughout the survey only small proportions said they ‘needed more information’ when given the opportunity.
- When asked how far they support the scheme, there was generally support, with 30% giving the top scores of 9-10 out of 10 and a further 35% giving scores of 7-8 and an overall mean score of 7.1 out of 10. Younger respondents in particular (aged under 35) offered the strongest support, perhaps reflecting the fact that this age group faces the biggest housing challenges (for example, the majority rent their home).
- However, perhaps the most revealing finding in this survey is that 76% would like to see the proposed development included in the City of York Council Local Plan and only 7% said with certainty that they would not.
- This is despite the fact that when asked to consider the planned location, the research recorded mixed views on how appropriate this was for housing development, although the majority of respondents (55%) indicated that they felt it was ‘appropriate’, a significantly higher proportion than felt it was ‘not appropriate’ (15%).
- Based on the descriptions included in the survey, respondents could readily identify aspects of the scheme that they ‘liked’ and a range of different things were chosen. Specifically, this included individual amenities such as the primary school, doctor’s surgery, care home and leisure facilities as well as the inclusion of affordable housing. However, in a more general way respondents made comments relating to the development and creation of a community and referenced these individual facilities as an integral part of this.
- Based on the detail included in the survey, respondents identified fewer elements that they ‘disliked’, focussing mainly on concerns around traffic and congestion.

2. Background and Objectives

The Galtres Garden Village is a proposed residential development to the North of York. The Galtres Garden Village Development Company (GGVDC), a consortium of local landowners and consultants, was formed to take forward the Galtres Garden Village (GGV).

Currently, (as of March 2018) the garden village is not included in the City of York Council Local Plan which is currently in draft format, but the GGVDC hopes that the garden village will be included in the final plan.

Research was required to understand the views of York residents towards the current housing situation in York and towards the proposed garden village development. GGVDC commissioned Qa Research to carry out a survey of residents in the City of York Council (CYC) area (referenced throughout this report as 'York residents').

Specifically, the main objectives of this research were to;

- Gather views amongst a robust and representative sample of York residents
- Understand perceptions of the current housing situation in York, exploring views on the level of development, priorities for development and the availability of housing generally
- Explore awareness and understanding of the proposed GGV development
- Establish levels of support or otherwise for the GGV
- Determine the proportion of York residents that would like to see the GGV included in the final CYC Local Plan.

In addition, a smaller parallel survey was also undertaken amongst a sample of 'commuters'. These were defined as people who commute into the York area for study or work, but don't currently live in York although they would like to if they could. This survey had the same objectives as that amongst 'York residents'.

This report outlines findings from both surveys.

3. Methodology

3.1 Survey of York Residents

In total, 800 interviews were completed with York residents aged 16 or over using a combination of telephone surveys and face-to-face interviews. The face-to-face interviews specifically targeted younger residents and this approach was adopted to ensure that younger residents were sufficiently well represented in the final sample. In total, 653 interviews were completed by phone and the 147 face-to-face.

All interviews were completed by Qa Research's contact centre in York and interviewing was carried out between Friday 9 March and 22 March 2018.

To ensure a representative sample, quotas were set on recruitment based on ward, gender and age and weighting was applied at the analysis stage to ensure that the final sample was representative of the population as a whole.

Based on a sample of 800 surveys, at the 95% confidence level, findings are accurate to within +/- 3%.

3.2 Survey of Commuters

A survey of 83 'commuters' (defined as people who commute into the York area for study or work, but don't currently live in York although they would like to if they could) was completed face-to-face between 16 March and 27 March 2018.

No quotas were set on recruitment, but to ensure that the views of people living at different sides of the York were included, interviewer shifts took place in York city centre, Selby, Tadcaster, Garforth, Pocklington and Thirsk.

A sample of 83 interviews should be seen as indicative only and as providing guidance on the views of this audience.

4. Key Findings – York Residents

This section outlines findings from the survey of York residents

4.1 Sample Profile

The table below shows the profile of the final achieved sample based on ward.

Note: CYC Ward boundaries changed after the 2011 Census and data outlining the proportion of Adults aged 16 and over in each ward is not available. Therefore, the profile of the City of York Council area shown below is based on all residents.

Figure 1. Profile of respondents – distribution by ward

Ward	All Residents		All respondents (unweighted)		All respondents (weighted)	
	Count	%	Count	%	Count	%
Acomb	9,191	4%	34	4%	36	4%
Bishopthorpe	4,138	2%	16	2%	16	2%
Clifton	10,204	5%	48	6%	39	5%
Copmanthorpe	4,207	2%	10	1%	16	2%
Dringhouses and Woodthorpe	11,618	6%	50	6%	45	6%
Fishergate	10,109	5%	42	5%	39	5%
Fulford and Heslington	3,811	2%	15	2%	15	2%
Guildhall	15,830	8%	44	6%	61	8%
Haxby and Wigginton	12,023	6%	51	6%	46	6%
Heworth	14,452	7%	66	8%	56	7%
Heworth Without	3,941	2%	16	2%	15	2%
Holgate	12,721	6%	47	6%	49	6%
Hull Road	15,552	8%	60	8%	60	8%
Huntington and New Earswick	12,329	6%	42	5%	48	6%
Micklegate	12,819	6%	68	9%	50	6%
Osbalwick and Derwent	7,619	4%	26	3%	29	4%
Rawcliffe and Clifton Without	11,974	6%	44	6%	46	6%
Rural West York	7,892	4%	25	3%	31	4%
Strensall	8,260	4%	34	4%	32	4%
Westfield	14,010	7%	46	6%	54	7%
Wheldrake	4,156	2%	16	2%	16	2%
Total	206,856		800		800	

The table above confirms that interviews were completed with residents from all wards within the City of York Council area and that the distribution of interviews aligns with the population of each ward.

As a result, we can be satisfied that the findings in this report outline the views of a representative sample of residents based on geography.

The table below outlines the profile of the final achieved sample and compares this with the profile of all York residents (aged 16 or over) based on the 2011 Census;

Figure 2. Profile of respondents – age and gender

	All Adults 16+		All respondents (unweighted)		All respondents (weighted)	
	n	%	n	%	n	%
Age						
NET: 16-34	58,515	35%	258	32%	280	35%
NET: 35-64	74,345	45%	362	45%	360	45%
NET: 65+	33,415	20%	180	23%	160	20%
Total	166,275		800		800	
Gender						
Male	80,062	48%	378	47%	384	48%
Female	86,213	52%	422	53%	416	52%
Total	166,275		800		800	

Quotas were set on recruitment to ensure that both the age and gender profile of the final achieved sample were in line with the profile of the City of York Council area and the table confirms this. Consequently, the findings in this report outline the views amongst a representative sample of York residents based on age and gender.

The table below shows the employment status of respondents;

Figure 3. Profile of respondents – Employment status

	All respondents (weighted)	
	n	%
Employment status		
Employee in full-time job (30 hours plus per week)	269	34%
Employee in part-time job (under 30 hours per week)	138	17%
Self employed; full or part time	92	11%
Wholly retired from work	202	25%
On government supported training programme (e.g. Modern Apprentice/ Training for Work)	1	<1%
Full-time education at school, college or university	64	8%
Unemployed and available for work	11	1%
Unemployed due to long term illness	12	1%
Full-time carer for a disabled person (paid/ unpaid)	4	<1%
Looking after the home	15	2%
Doing something else	8	1%
Prefer not to say	4	1%
Total	800	

Reflecting the representative age profile of the final achieved sample, the table above demonstrates that the views of a range of different types of residents were gathered.

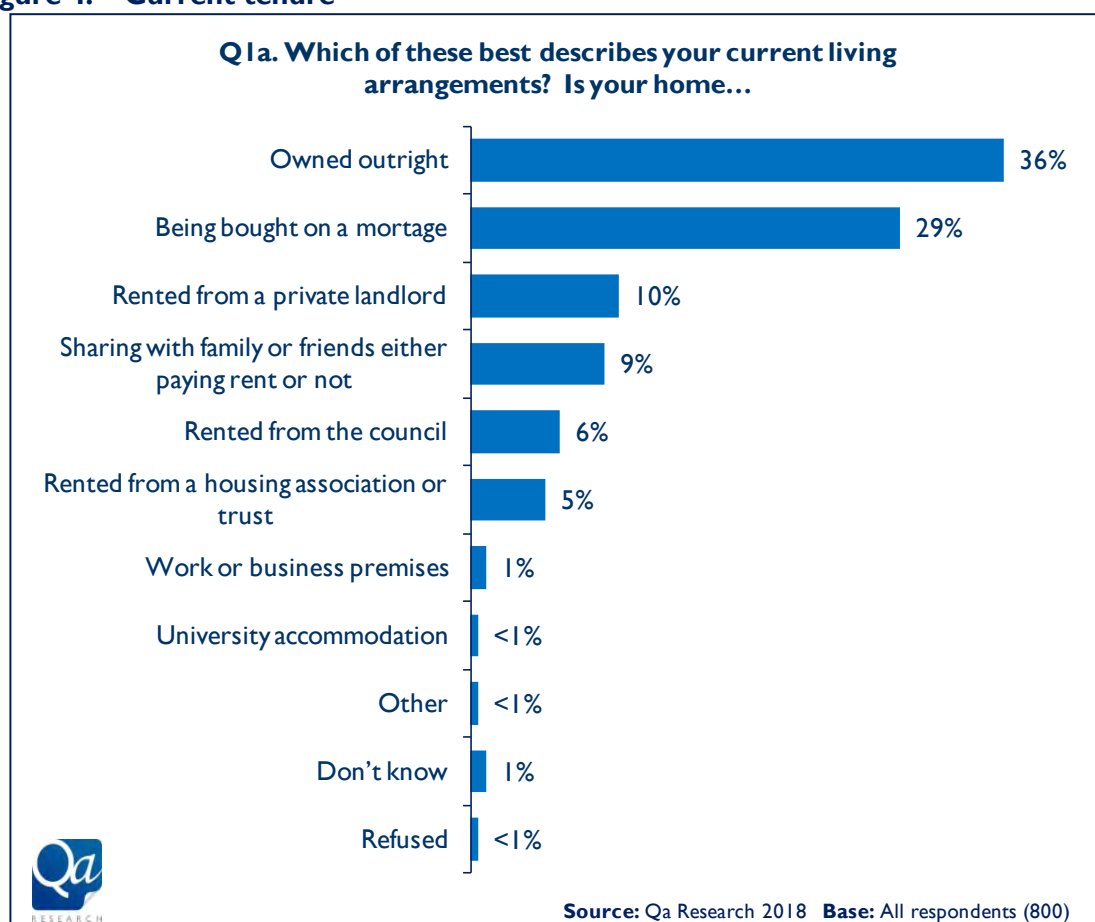
4.2 Respondents' Current Living Arrangements

This section summarises the existing living arrangements of respondents and their views on these arrangements and their suitability;

4.2.1 Type of accommodation

The chart below shows the tenure of respondents;

Figure 4. Current tenure



As would be expected, the sample contains a mix of owner-occupiers and renters. In total, 68% indicated that they owned their home, with it either 'owned outright' (36%) or 'being bought on a mortgage' (29%).

The proportion of renters was 30%, and these were spread between those that rent 'from a private landlord' (10%), 'from the council' (6%) or 'from a housing association or trust' (5%). Also included in the definition of renters is the 9% of respondents who said they were 'sharing with family or friends either paying rent or not'.

Throughout this report we have explored differences in opinion between 'owners' and 'renters' and these will draw out were a statistically significant differences exists.

The chart below shows the type of homes lived in by respondents;

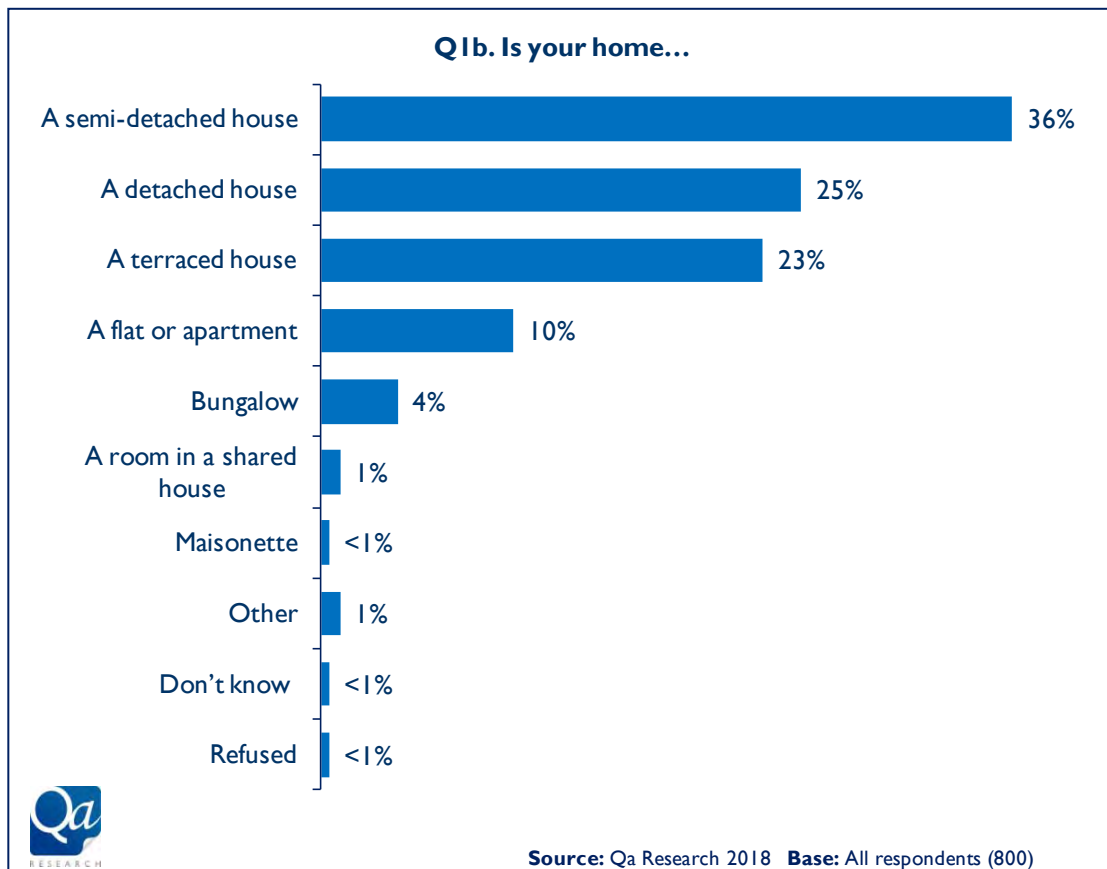


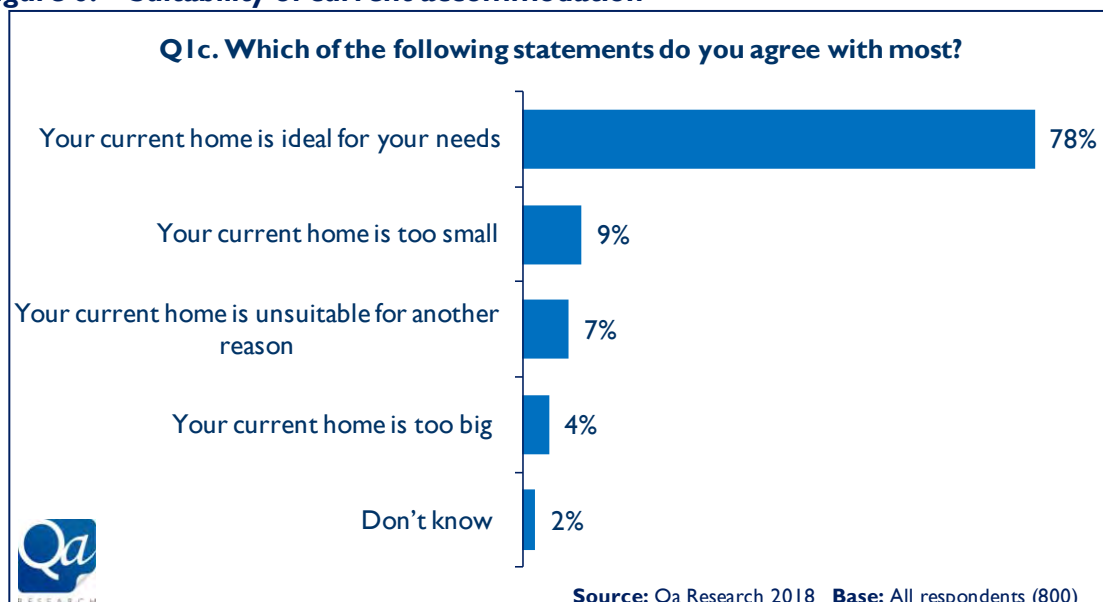
Figure 5. Current accommodation type

Again, as would be expected, respondents said that they lived in a range of housing types, reflecting the housing mix within York.

4.2.2 Suitability of current accommodation

Respondents were asked to assess whether they felt their current home was suitable for their needs and responses were as follows;

Figure 6. Suitability of current accommodation



It's clear from the findings above that most respondents feel they live in suitable accommodation (78%).

However, in total a fifth of respondents felt that their home was 'unsuitable' (20%). Specifically, almost one-in-ten felt that their 'current home is too small' (9%), twice the proportion that felt it was 'too big' (4%). Additionally, just over one-in-twenty felt it was 'unsuitable for another reason' (7%).

Some differences were evident here between different types of respondents. In particular, younger respondents were significantly more likely than older ones to feel that their home is 'unsuitable' (Aged 16-34: 29%, Aged 35-64: 16%, Aged 65+: 16%). This was mainly driven by a belief that their home was 'too small', something that 17% of respondents aged 16-34 felt was the case.

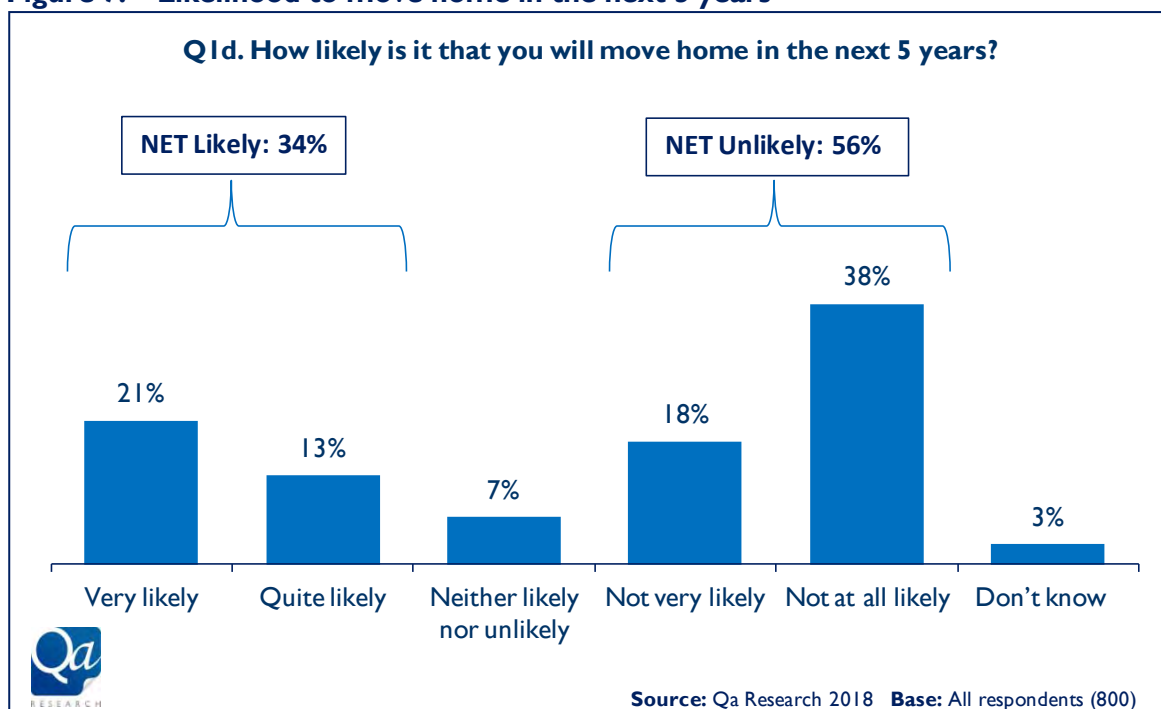
Additionally, respondents with larger families were more likely to feel that their accommodation is 'too small' – 26% of respondents with a household size of 5 or more respondents felt that this was the case.

In contrast, 7% of respondents in households with only 1 or 2 people felt that their home was 'too big'. It should be noted that 53% of respondents lived in 1 or 2 person households, but only 7% lived in households with 5 or more people.

4.2.3 Plans to move home

A number of questions were included to explore how likely it was that respondents would move home and where they were likely to go if they did. The first of these simply asked how likely respondents were to move in the next 5 years and responses were as follows;

Figure 7. Likelihood to move home in the next 5 years



As shown here, around a third felt that a home move in the next 5 years was 'likely' (34%), that's the proportion saying that it was either 'quite likely' (13%) or 'very likely' (21%).

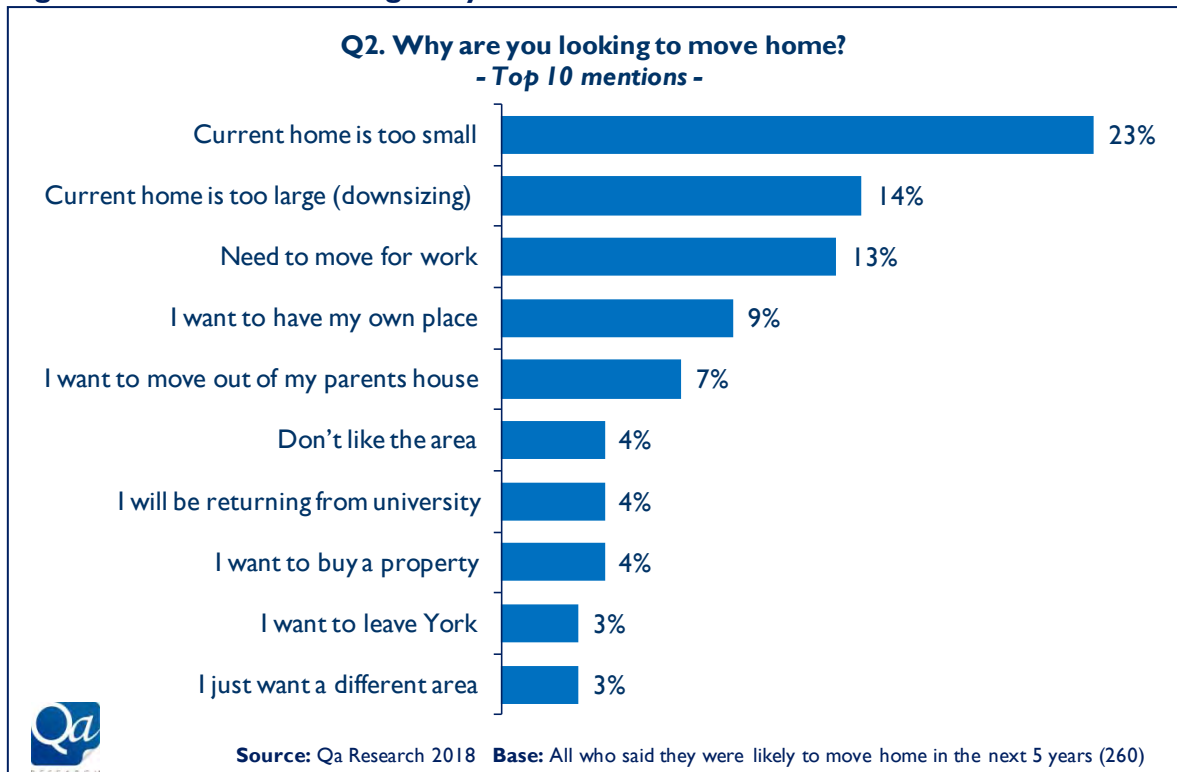
The proportion who felt this was 'likely' was significantly higher amongst younger respondents (Aged 16-34: 62%, Aged 35-64: 23%, Aged 65+: 10%).

Also, in terms of household size, it was highest amongst respondents living in households with 5 or more people, half of which felt they would be 'likely' to move in the next 5 years (52%).

Amongst those who earlier had described their home as 'unsuitable', 63% thought they'd be likely to move – this is more than twice the proportion amongst respondents who described their home as 'ideal for your needs' (27%).

Respondents who said they would be likely to move homes were then asked why this was. This was an entirely open question and similar verbatim comments have been 'coded' into over-codes for analysis. The top 10 reasons that came out at this question are shown in the chart below;

Figure 8. Reasons for being likely to move home



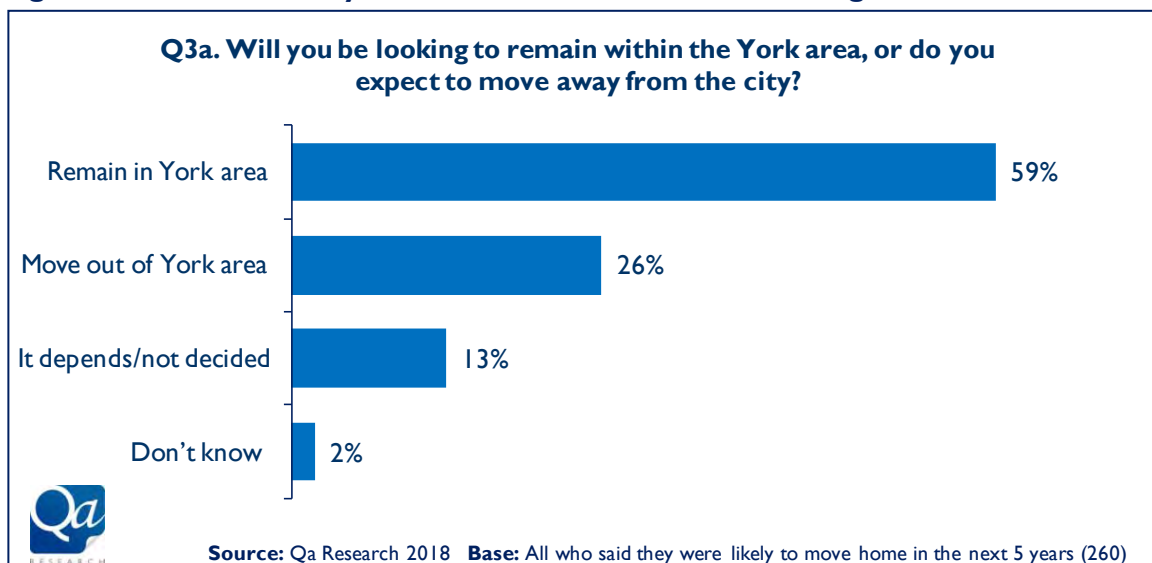
It's notable that respondents were most likely to mention reasons relating to their accommodation rather than the area they live in or another reason, with almost one-in-four of those who said they'd be likely to move in the next 5 years indicating that they would do so because their 'current home is too small' (23%).

These respondents also talked about moving because their home is 'too large (downsizing)' (14%) or to set-up home, indicating that they 'want to have my own place' (9%) or 'want to move out of my parents house' (7%) or 'want to buy a property' (4%).

Of course, some reasons given here reflect other aspects of peoples' lives, with respondents indicating that they 'need to move for work' (13%) while some 'don't like the area' (4%).

All who said they'd be likely to move in the next 5 years were also asked if they expected to remain in York, with responses as follows;

Figure 9. Whether likely to remain in York area after moving



The majority indicated that they expected to remain in York (59%), a proportion that increased to 85% amongst respondents aged 65 and over. It's also notable that two-thirds of those who said that their current home was 'unsuitable' said they'd be likely to 'remain in York' (67%), evidently expecting to be able to move to more suitable accommodation within the city.

Then, respondents who said they'd be likely to move in the next 5 years but expected to either 'move out of the York area' or had not decided if they would or not were asked why this was. This was a fully open question and verbatim comments have been 'coded' into over-codes for analysis and are shown below;

Figure 10. Main reasons for being unlikely to remain in York area

Q3b. Why expect to move out of the York area or are undecided.		
	n	%
For work related reasons	29	27%
Cheaper housing	23	21%
To go back home	10	9%
To move to another city	9	8%
To go to university	8	8%
For a change	6	6%
To find the right house or because of a specific property	6	5%
I will finish university	5	5%
To move closer to family or friends	5	5%
To move to a quieter or more rural area	5	5%
Other	8	8%

Base: All who are likely to move in next 5 years but expect to move out of York area or are undecided if they move out or not (101)

The previous table highlights that the main reason given here was *'for work related reasons'* (27%).

However, a fifth said they expected to move out of the area because they wanted to find *'cheaper housing'* (21%) which highlights that there are some residents who feel that they will have to leave the local area to find more affordable housing. Amongst the total sample of 800 residents, this proportion equates to 3%, so it's important not to over-state how many residents feel this way.

4.2.4 Barriers to buying own home and buying in York

Respondents who were currently renting were asked whether they expected to buy their own home in the next 5 years and in total 28% said they did.

Those that said they didn't expect to were asked whether anything was stopping them from buying their own home. This was a fully open question and verbatim responses have been *'coded'* into over-codes for analysis and these are detailed below;

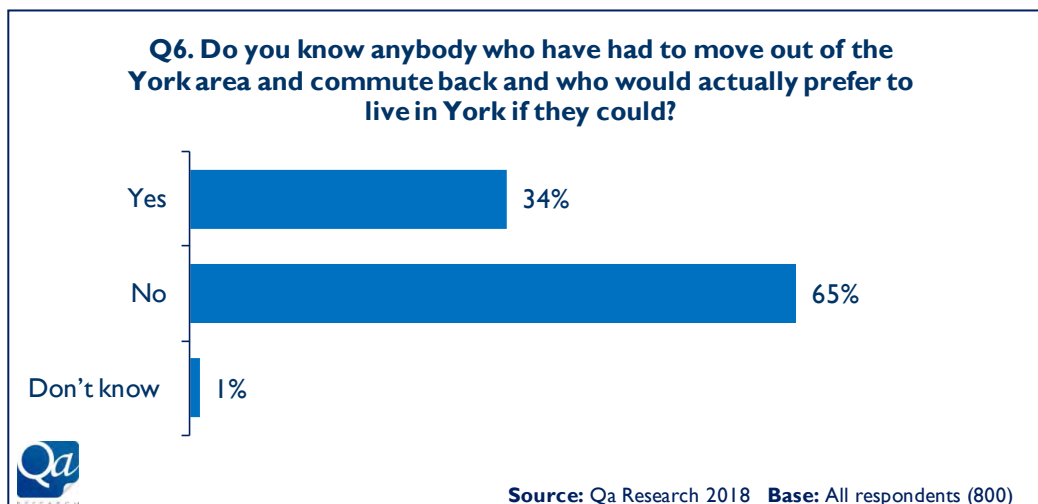
Figure 11. Barriers to buying own home in next 5 years (amongst renters)

Q5. Is anything stopping you from buying your own home?		
	n	%
House prices are too high	57	53%
Can't get the deposit together	46	43%
Can't get a mortgage/large enough mortgage	22	21%
Don't want to be a home owner	6	6%
I am still in education	5	4%
Suitable homes are not available	4	4%
Too old to buy a property	4	3%
I do not know where I want to live	2	2%
Other	5	5%
Nothing	4	3%
Don't know	6	5%
Base: All who rent and do not expect to buy their own home in the next 5 years (99)		

There are perhaps no surprises here, with these respondents mainly making comments about high house prices and difficulties getting the right amount of finance together, a situation that applies to many people across the UK.

Additionally, all respondents were asked if they knew anybody, such as family or friends, who had had to move out of the York area and commute back in for work or studying or another reason and who would actually prefer to live in York if they could. Responses were as follows;

Figure 12. Know someone who has had to move out of York and commute back in



In total, a third (34%) said they did know someone who was in this situation.

The main reasons given as to why respondents felt these people had to move out of York were as follows;

Figure 13. Main reasons why people have had to move out of York

Q7. Why do you think these people have had to move out of the York area?	n	%
Too expensive to buy a home	200	74%
Too expensive to rent a home	116	43%
The right types of homes are not available	27	10%
Better value for money elsewhere (did not specify buying or renting)	16	6%
No council/housing association homes available	14	5%
To improve their general quality of life	6	2%
Moved for work related reasons	5	2%
Not enough housing in York	4	1%
To access better schools	3	1%
Other	14	5%
Don't know	2	1%

Base: All who know someone who had to move out of the York area (265)

The comments made here mirror the comments made by respondents who felt they wouldn't be able to buy their own home in the next 5 years. In particular, the affordability of housing is a concern with three-quarters making reference to it being 'too expensive to buy a home' (74%) and two-fifths that it was 'too expensive to rent a home' (43%). Other reasons were given, but it's clear that the perception here is that there are people pushed-out of the York area due to the lack of affordable housing.

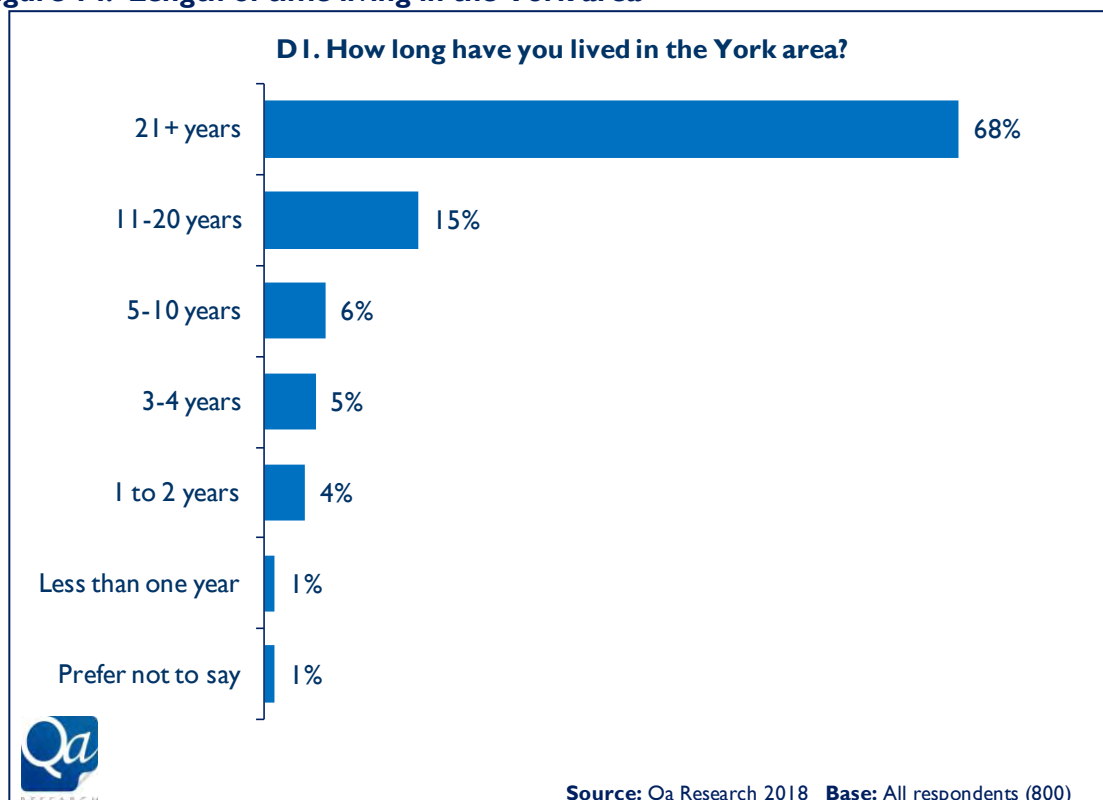
4.3 The Local Housing Situation in York

This section explores residents' views towards the need for new housing in the York area.

4.3.1 Views on building new homes in the York area

Firstly, the chart below outlines the length of time that respondents said they had lived in the York area;

Figure 14. Length of time living in the York area

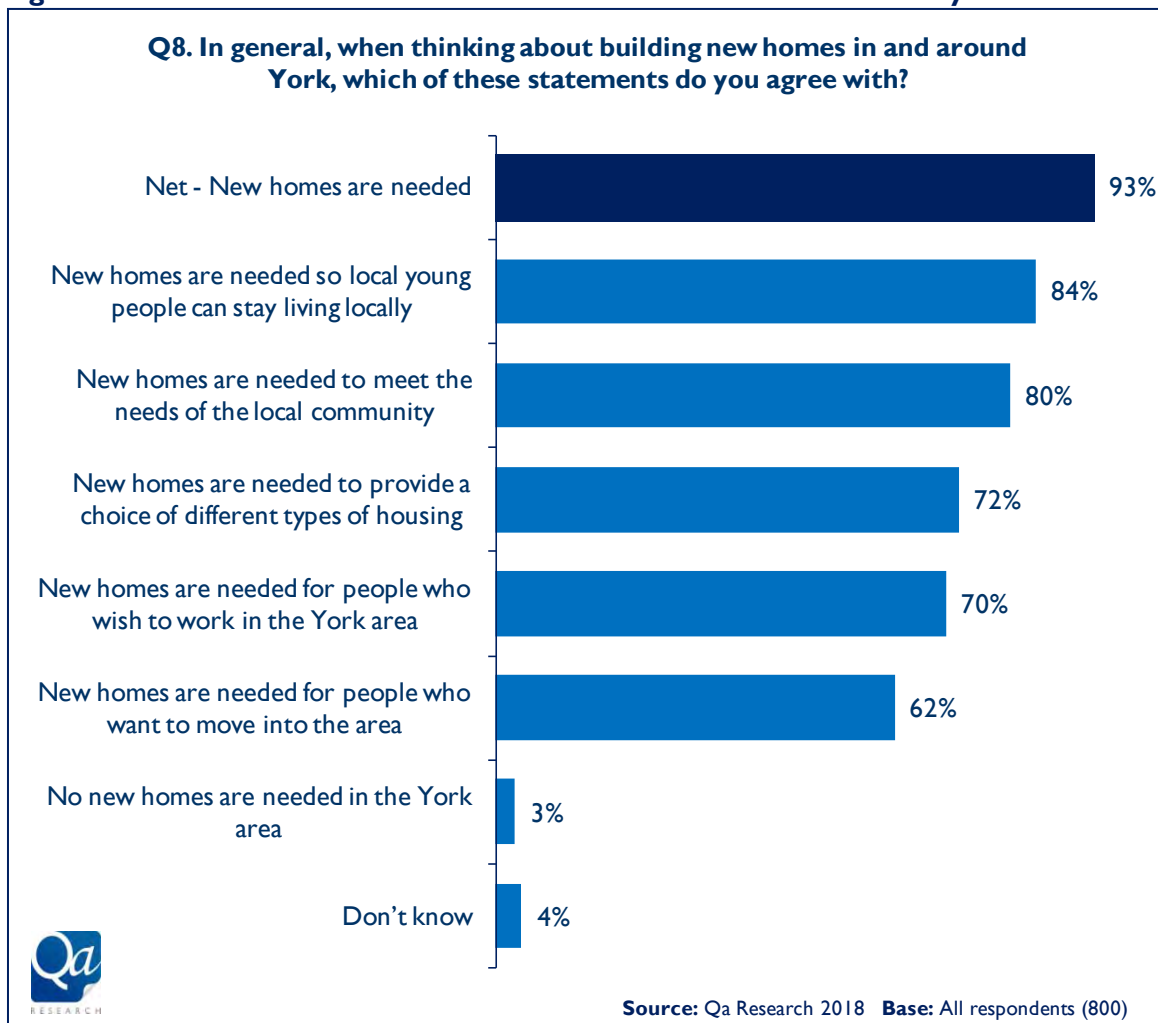


The data above emphasise that most respondents have lived in York for at least 10 years and in many cases significantly longer.

Therefore, it seems likely that many will have an excellent understanding of the City and surrounding area and be able to make a fair assessment of the local housing situation, the needs of the City and its residents and of the location of the proposed Galtres Garden Village development.

All respondents were read a series of statements about the need for new homes in York and asked which they agreed with;

Figure 15. Whether new homes are needed in the York area and why



Only a handful of respondents felt that ‘no new homes are needed’ (3%) and a similar proportion felt that they ‘don’t know’ (4%), but otherwise respondents see a clear need for new homes in and around York – 93% of respondents chose at least one reason from this list.

Primarily, the view was that new homes were needed to support the needs of existing residents particularly so that ‘...local young people can stay living locally’ (84%) and also more generally ‘...to meet the needs of the local community’ (80%).

Less important drivers of the requirement for new homes (but still chosen by the majority of respondents) were the needs of those who may not currently live in the area, such as homes being needed ‘...for people who wish to work in the York area’ (70%) and those who simply ‘...want to move into the area’ (62%).

Finally, almost three-quarters felt that ‘new homes are needed to provide a choice of different types of housing’ (72%).

Respondents were also asked if there were any others reasons why homes were needed. This was an entirely open question and verbatim responses have been 'coded' into themes for analysis and these themes are shown in the table below;

Figure 16. Other reasons why new homes are needed in the York area

Q9. Are there any other reasons why you feel that new homes are needed?		
	n	%
No additional reasons	248	33%
We need more affordable housing	141	19%
We need more housing for young people	59	8%
The number of homes does not match the demand	56	8%
First time buyers struggle to get onto the market	42	6%
The population of York is growing	23	3%
We need more social housing	22	3%
There are too many students taking up space	22	3%
We need more housing suitable for families	16	2%
There are too many homeless people in York	16	2%
More homes would make prices and rents more reason	13	2%
We need a good mix of housing	12	2%
We need more housing suitable for the elderly	11	2%
Outsiders or foreigners are taking up space	7	1%
We need more housing suited to disabled people	5	1%
York has Brownfield land available to build on	5	1%
Other	52	7%
Don't know	3	<1%
No comment	77	10%
Base: All who believe that new homes are needed in the York area - valid responses (745)		

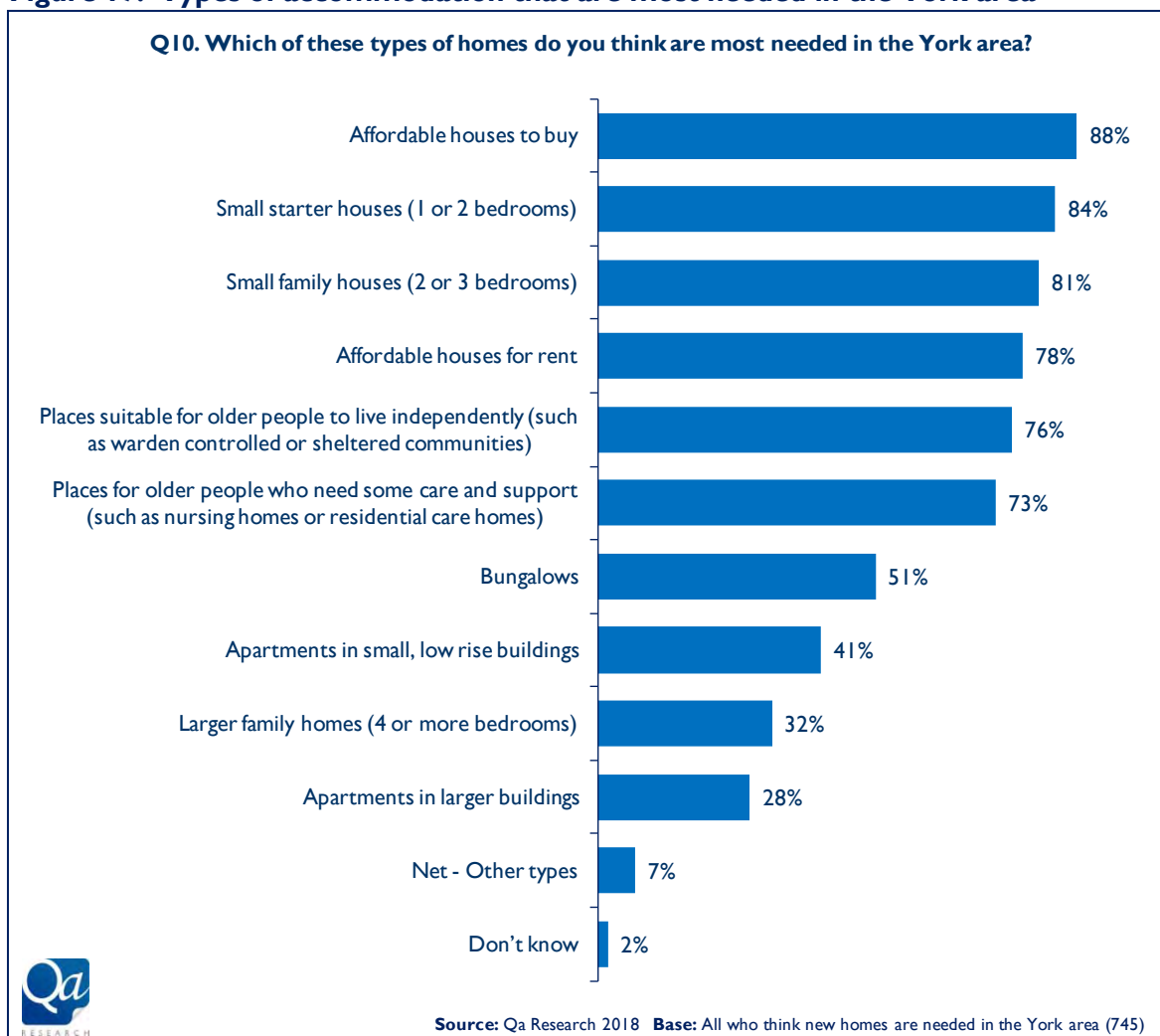
Many respondents couldn't add additional reasons as to why new homes are needed.

Where an answer was provided, these mainly aligned with the statements asked about in the previous question, covering a general need for '*...more affordable housing*' (19%), '*...more housing for young people*' (8%) because '*first time buyers struggle to get onto the market*' (6%) and that the '*number of homes does not match the demand*' (8%).

4.3.2 Types of homes would like to see built in the York area

All respondents who felt that new homes were needed were read a list of types of accommodation and asked which they felt were most needed and responses were as follows;

Figure 17. Types of accommodation that are most needed in the York area



Here, affordability features heavily with a desire for affordable homes ‘to buy’ (88%), but also ‘to rent’ (78%).

In line with this, the most frequently selected property types were smaller homes. Either as ‘starter houses’ (84%) or slightly bigger ‘family houses (2 or 3 bedrooms)’ (81%).

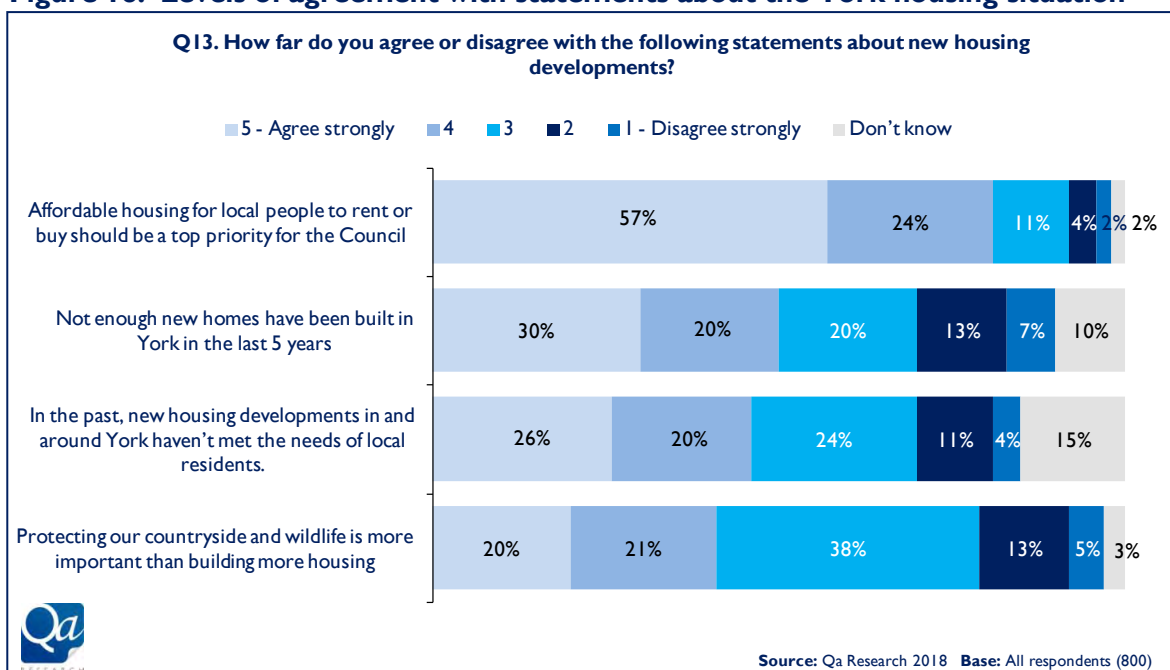
Although ‘bungalows’ were only selected by half (51%), the needs of older people are clearly important to respondents with around three-quarters selecting ‘places suitable for older people to live independently (such as warden controlled or sheltered communities)’ (76%) and ‘places for older people who need some care and support (such as nursing homes or residential care homes)’ (73%).

The findings above also highlight that respondents feel there is much less of a need for certain types of accommodation, including ‘apartments in larger buildings’ (28%) and also ‘apartments in small, low rise buildings’ (41%) but equally ‘larger family homes’ (32%).

4.3.3 Views on the housing situation in the York area

All respondents were read 4 statements about the housing situation in York and asked how far they agreed or disagreed with each one (by giving a score on a 5 point scale) and responses were as follows;

Figure 18. Levels of agreement with statements about the York housing situation



Agreement with these statements is considered to be the proportion giving a score of 4 or 5 out of 5. Disagreement is the proportion giving a score of 1 or 2.

There was only one of these statements that the majority of respondents indicated that they 'agree' with and that was that 'affordable housing for local people to rent or buy should be a top priority for the Council' (81%) – in fact, the majority gave the highest possible score for this of 5 out of 5 (57%). That said, one-in-twenty indicated that they 'disagree' (5%), so it's evident that there are some residents who would prefer the council's focus to be on something else.

Broadly similar levels of agreement were recorded for the other statements, with half agreeing that 'not enough new homes have been built in York in the last 5 years' (50%) – however, this is something one-in-five 'disagree' with (20%).

Respondents were more likely to 'agree' than 'disagree' that 'in the past, new housing developments in and around York haven't met the needs of local residents' (46% vs. 15%), although 24% gave the middle score of 3 out of 5 while a further 15% said that they 'don't know', suggesting that this was one of the harder statements for some respondents to give an assessment on.

Respondents were also more likely to 'agree' than 'disagree' that 'protecting our countryside and wildlife is more important than building more housing' (41% vs. 18%). Of the statements presented here, it is this one that respondents felt most undecided about with almost two-fifths giving the middle score on the scale (38% gave a score of 3 out of 5).

4.4 The Galtres Garden Village Development

This section outlines findings to the section of questions relating to the proposed Galtres Garden Village Development.

4.4.1 Awareness of the proposed development

Respondents were read a brief description of the development which focussed on its location, as follows;

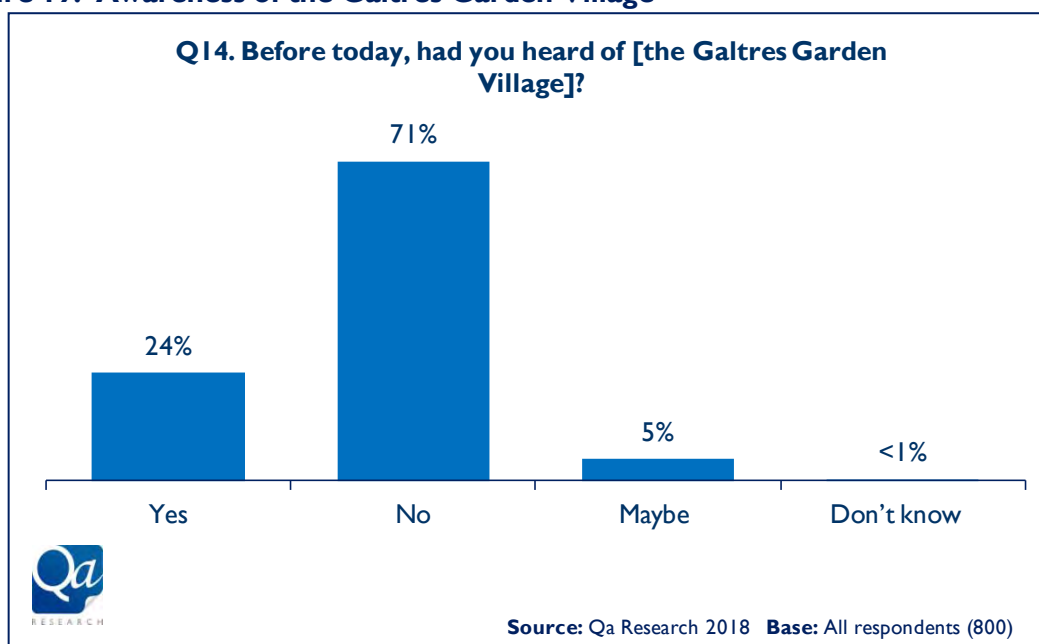
The scheme isn't in the draft Local Plan for York at the moment, but the company is hoping that the council will include it.

The Galtres Garden Village scheme would be located on farmland to the North of York. The site is north of North Lane and near Monk's Cross in an area between the A64 and the A1237 (the ring road).

The proposed development would include over 500 affordable homes as well as homes for the elderly including bungalows, a care village for retirement living and other amenities such as a primary school and shops. In total, over 1,700 new homes would be built.

Then, all were asked if they had heard of the development before being interviewed and responses were as follows;

Figure 19. Awareness of the Galtres Garden Village



One-in-four (24%) said they had heard of this development, based purely on the description above, so it's evident that the proposed development has achieved some degree of cut-through with residents of the City of York Council area.

Additionally, a further one-in-twenty answered 'maybe' (5%) suggesting that awareness could be higher.

As would be expected, some differences in awareness were recorded and these are summarised below;

- **Wards¹** – awareness was highest amongst respondents living in Strensall (58%), Huntington & New Earswick (58%) and Haxby & Wigginton (41%).
- **Age** – awareness increased with age (Age 16-34: 15%, Age 35-64: 24%, Age 65+: 37%).
- **Gender** – males were significantly more likely than females to be aware of the proposed development (28% vs. 20%).

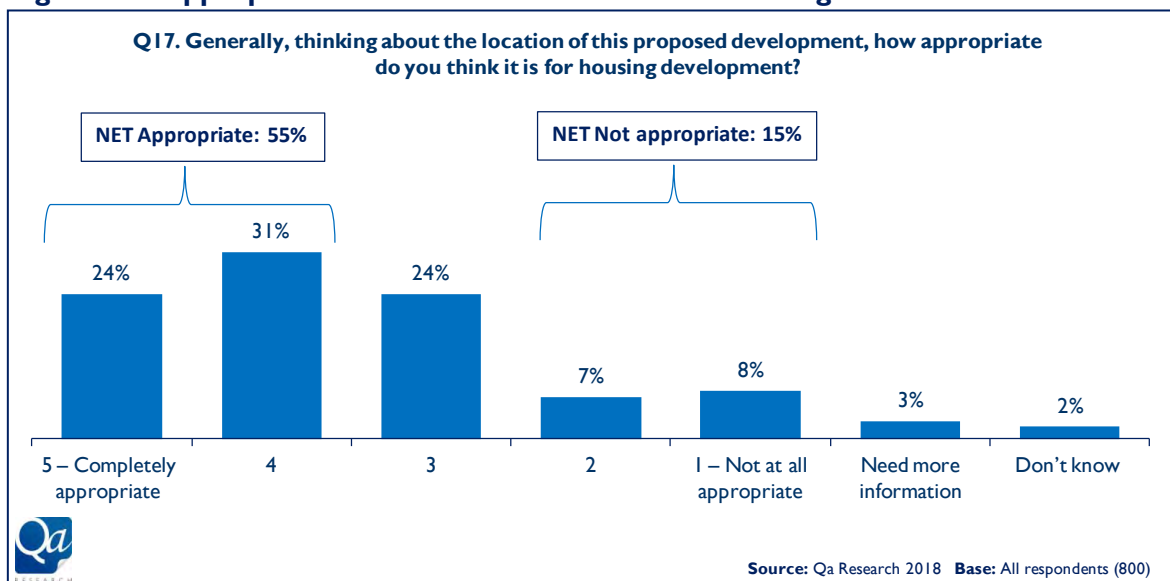
Respondents who said they were aware of the GGV before the interview were asked if they were familiar with the location of the proposed development and 96% said that they were.

4.4.2 Whether the location of the proposed GGV is appropriate

All respondents, regardless of whether they had heard of the GGV or not, were either shown two images that detailed its location or directed to a website which showed the same two images (the images are shown in Appendix I).

Then all respondents were asked how appropriate they thought the location of the proposed Galtres Garden Village was for housing development and responses were as follows;

Figure 20. Appropriateness of the GGV location for housing



The majority of respondents indicated that they felt this was an appropriate location by giving a score of either 4 or 5 out of 5 (55%). Within this, almost a quarter gave the highest score of 5 (24%), indicating that they felt this was a 'completely appropriate' location.

Of the remainder, respondents were most likely to give the middle score on the scale (24% gave a score of 3), suggesting that they feel unable or unwilling to decide how appropriate this location would be for this development. A further one-in-twenty said they either 'need more information' (3%) or they simply 'don't know' (2%).

¹ The number of respondents interviewed in each Ward is relatively low (See Section 4.1) so findings by Ward should be seen as indicative only.

In total, 15% indicated to some degree that they felt this location was not appropriate by giving a score of 1 or 2, with around one-in-ten giving the very lowest score of 1 indicating that they felt this location was *'not at all appropriate'* (8%).

Again, some differences were recorded between different types of respondents and these are summarised below;

- **Ward** - In every ward, respondents were most likely to give a score of 4 or 5 (indicating that they felt the location was *'appropriate'*) than they were to give a score of 1 or 2. The proportion that gave scores of 4 or 5 was highest amongst respondents living in Hull Road (76%), Micklegate (72%) and Clifton (70%).
- **Age** – Younger respondents were significantly more likely than older ones to feel that this was an appropriate location (Age 16-34: 65%, Age 35-64: 52%, Age 65+: 44%) – this proportion increased to 73% amongst those aged 16-24, the highest recorded amongst any age group.
- **Tenure** – most renters are younger residents, so it's no surprise that renters were significantly more likely than owners to feel this is an appropriate location (71% vs. 41%).

Amongst respondents who *'agree'* that *'protecting our countryside and wildlife is more important than building more housing'*, 49% felt this was an *'appropriate'* location for housing development, a higher proportion than thought that it was *'not appropriate'* (21%). This finding suggests that the site appeals to many residents who see conservation as a higher priority than housing.

4.4.3 Aspects of the GGV that residents like and dislike

Respondents were then read a longer description of the GGV and asked what, if any, aspects they liked or disliked, the description was as follows;

The company behind the scheme was put together by local landowners rather than a national housing developer. They propose to work closely with the council to deliver a housing scheme that meets housing needs in York.

The company plans to offer a range of housing options including houses to rent or buy and shared ownership and help-to-buy schemes. They plan to build houses in a range of sizes to meet the needs of different types of residents and not just detached executive homes. Some bungalows and apartment will also be built.

Importantly, around 500 of the 1,700 homes would be affordable homes and there would also be more than 290 retirement homes and a 64-bed care home.

The company is keen to ensure the development creates a community, so the scheme would also include a village green, recreation facilities, a primary school, doctor's surgery and shops.

The table below shows aspects of the developed that respondents said they **liked**. This was an entirely open question and verbatim responses have been 'coded' into themes for analysis, as shown below;

Figure 21. Aspects of the GGV that respondents like

Q19. Based on this description what, if anything, do you like about this proposed development?		
	n	%
Self-contained village community	170	21%
It all sounds good	150	19%
Provides amenities for everyone	99	12%
Primary school	96	12%
Affordable housing	86	11%
Wide range of houses	71	9%
Care home, retirement homes & bungalows for the elderly	69	9%
Doctors surgery	60	7%
Leisure facilities	60	7%
Well planned and balanced development	58	7%
There is a real need for more homes in York	44	6%
Good location due to available land, transport links, proximity to Monks Cross	44	5%
Village Green or Green spaces	38	5%
It all sounds good, but reservations about whether it will really turn out this way	31	4%
Integration of the young with the elderly	23	3%
Boost to the economy (i.e. jobs etc.)	20	2%
Facilities for young people	15	2%
Local landowners working with the Council	14	2%
Similar approach to other successful developments like Acomb, Earswick, JRF etc	12	1%
Other	15	2%
Base: All respondents (800)		

As the previous table demonstrates, respondents readily highlighted aspects of the development that they liked. This included a number of general comments that *‘it all sounds good’* (19%), as well as specific aspects of the proposed development that respondents picked up on.

Most notably, a fifth mentioned the *‘self-contained village community’* which included the following example verbatim comments;

“I like the community idea. Community is better than exclusive housing.”

“I like how it is like they are building a new town with schools and doctors so existing facilities do not get swamped. It is holistic rather than just putting up new houses.”

“Yeah it sounds good, like a little village, if they do what they say they will.”

Both *‘affordable housing’* (11%) and the *‘wide range of houses’* (9%) were also highlighted.

Additionally, specific facilities were mentioned including the *‘primary school’* (12%), *‘care home, retirement homes & bungalows for the elderly’* (9%), the *‘doctors surgery’* (7%) and *‘leisure facilities’* (7%).

Only around 4% of respondents were unable to mention anything that they liked about the proposed development.

The table below shows aspects of the developed that respondents said they **disliked**. Again, this was also an entirely open question and verbatim responses have been *‘coded’* into themes for analysis and these themes are shown in the table below;

Figure 22. Aspects of the GGV that respondents dislike

Q20. Based on this description what, if anything, do you dislike about this proposed development?		
	n	%
Nothing bad to say	259	32%
Size of the development will seriously worsen the existing traffic congestion	118	15%
Current road infrastructure is already saturated, especially around the A64 & ring road	110	14%
Do not use green land; develop available brown land	61	8%
New infrastructure must be put in place first (e.g. dual carriageway on the A1237)	54	7%
Too large a development for such a site; too many houses	48	6%
Distrust of the development and whether it will eventually be how it is described here	36	5%
There is no mention of a dedicated bus route or other essential public transport	32	4%
Ratio of affordable homes is too low	28	4%
Fears that the affordable homes will not actually be affordable	25	3%
Concerns that there will be insufficient amenities to support this number of people	25	3%
Detrimental effects to the environmental (i.e. pollution, farmland, wildlife, flooding etc)	24	3%
Development is too far outside York	16	2%
The mix of housing & ages will not create a community	14	2%
No mention of secondary education provision or strain on hospital services	13	2%
Other	38	5%
No comment	77	10%
Don't know	13	2%
Base: All respondents (800)		

Compared with the proportion that highlighted aspects of the proposed development that they liked, fewer respondents mentioned something that they disliked – a third said they had ‘nothing bad to say’ (32%) while a further one-in-ten made ‘no comment’ (10%).

The main issues flagged by respondents related to transport including that it will ‘...seriously worsen the existing traffic congestion’ (15%) and that ‘current road infrastructure is already saturated, especially around the A64 & ring road’ (14%). As well as this, there were mentions of needing to ensure new infrastructure is in place first (7%) and some of these comments made reference to roads, which others highlighted that the description read to them had ‘no mention of a dedicated bus route or other essential public transport’ (4%)

Aside from transport, 8% of respondents made comments about the use of ‘green land’ rather than ‘brown land’, such as the following examples;

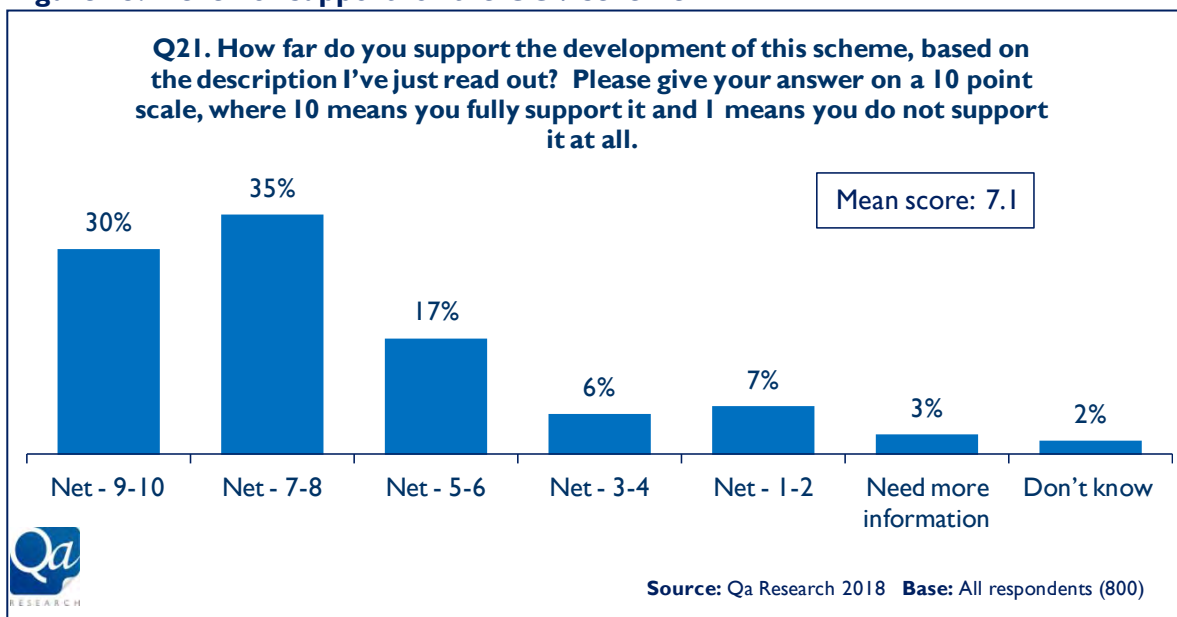
“I’d prefer that such large developments are built on derelict land, not greenbelt land.”

“I would like more brown-field sites to be used. They can build upwards on brown-field sites; apartments. Schools tend to be in situ at brown-field sites, and jobs are already there. In the main, we haven’t exhausted building on brown-field sites yet.”

4.4.4 Level of support for the proposed Galtres Garden Village development

On a ten-point scale, respondents were asked to say how far they supported the development of the scheme and responses were as follows;

Figure 23. Level for support for the GGV scheme



A range of views were recorded here, but with an average (mean) score of 7 out of 10 there is generally support for the development of the scheme.

Almost a third gave the highest scores of 9-10 (30%) indicating strong support for the scheme, while a further third gave scores of 7-8 (35%) which can also be considered as supporting the scheme.

In contrast, the lowest scores of 1-4 were given by 13% of respondents, with around one-in-twenty giving the very lowest scores of 1-2 (7%)

It's notable that most respondents were happy to give an indication of whether they supported the scheme or not, based in most instances only on the description outlined in the survey (as the majority of respondents had not heard of the scheme before the interview). In fact, only around one-in-twenty felt unable or unwilling to give a rating, either saying they '*need more information*' (3%) or simply '*don't know*' (2%).

As would be expected, so differences were recorded in the level of support between different types of respondents and these are summarised below;

- **Ward** – although findings amongst respondents living in different wards should be seen as indicative only, the following are notable;
 - The highest proportions giving a score of 9-10 (indicating strong support) were recorded amongst respondents living in Hull Road (57%), Guildhall (54%), Huntington & New Earswick (40%) and Holgate (39%).
 - The highest proportion giving the lowest scores of 1-4 was recorded amongst respondents living in Strensall (27%).
- **Age** – The highest level of support (a score of 9 or 10) was recorded amongst younger respondents (Age 16-34: 40%, Age 35-64: 25%, Age 65+: 24%). In contrast, older respondents were significantly more likely to give the lowest scores of 1-4 (Age 16-34: 6%, Age 35-64: 16%, Age 65+: 17%).
- **Tenure** – whether someone lives in a home they own (or are buying) or they rent is linked to a large degree to their age, with the majority of renters aged under 35. Therefore, it's perhaps no surprise that support (a score of 9 or 10) for the scheme is significantly higher amongst renters than owners (44% vs. 24%).

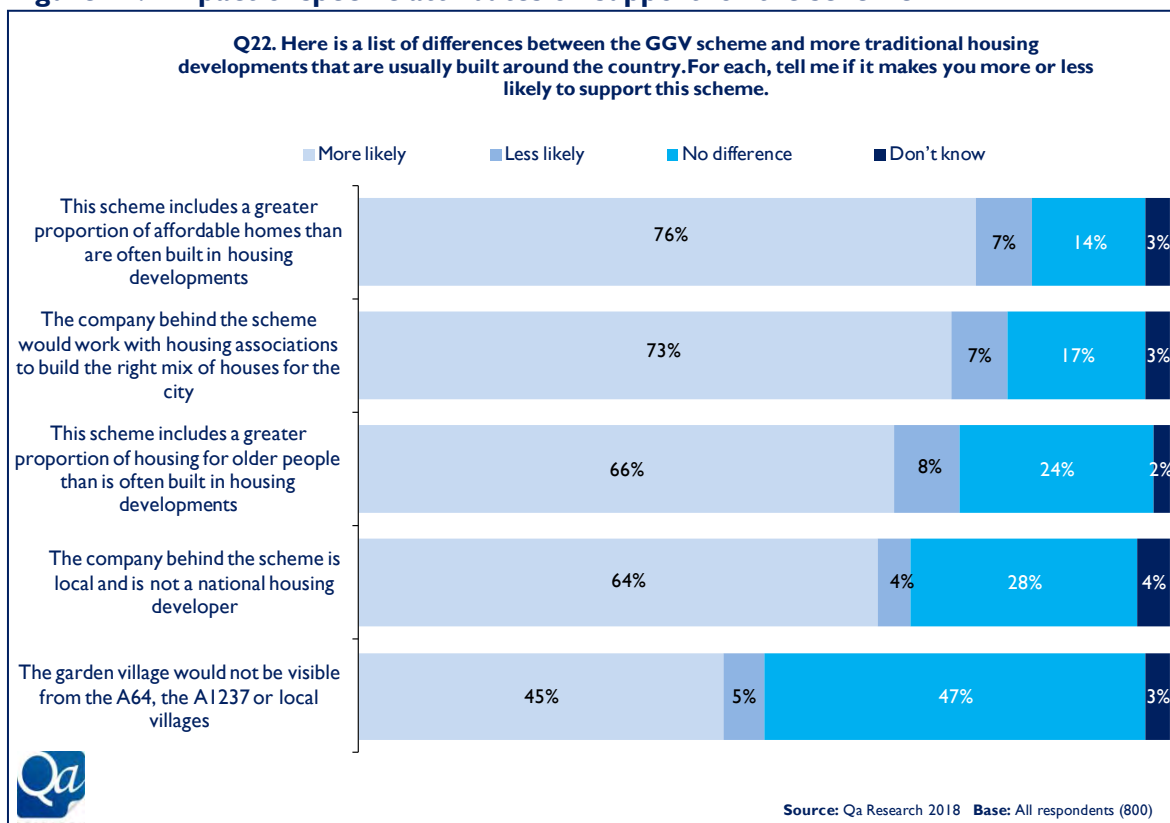
In addition, some differences were recorded based on respondents' attitudes towards development generally and to the location of the proposed GGV development;

- As might be expected, the proportion giving a score of 9-10 was significantly higher amongst those who agree that '*affordable housing for local people to rent or buy should be a top priority for the Council*' than those who disagree (32% vs. 14%) – although it should be noted that less than 50 respondents disagreed with this statement.
- The proportion giving a score of 9 or 10 was also higher amongst those who disagree that '*protecting our countryside and wildlife is more important than building more housing*' compared with those who agree (42% vs. 25%) – of course, this does still mean that one-in-four who agree with this statement expressed the strongest level of support for the development, so it is clearly has some appeal amongst respondents with a strong desire to preserve the countryside.
- In total, 87% of respondents who said that they felt the location of the proposed GGV development was *appropriate* gave a score of 7-10, indicating some degree of support, which is perhaps not unexpected. More notably, almost a fifth (18%) of those who felt the location was *not appropriate* gave a score of 7-10 (4% gave a score of 9-10), so despite concerns over its location some residents will seemingly still support the scheme.

4.4.5 Impact of specific attributes of the GGV on levels of support

A question was included to evaluate specific aspects of the proposed GGV development on residents' likelihood to support or not support it. Five different attributes were read out to respondents and for each one they were asked if it made them more or less likely to support the development or made no difference. Responses were as follows;

Figure 24. Impact of specific attributes on support for the scheme



All the aspects presented to respondents were positive, so it's perhaps no surprise that respondents either viewed these favourably or said they made no difference.

The most appealing aspect from this list would seem to be that when compared with similar schemes the GGV would include '...a greater proportion of affordable homes...', something that three-quarters felt would make them 'more likely' (76%) to support it.

A similar proportion felt 'more likely' to support the scheme because 'the company behind the scheme would work with housing associations to build the right mix of houses for the city' (73%).

The majority of respondents also said that they were 'more likely' to support the scheme because it '...includes a greater proportion of housing for older people...' (66%) and 'the company behind the scheme is local and is not a national housing developer' (64%).

The least impactful aspect of the proposed development, from this list would seem to be the fact that 'the garden village would not be visible from the A64, the A1237 or local villages', something that less than half felt made them 'more likely' to support it (45%).

As outlined in Section 4.4.4, younger respondents (aged under 35) were more likely to support the proposed development (40% gave the top scores of 9 or 10 out of 10), so it seems likely that for many aged 16-34 the aspects asked about at this question can only have a limited impact in making them *'more likely'* to support the scheme (essentially they fully support it already).

It's perhaps for this reason that older respondents more readily said that these aspects of the proposed development made them *'more likely'* to support it and this was true of the following;

- *'This scheme includes a greater proportion of affordable homes than are often built in housing developments'* (Age 16-34: 69%, Age 35-64: 79%, Age 65+: 82%)
- *'The company behind the scheme would work with housing associations to build the right mix of houses for the city'* (Age 16-34: 64%, Age 35-64: 77%, Age 65+: 79%)
- *'This scheme includes a greater proportion of housing for older people than is often built in housing developments'* (Age 16-34: 55%, Age 35-64: 72%, Age 65+: 70%)
- *'The garden village would not be visible from the A64, the A1237 or local villages'* (Age 16-34: 35%, Age 35-64: 50%, Age 65+: 53%).

It's also notable that almost two-fifths of respondents who felt that the location of the proposed development was not appropriate said the fact that *'the garden village would not be visible from the A64, the A1237 or local villages'* made them *'more likely'* to support it.

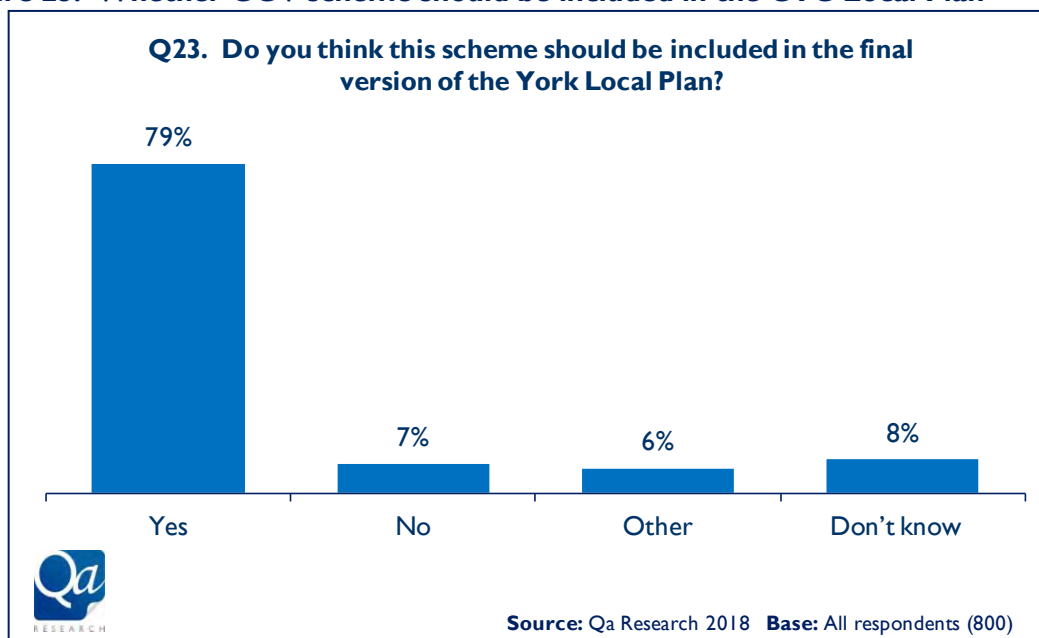
Finally, by looking at responses amongst respondents who gave lower scores out of 10 when asked how far they would support the GGV development we can understand which of these aspects has most impact on driving support. So, taking respondents who gave a score of 1-6, the highest proportion said *'more likely'* for the following;

- *'This scheme includes a greater proportion of affordable homes than are often built in housing developments'* – 64% said this made them *'more likely'* to support it
- *'The company behind the scheme would work with housing associations to build the right mix of houses for the city'* – 63% said this made them *'more likely'* to support it
- *'This scheme includes a greater proportion of housing for older people than is often built in housing developments'* – 57% said this made them *'more likely'* to support it.

4.4.6 Whether the GGV should be in the CYC Local Plan

Finally, a question was included which simply asked whether respondents felt that the GGV scheme 'should be included in the final version of the York Local Plan' and responses were as follows;

Figure 25. Whether GGV scheme should be included in the CYC Local Plan



Responses to this question were overwhelmingly in favour of including the scheme in the CYC Local Plan, with eight-in-ten responding 'yes' (79%).

Only around one-in-twenty gave a very clear 'no' (7%) here, with most of those who didn't say 'yes' either saying they 'don't know' (8%) or giving an 'other answer' (6%). The types of other answers given included comments about not being able to give an answer 'without more information' (2%) or about it depending on 'road infrastructure issues being addressed' (1%).

With such high levels of support, few differences between sub-groups were recorded.

The most notable is the clear and statistically significant difference between respondents who view the location as being 'appropriate' compared with those who felt it was 'not appropriate' - 90% of those who felt it was 'appropriate' said it should be included in the CYC Local Plan, compared with 47% of those who thought it was 'not appropriate'.

However, one point to note is that respondents who thought it was 'not appropriate' were more likely to answer 'yes' than 'no' here (47% vs. 35%) and although this difference is not statistically significant, it does suggest that many who have concerns about the location would still support its inclusion in the CYC Local Plan.

5. Key Findings - Commuters

This section outlines findings amongst the sample of 83 commuters interviewed using a separate, but similar questionnaire to that used for York residents. Commuters were defined as people who don't live in the CYC area but commute in for work or study and would like to live there if they could.

5.1 Sample Profile

No quotas were set on recruitment of this group and all demographic characteristics were left to fall out naturally. The profile of the commuters sample is shown below;

Figure 26. Demographic profile of respondents (commuters)

	All commuters	
	<i>n</i>	%
Age		
NET: 16-34	41	49%
NET: 35-64	42	51%
NET: 65+	-	-
Total	83	
Gender		
Male	45	56%
Female	38	64%
Total	83	

All respondents interviewed as part of this sample were aged under 65, with sample split broadly equally between those aged 16-34 (49%) and those aged 35-64 (51%).

Similarly, the sample is split equally between males and females.

5.2 Commuters Current Living Arrangements

The commuters sample contained a mix of people who had never lived in York and others that had. Of the 83 commuters interviewed, 26 (almost a third – 31%) said that they used to live in York.

These respondents were asked to outline how frequently they visited York for work or study and also for other reasons and responses are summarised below;

Figure 27. Frequency of visiting York (commuters)

Frequency of visiting York	All commuters	
	n	%
Number of days a week commute to York for work or study		
7 days	4	5%
6 days	3	4%
5 days	29	35%
4 days	12	14%
3 days	15	18%
2 days	12	14%
1 day	4	5%
It depends	4	5%
Frequency of visiting for other reasons		
At least once a week	32	39%
Once a fortnight	22	27%
Once a month	17	20%
Once every 2-3 months	4	5%
Less often	7	8%
Don't know	1	1%
Base: All commuters (83)		

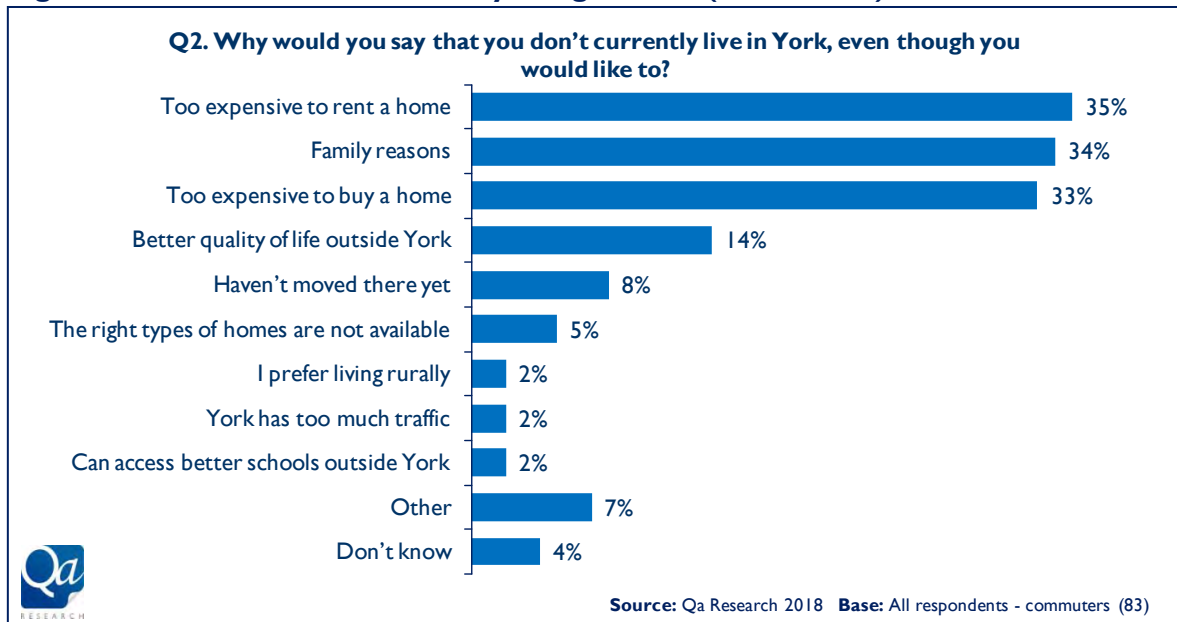
The table above simply confirms that this is a sample of people who commute into the York area, with more than half (58%) indicating that they travel in for work or study on at least 4 days a week.

It's evident from the data above that these respondents choose to access York for other reasons as well, apart from working and studying, with 65% responding that they do so 'once a fortnight' or 'at least once a week' (39%).

Based on these findings we can be confident that this is a sample of commuters.

All commuters were asked why they don't currently live in York and responses were as follows;

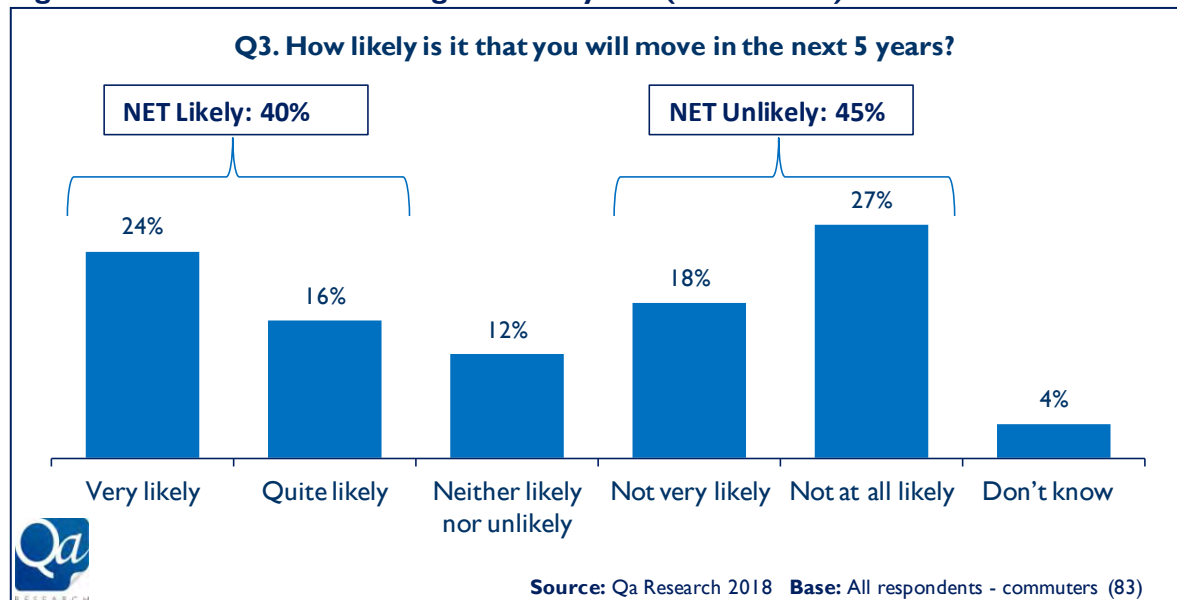
Figure 28. Reasons for not currently living in York (commuters)



A mix of reasons were given here and some commuters are clearly happy not to live in York, but notably a third mentioned that it's 'too expensive to rent a home' (35%) and a similar proportion felt that it was 'too expensive to buy a home' (33%).

Commuters' likelihood to move in the next 5 years was as follows;

Figure 29. Likelihood of moving in next 5 years (commuters)



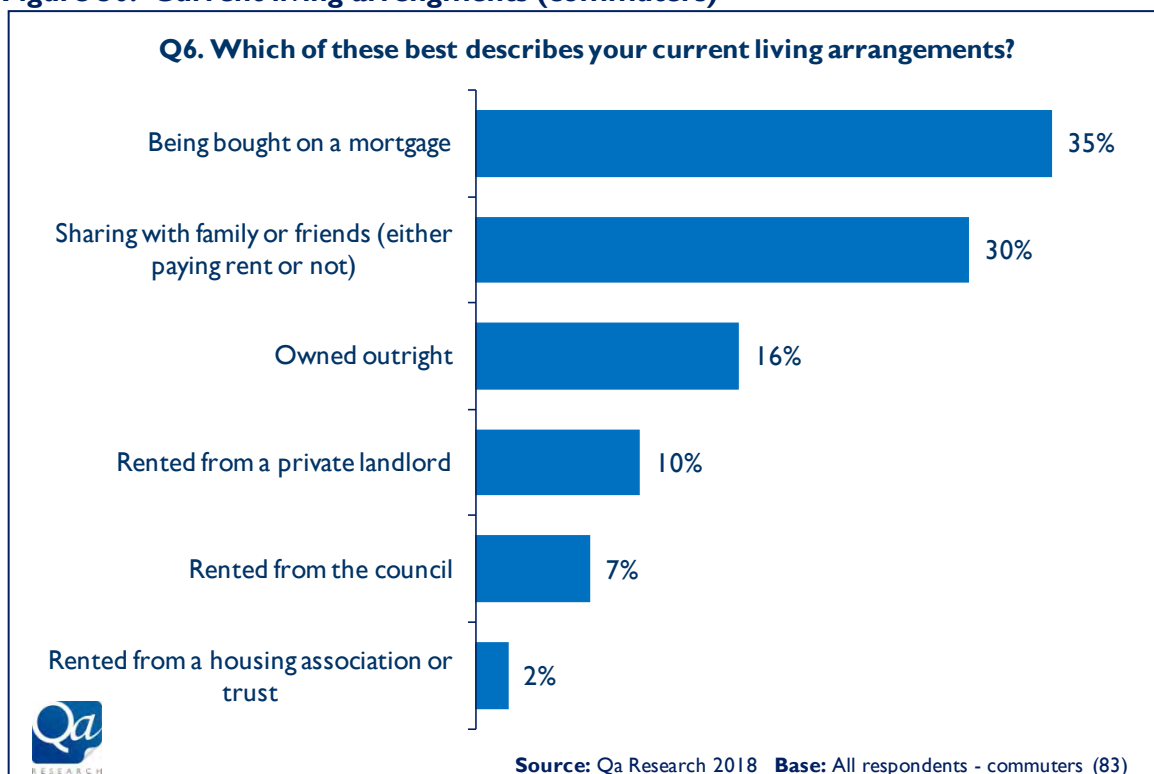
Responses were polarised here; two-fifths (40%) felt this was at least 'quite likely', while a similar proportion (45%) considered that it was 'not very' or 'not at all likely' that they would move.

Amongst the two-fifths of respondents who felt it was likely that they would move in the next 5 years, 24% (equating to 8 respondents) thought they would move to York.

Amongst those who didn't think they'd move to York, one-in-four (equating to 3 respondents) said that this was because York is 'too expensive', but mostly respondents said this was because they expected to move to a different location (e.g. London).

The chart below outlines the currently living arrangements of commuters;

Figure 30. Current living arrangements (commuters)



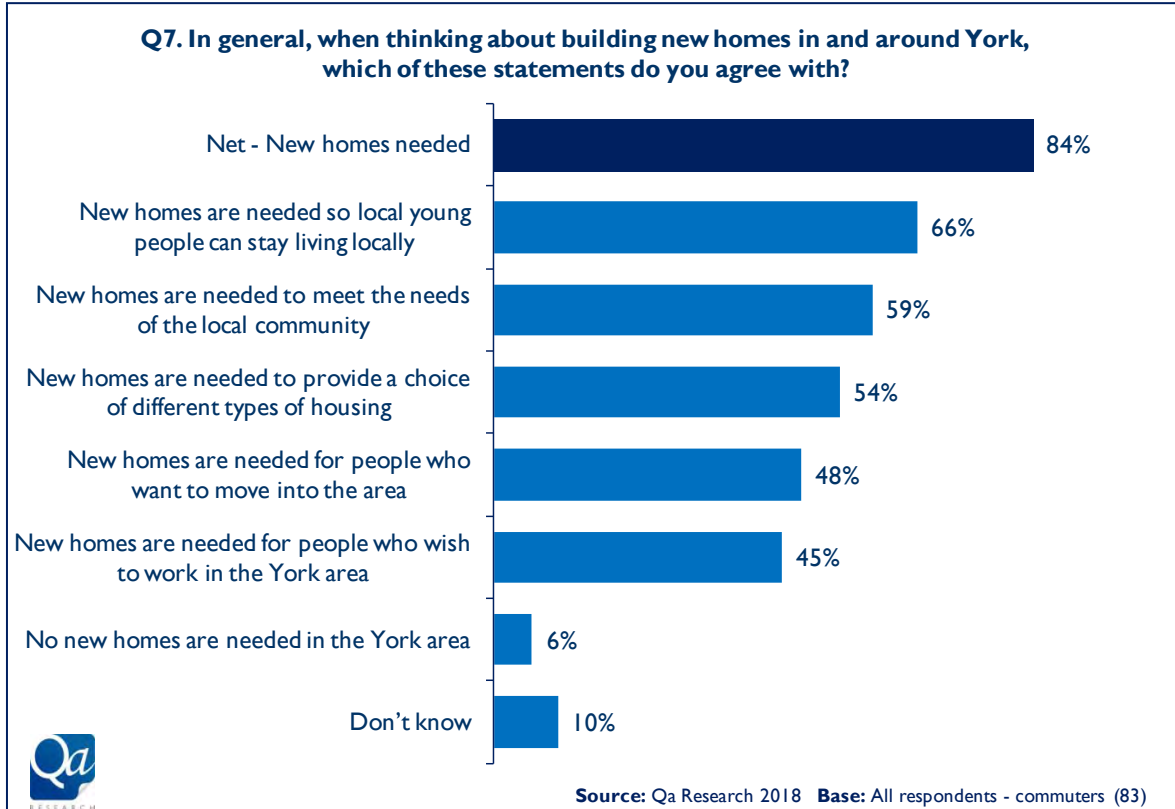
In line with earlier findings which suggested that many commuters live outside York for 'family reasons', the living arrangements noted here suggest that many of these commuters are settled outside York having purchased homes; a third are buying 'on a mortgage' (35%), while 16% actual 'own outright'.

However, many of these commuters have more fluid living arrangements, with a third 'sharing with family or friends (either paying rent or not)' (30%) and most of the rest renting, from a 'private landlord' (10%) or 'the council' (7%).

5.3 The Local Housing Situation in York (Commuters)

All respondents were read a series of statements about the need for new homes in York and asked which they agreed with;

Figure 31. Whether new homes are needed in the York area and why (commuters)



There is a clear feeling amongst the commuters sample that York requires new homes, with 84% selecting at least one reason why they felt this was the case.

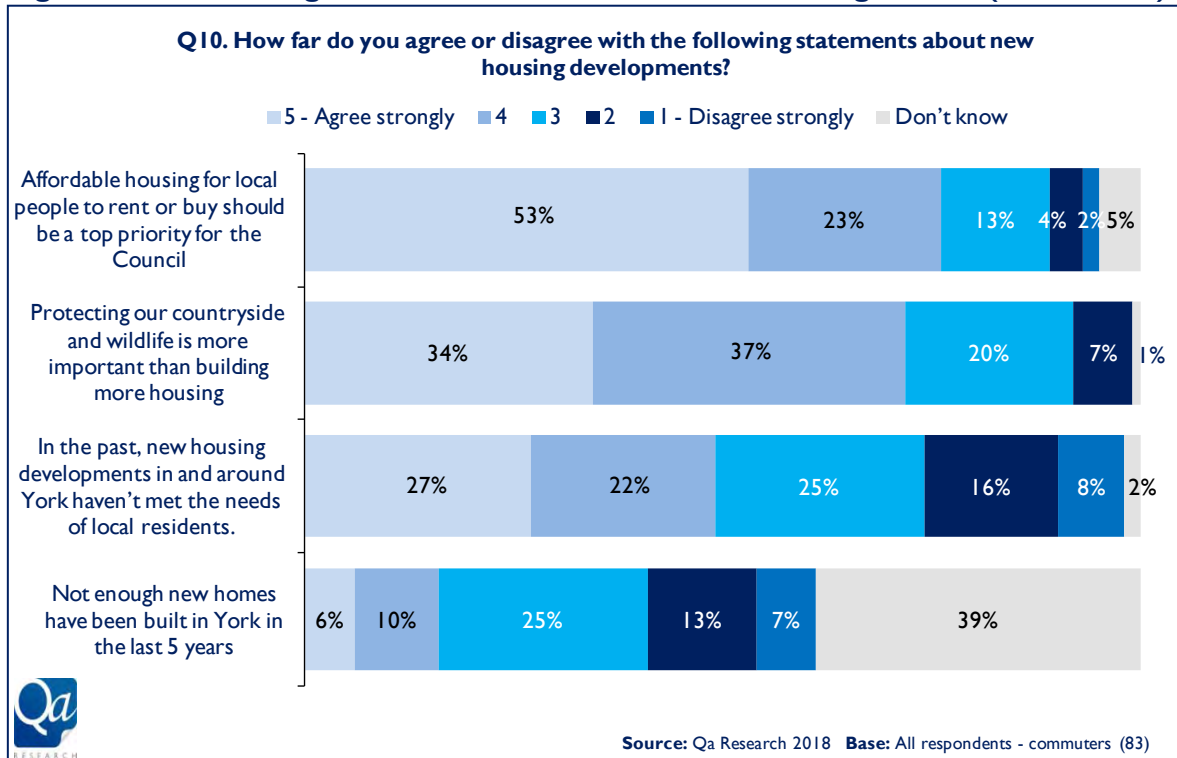
Despite not currently living in York, this group most frequently said that new homes were needed ‘...so local young people can stay living locally’ (66%) and ‘...to meet the needs of the local community’ (59%) and were slightly less inclined to say they were needed ‘...for people who want to move into the area’ (48%) and ‘...for people who wish to work in the York area’ (45%).

One-in-ten felt unable to give an opinion on this and simply answered ‘don’t know’ (10%), while one-in-twenty felt that ‘no new homes are needed in the York area’ (6%).

When asked if there were any others reasons why new homes were needed in York, the most frequently given comments related to the fact that York generally needs more ‘affordable housing’ (11 respondents said this), that the ‘population is growing’ (4 respondents said this) and also that ‘the number of homes does not match the demand’ (4 respondents said this) and that there was a need for ‘more housing for young people’ (4 respondents said this).

All respondents were asked how far they agreed or disagreed with a series of statements about the housing situation, by giving their answer on a 5 point scale. Responses were as follows;

Figure 32. Levels of agreement with statements about housing in York (commuters)



The majority of commuters agreed (by giving a score of 4 or 5 out of 5) that ‘*affordable housing for local people to rent or buy should be a top priority for the Council*’ (76%) – this is a very similar proportion that recorded amongst York residents (81%), clearly suggesting that there is a widely held belief that council should focus on delivering affordable housing.

The majority of commuters also agreed that ‘*protecting our countryside and wildlife is more important than building more housing*’ (71%), a higher proportion than that recorded amongst York residents and suggesting that this is more of a consideration for people living outside of the city,

Commuters were more likely to agree than disagree that ‘*in the past, new housing developments in and around York haven’t met the needs of local residents*’ (48% vs. 24%).

However, two-fifths felt unable to say whether ‘*not enough new homes have been built in York in the last 5 years*’ and answered that they ‘*don’t know*’ (39%), while a further one-in-four gave the middle score of 3 out of 5 (25%). Otherwise, responses for this statement were equally split between those who agreed and disagreed (16% vs. 20%).

5.4 The Galtres Garden Village Development

All commuter respondents were asked the same section of questions relating to the proposed Galtres Garden Village Development that was included in the main survey amongst York residents and responses are detailed in this section.

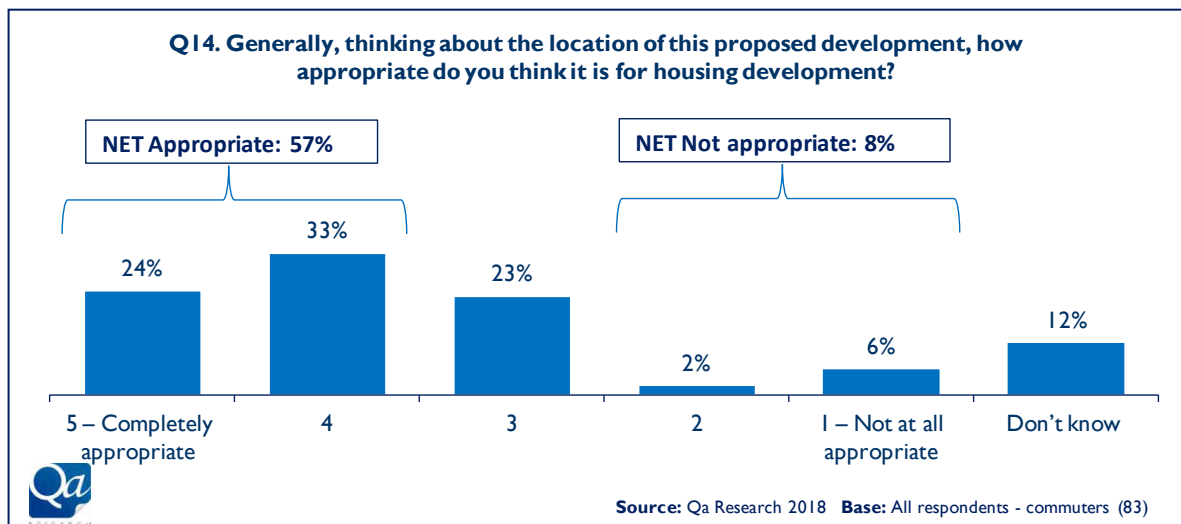
5.4.1 Awareness and appropriateness of the proposed development

The same description outlined in Section 4.4.1 was read to respondents and all were asked if they were aware of the development. In total, one-in-twenty (5%) said they had heard of it and all of these said they were familiar with its location.

To provide context, all commuters were shown the 2 maps included in the Appendices which outline the location. They were then asked if they felt they understood where the development would be located. Almost nine-in-ten (88%) said that they felt they did know.

Respondents were then asked how appropriate they felt the location of the proposed development was and responses were as follows;

Figure 33. Appropriateness of the GGV location for housing (commuters)



Just over half indicated that they felt this was an 'appropriate' location by giving a score of 4 or 5 out of 5 (57%), with one-in-four giving the highest score, indicating that they felt it was 'completely appropriate' (24%).

In contrast, less than one-in-ten gave the lowest scores of 1 or 2 (8%), but within this 6% gave the very lowest score indicating that they felt it was 'not at all appropriate' (6%).

As might be expected, given that they don't live in York and most of these commuters never have done, around a third either gave the middle score on the scale (23%) or said they 'don't know' (12%).

5.4.2 Aspects of the GGV that residents like and dislike

All commuters were read the same description detailed under Section 4.4.3 and asked what, if any aspects of the proposed development they liked and disliked. As with the York residents survey, this was a completely open question and verbatim responses have been ‘coded’ with the over-codes shown below;

Figure 34. Aspects of the GGV that respondents like (commuters)

Q15. Based on this description what, if anything, do you like about this proposed development?		
	n	%
Self-contained village community	20	24%
Well planned and balanced development	14	17%
Affordable housing	14	17%
Good location due to available land, transport links, proximity to Monks cross	10	12%
Primary school	9	11%
Leisure facilities	6	7%
There is a real need for more homes in York	5	6%
Provides amenities for needs of everyone	4	5%
Similar approach to other successful developments like Acomb, Earswick, JRF etc	3	4%
Wide range of houses	3	4%
Facilities for young people	2	2%
Care home, retirement homes & bungalows for the elderly	2	2%
Doctors surgery	2	2%
Local landowners working with the Council	2	2%
No good comments	2	2%
Integration of the young with the elderly	1	1%
No comment	12	14%
Base: All respondents - commuters (83)		

Commuters readily felt able to identify aspects of the proposed development that they liked and only around one-in-seven either made ‘no comment’ or made ‘no good comments’.

Comments mainly focussed on the ‘self-contained village community’ (24%) aspect and that it is a ‘well planned and balanced development’ (17%) which included the following example verbatim comments;

“That it's coordinated with the council and it's integrated.”

“It seems most essentials are covered in this scheme.”

Other comments related to the ‘affordable housing’ (17%) and that it’s a ‘good location due to available land, transport links, proximity to Monks cross’ (12%).

Aspects of the proposed development that respondents dislike are shown below;

Figure 35. Aspects of the GGV that respondents dislike (commuters)

Q16. Based on this description what, if anything, do you dislike about this proposed development?	n	%
Current road infrastructure is already saturated, especially around the A64 & ring road	10	12%
Nothing bad to say	9	11%
Distrust of the development and whether it will eventually be how it is described here	4	5%
Do not use green land; develop available brown land	4	5%
Size of the development will seriously worsen the existing traffic congestion	4	5%
Development is too far outside York	3	4%
There is no mention of a dedicated bus route or other essential public transport	3	4%
The mix of housing & ages will not create a community	1	1%
Too large a development for such a site; too many houses	1	1%
New infrastructure must be put in place first (e.g. dual carriageway on the A1237)	1	1%
Fears that the affordable homes will not actually be affordable	1	1%
Other	3	4%
Don't know	2	2%
No comment	41	49%
Base: All respondents - commuters (83)		

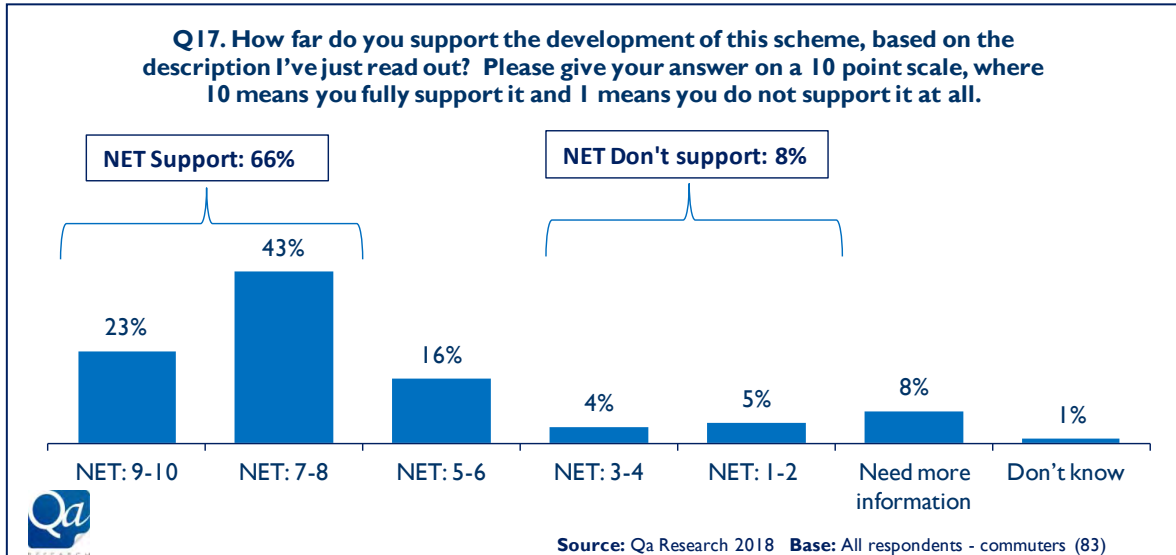
Commuters were less inclined to highlight aspects of the proposed development that they disliked, with half making 'no comment' (49%) and 11% said they had 'nothing bad to say'.

Where comments were made, these covered a range of aspects and no single issue dominated. This included concerns that the 'current road infrastructure is already saturated...' (12%), 'distrust of the development and whether it will eventually be how it is described here' (5%) and calls to '...not use green land; develop available brown land' (5%).

5.4.3 Level of support for the GGV scheme

On a ten-point scale, commuters were asked to say how far they supported the development of the scheme and responses were as follows;

Figure 36. Level of Support for the GGV scheme (commuters)



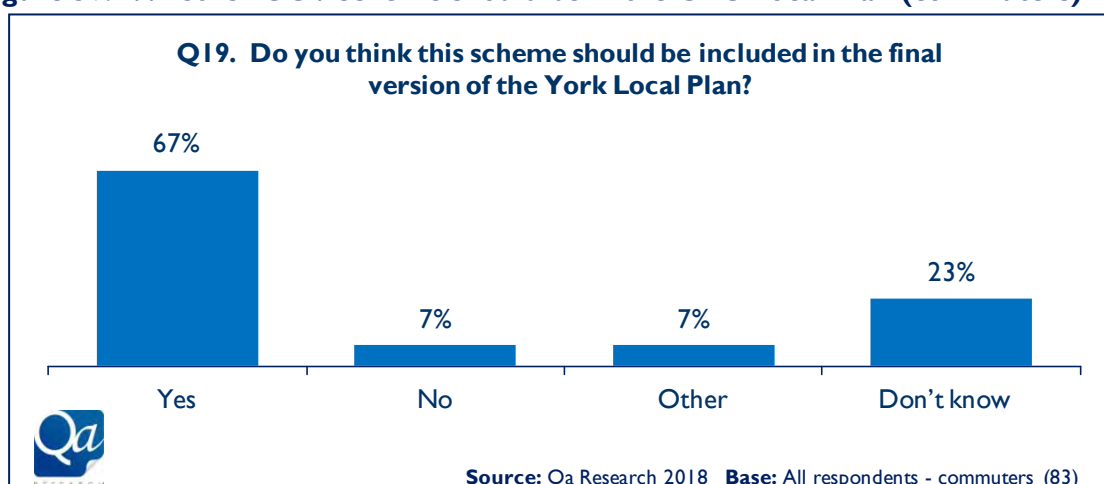
Responses here highlight that there is generally support for the scheme amongst commuters.

In total, two-thirds gave a score of 7 or more out of 10 (66%) – within this, almost a quarter gave the highest scores 9 or 10 (23%). In contrast, less than one-in-ten gave a score of 4 or below (8%), indicating that they don't support the scheme.

5.4.4 Whether the GGV should be in the CYC Local Plan

The final question asked of commuters was whether they felt that the GGV scheme 'should be included in the final version of the York Local Plan' and responses were as follows;

Figure 37. Whether GGV scheme should be in the CYC Local Plan (commuters)

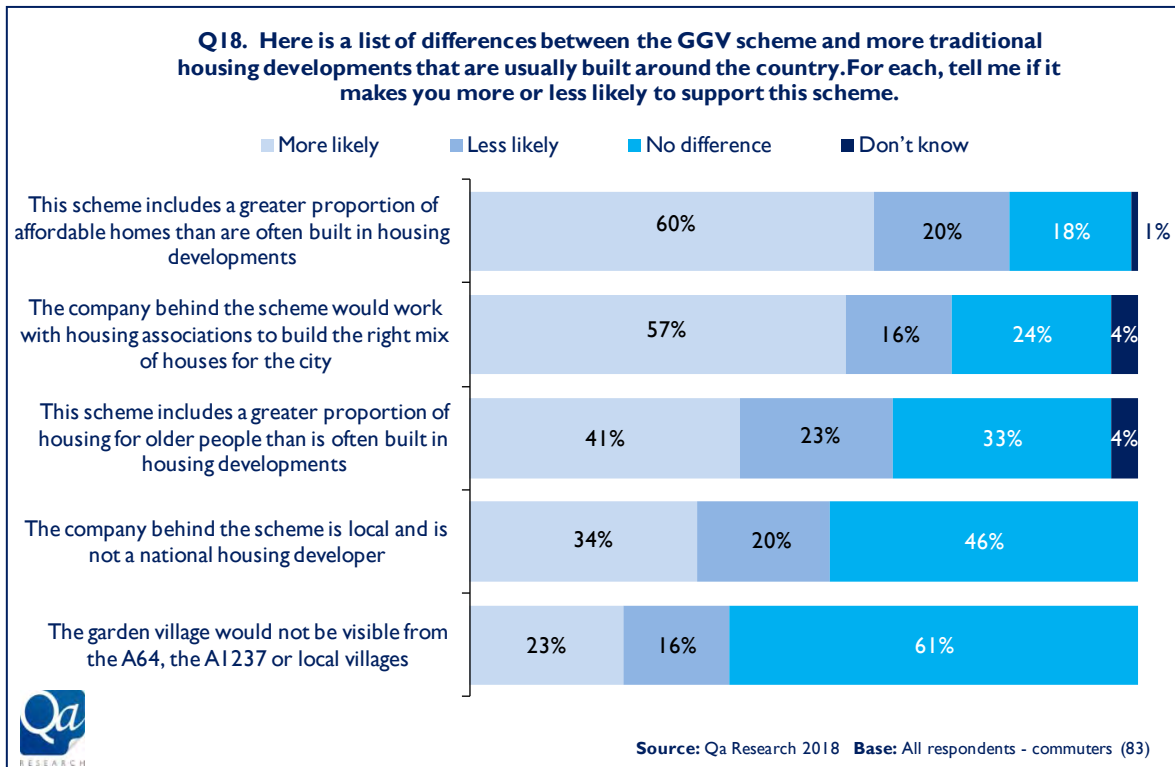


In line with the proportion that indicated they supported the scheme, two-thirds (67%) answered 'yes' here. Only around one-in-twenty gave a firm 'no' response, with most others indicating that they 'don't know' (23%), which isn't perhaps surprising as these respondents live outside York.

5.4.5 Impact of specific attributes on support for the scheme

A question was included to evaluate specific aspects of the proposed GGV development on commuters' likelihood to support or not support it. Five different attributes were read out to respondents and for each one they were asked if it made them more or less likely to support the development or made no difference. Responses were as follows;

Figure 38. Impact of specific attributes on support for the scheme (commuters)



The most influential aspects included at this question were that the scheme ‘...includes a greater proportion of affordable homes than are often built in housing developments’ (something that 60% felt made them ‘more likely’ to support it) and that ‘the company behind the scheme would work with housing associations to build the right mix of houses for the city’ (57% said this made them ‘more likely’).

Other aspects were seemingly less likely to drive support and consistently for each aspect, around a fifth actually said it would make them ‘less likely’ to support it – this proportion was highest for the fact that it would include ‘...a greater proportion of housing for older people than is often built in housing developments’ (23%).

6. Conclusions

This research **outlines the views of a representative sample of residents** living the City of York Council area and the findings can therefore be seen as reflecting the views of the population as a whole.

Residents overwhelmingly believe that there is a need for new homes in and around York, mainly to serve the needs of the existing population but also to provide housing for those who wish to move into the area to live or work. In total, eight-in-ten agree that affordable housing should be *'a top priority for the Council'*.

It's also clear that the desire for new housing is driven by a need for affordable housing (both to buy and to rent), particularly smaller houses of 1-3 bedrooms. In contrast, less support exists for apartments and larger houses with 4 or more bedrooms.

Reflecting this, a third of York residents feel that they know someone who has had to move out of York and commute back in, but who would actually prefer to live in and around the City if they could and this situation was felt to be driven by housing being too expensive to buy or rent.

It's evident that the proposed Galtres Garden Village development has gained some awareness amongst York residents, as **one-in-four (24%) indicated that they had heard of the proposal before the interview**. This awareness was mainly driven by older residents and those living in wards near to the proposed GGV site.

It's important to note that this means that **the majority of respondents (the remaining 76%) assessed the proposed development purely on the information contained within the survey**, which included detail of the location (with supporting maps) and descriptions of the types of housing and facilities that the development would be likely to include. For most respondents this detail appears to have been sufficient for them to give their views on the proposed development, as consistently throughout the survey only small proportions said they *'needed more information'* when given the opportunity.

When asked how far they support the scheme, there was generally support, with 30% giving the top scores of 9-10 out of 10 and a further 35% giving scores of 7-8 and an overall mean score of 7.1 out of 10. Younger respondents in particular (aged under 35) offered the strongest support, perhaps reflecting the fact that this age group faces the biggest housing challenges (for example, the majority rent their home).

However, perhaps the most revealing finding in this survey is that **76% would like to see the proposed development included in the City of York Council Local Plan** and only 7% said with certainty that they would not.

This is despite the fact that when asked to consider the planned location, the research recorded **mixed views on how appropriate this was for housing development**. That said, the majority of respondents (55%) indicated that they felt it was *'appropriate'*, a significantly higher proportion than felt it was *'not appropriate'* (15%).

Notably, although the site wasn't universally seen as being suitable for housing development, there is **evidence that some who feel that it isn't appropriate would actually support the GGV nonetheless** and respondents who said it was *'not appropriate'* were actually more like to say they would like to see it included in the CYC Local Plan than not see it in there.

Based on the descriptions included in the survey, **respondents could readily identify aspects of the scheme that they 'liked'** and a range of different things were chosen. Specifically, this included individual amenities such as the primary school, doctor's surgery, care home and leisure facilities as well as the inclusion of affordable housing. However, in a more general way respondents made comments relating to the development and creation of a community and referenced these individual facilities as an integral part of this.

Based on the detail included in the survey, **respondents identified fewer elements that they 'disliked'**, focussing mainly on concerns around traffic and congestion.

7. Appendices

7.1 Questionnaires

7.1.1 York Residents Survey Questionnaire

Good morning/ afternoon/evening my name is ____ and I am calling from Qa Research on behalf of the Galtres Garden Village Development Company, who have asked us to carry out a survey to help them understand the views of York residents towards the local housing situation and new developments in the city.

The survey will take around 12 minutes and the questions cover views on the availability and affordability of housing in York as well as some questions about house building in future and about a possible new development that could be included in the City of York Council Local Plan. All your answers will be anonymous and confidential.

Would now be a good time for you to take part in the survey?

Just to reassure you this interview will be carried out according to the Market Research Society's Code of Conduct. Your answers will be treated in confidence (in accordance with the Data Protection Act 1998) and the findings of this survey will be reported anonymously. If there are any questions that you do not wish to answer, then please let me know. The call may be recorded for quality purposes.

SCREENERS

The first few questions are about you, so we can ensure that we speak to a good cross-section of local residents.

S1. Firstly, could I ask how old you are?

WRITE IN

S2. Gender

Singlecode

Male

Female

S3: May I confirm that your postcode is

Check against database to ensure correct Ward for quotas

SECTION 1: Your circumstances

Firstly, to help us understand people's views we'd like to understand a little about you and about your views on housing in York.

Q1a. Which of these best describes your current living arrangements? Is your home...

READ OUT

Singlecode

Owned outright

Being bought on a mortgage

Rented from the council

Rented from a housing association or trust

Rented from a private landlord

Sharing with family or friends either paying rent or not

Something else (write in)

Don't know



Q1b. Is your home... READ OUT

Singlecode

- A flat or apartment
- A terraced house
- A semi-detached house
- A detached house
- A room in a shared house
- Something else (Write in)
- Don't know

Q1c. Which of the following statements do you agree with most?

READ OUT

Singlecode

- Your current home is ideal for your needs
- Your current home is too small
- Your current home is too big
- Your current home is unsuitable for another reason
- Don't know

Q1d. How likely is it that you will move home in the next 5 years?

READ OUT

Singlecode

- Very likely
- Quite likely
- Neither likely nor unlikely
- Not very likely
- Not at all likely
- Don't know

ASK Q2-Q4b. IF 'Very likely' OR 'Quite likely' AT Q1d, OTHERS GOTO Q6

Q2. Why are you looking to move home? DO NOT READ OUT

Multicode

- Current home is too small
- Current home is too large (downsizing)
- Don't like the area
- Wish to move out of the city centre
- Wish to move into the city centre
- To move to older people's accommodation
- Need to move for work
- Other (write in)
- Don't know

Q3a. Will you be looking to remain within the York area, or do you expect to move away from the city?

Singlecode

- Remain in York area
- Move out of York area
- It depends/not decided
- Something else (write in)
- Don't know

ASK Q3b IF 'Move out of York area' OR 'It depends/not decided' AT Q3a, OTHERS GOTO Q4

Q3b. Why is that?

CODES OPEN

ASK Q4-Q5 IF 'Rented...' OR 'Sharing with family or friends...' at Q1a, OTHERS GOTO Q6

Q4. Do you expect to buy your own home in the next 5 years?

Singlecode

Yes

No

Don't know

ASK Q5 IF 'No' OR 'Don't know' AT Q4, OTHERS GOTO Q6

Q5. Is anything stopping you from buying your own home? DO NOT READ OUT

Singlecode

Don't want to be a home owner

Can't get the deposit together

Can't get a mortgage/large enough mortgage

House prices are too high

Suitable homes are not available

Something else (write in)

Nothing

Don't know

ASK ALL

Q6. Do you know anybody, such as family or friends, who have had to move out of the York area and commute back in for work or studying or another reason and who would actually prefer to live in York if they could?

Singlecode

Yes

No

Don't know

ASK Q7 IF 'Yes' AT Q6

Q7. Why do you think these people have had to move out of the York area? DO NOT READ OUT

Multicode

Too expensive to buy a home

Too expensive to rent a home

No council/housing association homes available

The right types of homes are not available

To access better schools

To improve their general quality of life

Other (write in)

Don't know

ASK ALL

SECTION 2: The local housing situation

Across the country there has been a lot of discussion about building new homes and how many are needed. Each council has to produce a Local Plan which includes details of where new homes will be built over the next 15 years. York Council's Local Plan has yet to be agreed and is only a draft.

Q8. In general, when thinking about building new homes in and around York, which of these statements do you agree with? READ OUT

Multicode

New homes are needed to meet the needs of the local community

New homes are needed so local young people can stay living locally

New homes are needed to provide a choice of different types of housing

New homes are needed for people who want to move into the area

New homes are needed for people who wish to work in the York area



No new homes are needed in the York area
Don't know

ASK Q9-Q10 IF 'New homes are needed...' AT Q8, OTHERS GOTO Q19

Q9. Are there any other reasons why you feel that new homes are needed?

CODES OPEN

Q10. Which of these types of homes do you think are most needed in the York area? READ OUT

Multicode

Apartments in small, low rise buildings

Apartments in larger buildings

Small starter houses (1 or 2 bedrooms)

Small family houses (2 or 3 bedrooms)

Larger family homes (4 or more bedrooms)

Affordable houses to buy

Affordable houses for rent

Bungalows

Places suitable for older people to live independently (such as warden controlled or sheltered communities)

Places for older people who need some care and support (such as nursing homes or residential care homes)

Other types (please write in below)

Don't know

ASK Q11 IF 'No new homes are needed in the York area' AT Q8, OTHERS GOTO Q12

Q12. Why do you feel that new homes are NOT needed?

CODES OPEN

ASK ALL

Q13. How far do you agree or disagree with the following statements about new housing developments? Please give your answer on 5 point scale, where 1 is disagree strongly and 5 is agree strongly. READ OUT

Singlecode

1 - Disagree strongly

2

3

4

5 - Agree strongly

Don't know

LOOP – RANDOMISE ORDER OF ASKING

- Affordable housing for local people to rent or buy should be a top priority for the Council
- Protecting our countryside and wildlife is more important than building more housing
- Not enough new homes have been built in York in the last 5 years
- In the past, new housing developments in and around York haven't met the needs of local residents.

SECTION 3: Galtres Garden Village Development

I'd now like to talk to you about a proposed new development scheme called the Galtres Garden Village. This survey has been commissioned by the company set-up to take this development forward so they can find what York residents think of this proposal.

The scheme isn't in the draft Local Plan for York at the moment, but the company is hoping that the council will include it.



The Galtres Garden Village scheme would be located on farmland to the North of York. The site is north of North Lane and near Monk's Cross in an area between the A64 and the A1237 (the ring road).

The proposed development would include over 500 affordable homes as well as homes for the elderly including bungalows, a care village for retirement living and other amenities such as a primary school and shops. In total, over 1,700 new homes would be built.

Q14. Before today, had you heard of this proposed development?

Singlecode

- Yes
- No
- Maybe
- Don't know

ASK Q15 IF 'Yes' AT Q14, OTHERS GOTO Q16

Q15. Are you familiar with the location of this proposed development?

Singlecode

- Yes
- No
- Don't know

ASK ALL

If you would like to view a map of the proposed development you can visit a dedicated website at <http://galtresgardenvillage.co.uk/consultation.html>

Q16. Do you want to look at the website before I ask you any more questions?

INTERVIEWER (IF REQUIRED): I can call back to complete the interview once you've looked at the website if you would like me to.

Singlecode

- Yes
- No
- Don't know

Q17. Generally, thinking about the location of this proposed development, how appropriate do you think it is for housing development? Please give your answer on a scale of 1 to 5, where 1 is not at all appropriate and 5 is completely appropriate. READ OUT

Singlecode

- 1 – Not at all appropriate
- 2
- 3
- 4
- 5 – Completely appropriate
- Don't know

I'd now like to tell you a little more about the proposed development.

The company behind the scheme was put together by local landowners rather than a national housing developer. They propose to work closely with the council to deliver a housing scheme that meets housing needs in York.

The company plans to offer a range of housing options including houses to rent or buy and shared ownership and help-to-buy schemes. They plan to build houses in a range of sizes to meet the needs of different types of residents and not just detached executive homes. Some bungalows and apartment will also be built.



Importantly, around 500 of the 1,700 homes would be affordable homes and there would also be more than 290 retirement homes and a 64-bed care home. The company is keen to ensure the development creates a community, so the scheme would also include, a village green, recreation facilities, a primary school, doctor's surgery and shops.

Q19. Based on this description what, if anything, do you like about this proposed development?

CODES OPEN

Q20. Based on this description what, if anything, do you dislike about this proposed development?

CODES OPEN

Q21. How far do you support the development of this scheme, based on the description I've just read out? Please give your answer on a 10 point scale, where 10 means you fully support it and 1 means you do not support it at all.

Singlecode

1 – Do not support at all

2

3

4

5

6

7

8

9

10 – Fully support

Need more information (DO NOT READ OUT)

Don't know

Q22. I'm going to read out a list of differences between the Galtres Garden Village scheme and more traditional housing developments that are usually built around the country. For each difference, please tell me if it makes you more or less likely to support this scheme or if it makes no difference.

Singlecode

More likely

Less likely

No difference

Don't know

LOOP – RANDOMISE ORDER OF ASKING

- The company behind the scheme is local and is not a national housing developer
- This scheme includes a greater proportion of affordable homes than are often built in housing developments
- The company behind the scheme would work with housing associations to build the right mix of houses for the city
- The garden village would not be visible from the A64, the A1237 or local villages
- This scheme includes a greater proportion of housing for older people than is often built in housing developments.

Q23. Do you think this scheme should be included in the final version of the York Local Plan?
READ OUT

Singlecode

Yes

No

Other (write in)

Don't know



SECTION 4: About You

Finally, I'd like to ask you a few questions about yourself. These questions help us to see if there are any differences between the views of different people. Please be assured that all information will be kept completely confidential.

D1. How long have you lived in the York area?

Singlecode

- Less than one year
- 1 to 2 years
- 3-4 years
- 5-10 years
- 11-20 years
- 21+ years
- Prefer not to say
- Don't know

D2. Which of these activities best describes what you do? READ OUT

Singlecode

- Employee in full-time job (30 hours plus per week)
- Employee in part-time job (under 30 hours per week)
- Self employed; full or part time
- Wholly retired from work
- On government supported training programme (e.g. Modern Apprentice/ Training for Work)
- Full-time education at school, college or university
- Unemployed and available for work
- Unemployed due to long term illness
- Full-time carer for a disabled person (paid/ unpaid)
- Looking after the home
- Doing something else (Write in)
- Prefer not to say
- Don't know

D3. Including yourself, how many people aged 16 years old or older live in your household?

ENTER NUMBER

- Prefer not to say

D4. How many people aged under 16 live in your household?

ENTER NUMBER

- Prefer not to say

Thank and close

7.1.2 Commuters Survey Questionnaire

Good morning/ afternoon/evening my name is ____ and I am from Qa Research working on behalf of the Galtres Garden Village Development Company, who have asked us to carry out a survey to help them understand the views of people who live near York about the housing situation in York and new developments in the city.

We're looking to speak to people who don't live in York, but do commute there for work or to study. Does that apply to you?

The survey will take around 12 minutes and the questions cover views on the availability and affordability of housing in York as well as some questions about house building in future and about a possible new development that could be included in the City of York Council Local Plan. All your answers will be anonymous and confidential.

Would now be a good time for you to take part in the survey?

Just to reassure you this interview will be carried out according to the Market Research Society's Code of Conduct. Your answers will be treated in confidence (in accordance with the Data Protection Act 1998) and the findings of this survey will be reported anonymously. If there are any questions that you do not wish to answer, then please let me know.

SCREENERS

S1. Where do you currently live?

Outside York (write in location)

In York or City of York Council area – **thank and close**

S2: May I ask what your postcode is?

INTERVIEWER (IF REQUIRED): This will only be used for analysis purposes and to help us understand where people who give particular views actually live.

WRITE IN

S3. On how many days a week do you commute into York either to work or to study?

Singlecode

7 days

6 days

5 days

4 days

3 days

2 days

1 day

Less often (write in)

It depends

Never – **thank and close**

S4. And is that mainly to work or to study or both?

Singlecode

Work

Study

Both

S5. If you could, would you prefer to live in York rather than commute in?

Singlecode

Yes

No – **thank and close**



SECTION I: Your circumstances

To help us understand people's views we'd like to understand a little about you and about your views on housing in York.

Q1. Apart from working and studying, how frequently would you say you go to York for other reasons? READ OUT

Singlecode

- At least once a week
- Once a fortnight
- Once a month
- Once every 2-3 months
- Less often
- Don't know

Q2. Why would you say that you don't currently live in York, even though you would like to? DO NOT READ OUT

Multicode

- Haven't moved there yet
- Too expensive to buy a home
- Too expensive to rent a home
- No council/housing association homes available
- The right types of homes are not available
- Can access better schools outside York
- Better quality of life outside York
- Family reasons
- Other (write in)
- Don't know

Q3. How likely is it that you will move in the next 5 years? READ OUT

Singlecode

- Very likely
- Quite likely
- Neither likely nor unlikely
- Not very likely
- Not at all likely
- Don't know

ASK Q4 IF 'Very likely' OR 'Quite likely' AT Q3, OTHERS GOTO Q5

Q4. Do you think you will move to York?

Singlecode

- Yes
- No
- Don't know

ASK Q5 IF 'No' AT Q4, OTHERS GOTO Q6

Q5. Why not?

WRITE IN

ASK ALL

Q6. Which of these best describes your current living arrangements? Is your home... READ OUT

Singlecode

- Owned outright
- Being bought on a mortgage
- Rented from the council



Rented from a housing association or trust
Rented from a private landlord
Sharing with family or friends either paying rent or not
Something else (write in)
Don't know

SECTION 2: The local housing situation

Across the country there has been a lot of discussion about building new homes and how many are needed. Each council has to produce a Local Plan which includes details of where new homes will be built over the next 15 years. York Council's Local Plan has yet to be agreed and is only a draft.

Q7. In general, when thinking about building new homes in and around York, which of these statements do you agree with? When I say in and around York, I mean the city itself but also villages within a few miles such as Haxby, Copmanthorpe, Dunnington, Wheldrake, Poppleton and others. READ OUT

Multicode

New homes are needed to meet the needs of the local community
New homes are needed so local young people can stay living locally
New homes are needed to provide a choice of different types of housing
New homes are needed for people who want to move into the area
New homes are needed for people who wish to work in the York area
No new homes are needed in the York area
Don't know

ASK Q8-Q9 IF 'New homes are needed...' AT Q7, OTHERS GOTO Q9

Q8. Are there any other reasons why you feel that new homes are needed?

CODES OPEN

ASK Q9 IF 'No new homes are needed' AT Q7, OTHERS GOTO Q10

Q9. Why do you feel that new homes are NOT needed?

CODES OPEN

ASK ALL

Q10. How far do you agree or disagree with the following statements about new housing developments? Please give your answer on 5 point scale, where 1 is disagree strongly and 5 is agree strongly. READ OUT

Singlecode

1 - Disagree strongly
2
3
4
5 - Agree strongly
Don't know

LOOP – RANDOMISE ORDER OF ASKING

- **Affordable housing for local people to rent or buy should be a top priority for York Council**
- **Protecting our countryside and wildlife is more important than building more housing**
- **Not enough new homes have been built in York in the last 5 years**
- **It's not a problem for people to live outside York and commute in to the city work or study.**

SECTION 3: Galtres Garden Village Development

I'd now like to talk to you about a proposed new development scheme called the Galtres Garden Village. This survey has been commissioned by the company set-up to take this development forward so they can find what people think of this proposal.

The scheme isn't in the draft Local Plan for York at the moment, but the company is hoping that the council will include it.

The Galtres Garden Village scheme would be located on farmland to the North of York. The site is north of North Lane and near Monk's Cross in an area between the A64 and the A1237 (the ring road).

The proposed development would include over 500 affordable homes as well as homes for the elderly including bungalows, a care village for retirement living and other amenities such as a primary school and shops. In total, over 1,700 new homes would be built.

Q11. Before today, had you heard of this proposed development?

Singlecode

Yes

No

Maybe

Don't know

ASK Q12 IF 'Yes' AT Q11, OTHERS GOTO Q13

Q12. Are you familiar with the location of this proposed development?

Singlecode

Yes

No

Don't know

ASK ALL

SHOWCARDS MAP A & MAP B

Q13. Please look at these two pictures. Map A shows the location of the proposed Galtres Garden Village on a map of the whole of York. Map B shows the development on a smaller scale map.

Do you feel that you understand where this development would be located?

Singlecode

Yes

No

Don't know

Q14. Generally, thinking about the location of this proposed development, how appropriate do you think it is for housing development? Please give your answer on a scale of 1 to 5, where 1 is not at all appropriate and 5 is completely appropriate. READ OUT

Singlecode

1 – Not at all appropriate

2

3

4

5 – Completely appropriate

Don't know

I'd now like to tell you a little more about the proposed development.



The company behind the scheme was put together by local landowners rather than a national housing developer. They propose to work closely with the council to deliver a housing scheme that meets housing needs in York.

The company plans to offer a range of housing options including houses to rent or buy and shared ownership and help-to-buy schemes. They plan to build houses in a range of sizes to meet the needs of different types of residents and not just detached executive homes. Some bungalows and apartment will also be built.

Importantly, around 500 of the 1,700 homes would be affordable homes and there would also be more than 290 retirement homes and a 64-bed care home.

The company is keen to ensure the development creates a community, so the scheme would also include a village green, recreation facilities, a primary school, doctor's surgery and shops.

Q15. Based on this description what, if anything, do you like about this proposed development?

CODES OPEN

Q16. Based on this description what, if anything, do you dislike about this proposed development?

CODES OPEN

Q17. How far do you support the development of this scheme, based on the description I've just read out? Please give your answer on a 10 point scale, where 10 means you fully support it and 1 means you do not support it at all.

Singlecode

1 – Do not support at all

2

3

4

5

6

7

8

9

10 – Fully support

Need more information (DO NOT READ OUT)

Don't know

Q18. I'm going to read out a list of differences between the Galtres Garden Village scheme and more traditional housing developments that are usually built around the country. For each difference, please tell me if it makes you more or less likely to support this scheme or if it makes no difference.

Singlecode

More likely

Less likely

No difference

Don't know

LOOP – RANDOMISE ORDER OF ASKING

- The company behind the scheme is local and is not a national housing developer
- This scheme includes a greater proportion of affordable homes than are often built in housing developments
- The company behind the scheme would work with housing associations to build the right mix of houses for the city
- The garden village would not be visible from the A64, the A1237 or local villages



RESEARCH

- This scheme includes a greater proportion of housing for older people than is often built in housing developments.

Q19. Do you think this scheme should be included in the final version of the York Local Plan?

READ OUT

Singlecode

Yes

No

Other (write in)

Don't know

SECTION 4: About You

Finally, I'd like to ask you a few questions about yourself. These questions help us to see if there are any differences between the views of different people. Please be assured that all information will be kept completely confidential.

D1. Which of these age bands do you fall into? READ OUT

Singlecode

16-24

25-34

35-44

45-54

55-64

65-74

75+

Prefer not to say

D2. Gender

Singlecode

Male

Female

D3. Have you ever lived in the York area?

Singlecode

Yes

No

Prefer not to say

Don't know

D4. Which of these activities best describes what you do? READ OUT

Singlecode

Employee in full-time job (30 hours plus per week)

Employee in part-time job (under 30 hours per week)

Self employed; full or part time

Wholly retired from work

On government supported training programme (e.g. Modern Apprentice/ Training for Work)

Full-time education at school, college or university

Unemployed and available for work

Unemployed due to long term illness

Full-time carer for a disabled person (paid/ unpaid)

Looking after the home

Doing something else (Write in)

Prefer not to say

Don't know



D5. Including yourself, how many people aged 16 years old or older live in your household?

ENTER NUMBER

Prefer not to say

D6. How many people aged under 16 live in your household?

ENTER NUMBER

Prefer not to say

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8093_York_Residents_Survey\Survey\Galtres_GV_Residents_Survey_2018_Survey_(Commuters)_V1f.doc



7.2 Stimulus

For both surveys, the following two maps were made available via a website to telephone survey respondents and shown to all face-to-face respondents during the interview;



Diagram showing proposed site in relation to surrounding settlements outside York and relationship with York City Centre



Appendix 3

Extract from 23 January 2018 Local Plan Working Group Report

Local Plan Working Group

23rd January 2018

Report of the Assistant Director of Planning and Public Protection
(The Local Plan is the portfolio of the Leader and Deputy Leader)

City of York Local Plan

Summary

1. This purpose of the report is:
 - (i) To provide a background summary of the previous iterations of draft policies and the circumstances which led to the rationale of the Executive decision to approve the Pre-Publication Draft Local Plan for consultation;
 - (ii) To provide a summary of the present national policy and legislative context, including the “soundness” requirement and potential for Government intervention;
 - (iii) To report responses to the Autumn 2017 Pre Publication Draft Local Plan Consultation;
 - (iv) To provide Officers’ advice regarding appropriate responses to the Consultation outcomes; and
 - (v) To seek Member approval of the next steps in the York Local Plan making process.

Recommendations

2. The LPWG request Members of Executive to:
 - (i) Consider any potential changes to the pre publication draft Local Plan (Regulation 18) based on the information included within this report and associated annexes and confirm the basis on which the

Local Plan should be progressed to the Regulation 19 stage including a city wide consultation.

Reason: So that an NPPF compliant Local Plan can be progressed.

- (ii) Following decisions on the matters referred to in (i) above authority be delegated to the Assistant Director of Planning and Public Protection in consultation with the Leader and Deputy Leader to approve all policies necessary for the production of a composite Local Plan for the purposes of public consultation.

The Leader and Deputy Leader to keep Group Leaders informed through Group Leaders meetings.

Reason: So that an NPPF compliant Local Plan can be progressed

- (iii) Delegate to the Assistant Director of Planning and Public Protection in consultation with the Leader and Deputy Leader the consideration and approval of further technical reports and assessments to support the Local Plan including, but not limited to the SA/ SEA, HRA, Viability Study and Transport Assessment.

The Leader and Deputy Leader to keep Group Leaders informed through Group Leaders meetings.

Reason: So that an NPPF compliant Local Plan can be progressed.

- (iv) Delegate authority to the Assistant Director of Planning and Public Protection in consultation with the Leader and Deputy Leader to approve a consultation strategy and associated material for the purposes of a city wide consultation and to undertake consultation on a composite plan in accordance with that agreed strategy.

The Leader and Deputy Leader to keep Group Leaders informed through Group Leaders meetings.

Reason: So that an NPPF compliant Local Plan can be progressed.

Background

3. Officers produced a publication draft Local Plan in Autumn 2014. This process, however, was halted by Council resolution on the 9th October

21. Given the historical and national policy context associated with the development of the City of York Local Plan Members' attention is particularly drawn to the following key issues :

- Housing Need and Land Supply; and
- Employment Land Supply.

Housing Need and Land Supply

22. The historical approach taken to housing need and the related changing national policy context is detailed above. In addition comments received during consultation on this matter are included in Annex A and provided in summary below.

- Support was received for the principle of council meeting their entire objectively assessment housing need (OAHN).
- Some parish representations supported the 867 dwellings per annum figure particularly in comparison to the Government's proposed standardised methodology.
- In respect of housing numbers responses, particularly planning agents and developers, objected to using 867 dwellings per annum; the reasons for this included: the failure to comply with the Strategic Housing Market Assessment (2017) and the lack of conformity with both existing and emerging national policy.
- Some respondents objected to the approach taken to backlog, student housing and windfalls.
- The majority of responses from the public were in objection to proposed sites.

23. It is important to recognise that the proposed methodology included in the document produced by DCLG was for the purposes of consultation and may be subject to change (although at present it indicates the direction of travel anticipated for national policy). The methodology differs from that applied by the Council in reaching the housing need figures, and thus cannot be compared without further analysis. The reasons for this are outlined below.

24. As previously highlighted the Government's proposed methodology is forward looking and unlike the Council's methodology, does not add in any additional amounts for previously unmet demand. The City of York Local Plan has an effective start date of the 1st April 2012 in terms of population and housing. This is to fit with the position taken by Government in terms of their demographic projections. Using the Council's methodology, any under delivery against the housing target between 2012 – 2017 is accommodated over the life time of the plan.
25. In July the Executive agreed a figure of 867 dwellings per annum for the duration of the City of York Local Plan and Green Belt (until 2033 and 2038 respectively). As the Council's methodology includes provision to meet previous under supply within the 2012 to 2017 period, this means the plan as produced for the autumn 2017 consultation includes a sufficient overall supply to meet both these requirement.
26. Members must be satisfied that they consider the Submission Draft Plan meets the test of "soundness". This is a statutory duty. Officer's advice is that the direction of travel in national policy indicates that if the site proposals previously consulted on were increased this would be a more robust position. However, this is not to say that the proposals previously consulted on would be unreasonable; It is a matter for Members to determine the degree of risk they wish to take.
27. In Officer's opinion, an increase in the supply of housing would place the Council in a better position for defending the Plan proposals through the Examination process. However, Members will be aware of the counter arguments in particular the community responses to consultation. In addition in potentially increasing supply Members will also be mindful of the time required for achieving this more robust position in line with legislative requirements. An important issue to consider is whether changes can be made to the plan without undertaking additional consultation. This is a critical issue if the Council is to meet the May 2018 deadline for submission.
28. In response to developer proposals submitted during the Pre Publication Draft Local Plan Consultation (details of which are included in Annex A),

potential options for increasing the housing supply are set out in tables 1 to 4 below along with the potential risk in terms of the need for additional consultation. The table also highlights a small reduction on the Queen Elizabeth Barracks Site. This reflects outcomes from the Habitats Regulation Assessment.

Table 1: Potential changes to housing sites allocated in the Pre Publication Draft Local Plan in response to developer proposals (With minor or no boundary changes)

Allocation Reference	Site Name	No. Included in PPLP	Potential Revised Figure
ST5	York Central	1500	1700 - 2500
ST35	Queen Elizabeth Barracks, Strensall	578	500

29. Following consultation discussions have been held with representatives from the York Central Partnership. This has indicated that York Central is capable of accommodating between 1700 – 2400 residential units and that the higher figure of 2500 units could be achieved through detailed applications by developers for individual plots and / or flexibility to increase residential at the margins of the commercial core. The figure of 1700 reflects land currently under the partnerships control; the higher figure includes land in private ownership or currently used for rail operations.
30. The higher number is proposed to be part of the partnerships planning application anticipated in summer 2018.

Table 2: Potential changes to housing sites allocated in the Pre Publication Draft Local Plan in response to developer proposals (With boundary changes)

Allocation Reference	Site Name	No. Included in PPLP	Potential Revised Figure
ST 7	Land East of Metcalfe Lane	845	975
ST 14	Land West of Wiggington Road	1348	1,672
ST 15	Land West of Elvington Lane	3,339	3,901

31. Table 1 & 2 relates to increasing the capacity and extending existing site allocations. It is a matter of judgment as to whether the changes to the existing sites are “material”. However, in the context of the large strategic allocations, it is considered arguable by your officers that the additional land is not a material change. However, this is a matter of judgment, and there is a residual risk that the Examiner will take a different view and require the Council to undertake further consultation on this issue following submission.

Table 3: Potential new housing site allocations, in response to developer proposals (previously rejected housing sites)

Site Reference	Site Name	Potential Revised Figure
H28	Land North of North Lane, Wheldrake	88 dwellings / 3.15 ha
H2b (132)	Land at Cherry Lane	18 dwellings / 0.44 ha
H37 (6)	Land at Greystone Court Haxby	34 dwellings / 3.47 ha
SF10 (874)	Land North of Riverside Gardens Elvington	102 dwellings / 4.15 ha
H2a (33)	Racecourse stables off Tadcaster Road	98 dwellings / 2.44 ha (years 16-21)
964	Galtres Farm	1575 dwellings / 75 ha (years 16-21)

32. Table 3 includes sites that have in the past been assessed against the site selection criteria and rejected, but now given further work Officers feel should be considered. These could potentially be included in the Publication Draft without the need for a further additional consultation, as they have already been the subject of public scrutiny through previously published Local Plan evidence or SA/ SEA. There is however a higher risk than tables 1 & 2 that the Examiner may find further consultation is needed.

Table 4: Potential completely new housing site allocations in response to developer proposals

Site Reference	Site Name	No. Included in PPLP	Potential Revised Figure
956	Milestone Avenue, Rufforth	n/a	9 dwellings / 0.37 ha
959	Land at Kettlestring Lane, Clifton Moor	n/a	92 dwellings / 3.2 ha (years 16-21)

33. Table 4 includes new sites that have emerged during the Autumn 2017 Consultation. Although they do meet the requirements of the site selection methodology and therefore potentially represent reasonable alternative, they have not been included in any previous consultation. If any of these sites were to be included in the next stage of the Local Plan the lack of consultation creates a risk to process and the Examiner could require further consultation before the Examination could proceed. Carrying out further consultation now about proposing to include these new sites would mean that the May 2018 date for submission could not be met.

Employment Land Supply

34. The Employment Land Review (ELR) July 2016 published as part of the Preferred Sites Consultation used projections by Oxford Economics (OE) dated May 2015 as the forecast for employment land demand over the Local Plan period. These forecasts provided the starting point for determining the amount and type of employment land required to be identified in the Plan. The projections by Oxford Economics presented a baseline scenario for York forecasting a job growth of 10,500 jobs over the period 2014-2031. Two further scenarios were considered by OE; scenario 1 – higher migration and faster UK recovery, which identified an additional 4,900 jobs above the baseline over the same period and scenario 2 – re-profiled sector growth which identified 500 additional jobs above the baseline. Scenario 2 was endorsed as it reflected the economic policy priorities of the Council to drive up the skills of the workforce and encourage growth in businesses which use higher skilled staff.
35. To sensitivity test the original 2015 OE projections, the latest Experian economic forecasts within the Regional Econometric Model (REM) were used. The conclusion was that the original forecasts were still robust. At the Executive in July 2017 Members endorsed this position.
36. During the consultation a range of points were raised. These are provided in summary below:

Galtres Garden Village

Submitted for:

residential



Pre Publication Consultation Responses

PPC Response From:

ID 13099

O'Neill Associates OBO Galtres Village Development Com

Summary of Response Received:

Galtres Village Development Comapnay object to the rejection of thier previously submitted boudnaries and propose a revised boundary of 77.37 ha for 1753 dwellings of which 1403 would be market and affordable dwellings, 286 for retirement dwellings and a 64 bed care-home (4117 residents in total) as well as 15.6 ha new country park and 3.49 ha for community facilities, including a primary school. Indicative site density would be 32 dph. The revised boundary reflects consideration of officer's previous comments on the site; the boundary has been pushed back setting the development away from the ring-road (similarly to other allocated sites) with improved access off North Lane to be a standalone site. Site is landscape-led to and responds to location and evidence base undertaken. Able to deliver 30% affordable housing on site in an innovative way and would support self and custom house building. With financial support from HCA and Council there is also the ability to deliver affordable housing through accelerated delivery in the first 5 years. Consider that the site is suitable, deliverable and viable (using PBA Viability methodology). The site is predominantly a mixture of arable farmland, pasture and woodland. It is considered that the land does not meet green belt purposes. Evidence base underpinning the site submitted includes: Indicative masterplan, Transport Technical Note, Landscape Capacity Report, Ecology Report, Heritage Report, Flood Risk Assessment and Drainage statement, Phase 1 habitat report and Heritage Appraisal as well as a prospectus for delivery.

Officer Analysis:

The revised boundary submitted for Galtres Garden village has a total site area is 92.97 hectares and the proposed development area approximately 77.37 hectares. Whilst the site passes the first 3 site selection criteria but fails the sustainable access criteria (4a and 4b) not meeting the minimum scoring threshold for residential sites. Given the size of the development and its location, it would be expected to provide commensurate facilities within walking distance of new residential development. It is noted that the revised masterplan includes the provision of a 'village hub' which it is proposed would include a primary school, playing pitches and retail/community facilities (circa 0.15ha). Provision of a village centre including an appropriate range of shops and community facilities would be

essential to make this site function as a sustainable settlement. This provision would need to be taken into account in considering the overall viability of the site.

Amber - In terms of access, the primary access points are proposed off North Lane with a new roundabout junction leading into the site. At a strategic level there is currently no evidence that transport should be considered to be a 'show stopper' for this site - provided that effective measures to both to reduce car trip generation and to mitigate against the impact of the residual car trips are put in place. However, the proximity of the development to the Strategic Road Network, in particular issues with the North Lane junction with the A64, would need to be addressed with Highways England. Furthermore, there are some concerns with the proposed width of North Lane leading up to the two roundabouts as the new local distributor road for Galtres Village as this is considered to be narrow.

Amber - In relation to ecology, the main issue to consider are potential impacts on Strensall Common SAC, which although to the north, may receive adverse effects as a result of increased recreational pressure. In their previous 2016 Habitat Regulations Screening submission this concludes Likely Significant Effects from recreation. This scheme is significantly different in scale and has also increased the amount of open space provision (including dedicated Country Park) but would still need to be considered in the Council's HRA process for recreational impacts and air quality. There is a clear intent to include significant open space but further work is necessary to understand whether likely significant effects can be excluded.

The Phase 1 Habitat Survey undertaken in September 2017 identified the need for a number of surveys and therefore there are other potential ecological issues e.g. presence of barn owls, hedgerows, breeding/wintering birds, great crested newts, water vole, bats etc. We note that bird species recorded in 2013/2014 (on the previous boundary but provided as information for the new boundary) includes lapwing, curlew and golden plover, which are birds associated with the Lower Derwent Valley SPA. Further work is necessary to understand any functional links to the LDV and requirements to avoid, mitigate or compensate for ecology.

Amber – In comparison to previous boundaries considered for this site, it is recognised that the extent of the proposed garden village has been moved away from the A64. Notwithstanding that however, it is still likely to be perceived as an urban extension rather than a separate outlying village and therefore goes against the grain of the inherited pattern of settlements around York. Whilst North Lane lends itself to the creation of a rural context for the proposed Galtres Village (although highway engineering would result in significant change to the character of this route) the distance between this site and proposed allocation ST8 is very short. Consequently, as the viewer travels along the road network in this area, the proximity of Galtres village would be so close to Monks Cross (a significant extension) that it could read as a further urban extension and encroachment into the countryside, rather than a separate village within a rural setting. This compounded especially as North Lane would be used as a direct link between the A64 and the outer ring road. For other sites considered, we have sought to retain the rural character along the lane and protect the countryside setting. North Lane continues east of the ring road and is currently still rural in character. The illustrative master plan places considerable reliance on woodland planting around the perimeter to screen and contain the development but the A1237 is on a southwest

trajectory at this point, thus rapidly pulling it away from the proposed allocation and its influence on the setting of the city as experienced from the ring road.

The scheme includes a country park and a cycle route to Earswick. This would be of great value to the development and provide green links between the settlements of Earswick and Galtres, which would also be available to the residents of Earswick. It would provide wider access to the countryside although it is relatively small, so would only provide for the most immediate population.

Potential new housing site allocation (previously rejected housing site)

Appendix 4

Table of Outstanding Commitments April 2018

Ward	Parish	SITE NAME	Easting	Northing	Core Strategy Location Zone	Applic. Number	Date permission Granted	Status of Site at 31/03/2018	Expiry Date of Consent	Total Built	Total Capacity	Total Remaining	Net Total Remaining	Type of Housing	Number of Bedrooms	New/Conv/COU	Loss of units	GF/BF	Site size (ha)
Rural W	Upper Pop	Grange Farm Hodgson Lane Upper Poppleton	455098	453725	Rural	04/00186/FUL	20/06/2005	Under Construction	N/A	0	6	6	6	6 No town houses	2 x 2 bed, 4 x 3 bed	COU	No	GF	0.216
Dring & Wthp		Proposed New Dwelling St Edwards Close	458892	449626	Urban	17/01963/FUL	09/11/2004	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GF	0.550
Mick		All Saints Church North Street	460054	451755	City Centre	05/00048/FUL	20/03/2009	Under Construction	N/A	0	3	3	3	2 No town houses, 1 No flat	1 x 1 bed flat, 2 x 2 bed town houses	New	No	BF	0.161
Hunt & Ne	Huntington	59 The Old Village Huntington	461707	456309	Sub-Urban	05/01581/FUL	21/04/2006	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GF	0.026
Heslington	Heslington	Enclosure Farm Main Street Heslington	462858	450298	Sub-Urban	07/01046/FUL	13/08/2007	Under Construction	N/A	1	3	2	2	1 No detached house, 1 No detached Bungalow	1 x 6 bed det house, 1 x 2 bed det bung	COU	No	BF	0.223
Mick		Moat Hotel Nunnery Lane	459990	451279	Urban	08/01049/FUL	15/07/2008	Under Construction	N/A	3	4	1	1	1 No flats	1 x 2 bed	COU	No	BF	0.069
Strensall	Earswick	Store Adj to 45 The Village Earswick	461673	457200	Small Village	08/02677/FUL	24/03/2009	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	New	No	BF	0.239
Westfld		48 Wetherby Road	456732	451446	Sub-Urban	09/01338/FUL	29/10/2009	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	GDN	0.069
Fisher		4 Derwent Road	460950	449874	Urban	10/00267/FUL	14/05/2010	Under Construction	N/A	1	2	1	1	1 No Semi-detached houses	1 x 3 bed	New	Yes (demolish -1)	BF/GDN	0.050
Strensall	Earswick	4 Willow Grove Earswick	462125	457288	Small Village	10/00297/FUL	10/01/2011	Under Construction	N/A	0	2	2	1	2 No detached bungalows	1 x 3, 1 x 4 bed	New	Yes (demolish -1)	BF/GDN	0.085
Strensall	Stockton o	Stockton Lodge Sandy Lane Stockton on Forest	466396	456849	Small Village	10/00617/FUL	11/03/2013	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.035
Strensall	Stren & To	The Grange Towthorpe Road Haxby	462368	458645	Rural	10/02764/FUL	02/02/2011	Under Construction	N/A	0	1	1	1	1 No town house	1 x 3 bed	COU	No	BF	0.080
Accomb		145 Beckfield Lane	456893	452297	Sub-Urban	11/00454/FUL	27/05/2011	Under Construction	N/A	0	5	5	4	5 No Flats	5 x 1 bed	Conv	Yes -1	BF	0.079
HewW	HewW	Rowes Farm Bungalow Stockton Lane	463564	454215	Rural	11/02928/FUL	09/08/2012	Under Construction	N/A	0	2	2	2	2 No town houses	2 x 2 bed	COU	No	GF	0.100
Hunt & Ne	Huntington	Beechwood Beechwood Hopgrove	463789	455565	Rural	11/03113/FUL	26/04/2012	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 5 bed	COU	No	GF	0.093
Strensall	Stockton o	Methodist Chapel The Village Stockton on Forest	465557	455953	Small Village	12/00241/FUL	23/04/2012	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 7 bed	New	No	BF	0.076
Strensall	Stockton o	Chapel Farm 111 The Village Stockton on Forest	465801	456231	Small Village	12/01216/FUL	02/07/2012	Under Construction	N/A	0	1	1	1	1 No town house	1 x 3 bed	COU	No	GF	0.055
Mick		JW Frame (Plumbers) Ltd 9a Smales Street	460068	451439	City Centre	13/00271/FUL	19/04/2013	Under Construction	N/A	0	1	1	1	1 No town house	1 x 2 bed	COU	No	BF	0.006
Hew		86 Heworth Green	461382	452646	Urban	13/00957/FUL	09/07/2013	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.030
Denwt	Dunnington	25 Garden Flats Lane Dunnington	467025	452826	Village	16/00337/REM	10/10/2016	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 4 bed	New	No	GDN	0.134
Guilh		Mack & Lawler Builders Ltd 2a Low Ousegate	460245	451681	City Centre	16/02710/ORC	06/03/2017	Not yet started	06/03/2022	0	8	8	8	8 No flats	8 x 2 bed	COU	No	BF	0.022
Strensall	Stockton o	Stockton Lodge Sandy Lane Stockton on Forest	466396	456849	Small Village	13/02626/FUL	17/10/2013	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 5 bed	New	No	GDN	0.039
Accomb		1A Danebury Crescent	457092	451686	Sub-Urban	13/02685/FUL	26/11/2013	Under Construction	N/A	0	2	2	2	2 No detached bungalows	2 x 2 bed	New	No	GDN	0.111
Strensall	Stockton o	Church Farm 84 The Village Stockton on Forest	465681	456066	Small Village	13/02755/FUL	28/03/2014	Under Construction	N/A	1	2	1	1	1 No detached houses	1 x 3 bed	New	No	GF	0.320
Hew		2a Mill Lane	461249	452623	Urban	13/03153/FUL	18/11/2013	Under Construction	N/A	0	3	3	3	3 No flats	1 x 1 & 2 x 2 bed	New	No	BF	0.024
Bishopthor	Bishopthor	Manor Farm Bishopthorpe Road	460029	449213	Rural	13/03403/FUL	05/02/2014	Under Construction	N/A	0	1	1	1	1 No town house	1 x 4 bed	COU	No	GF	0.010
Guilh		Bronze Dragon 51 Huntington Road	460908	452879	Urban	13/03573/FUL	17/01/2014	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 1 bed	New	No	BF	0.015
Mick		English Martyrs Church Hall Dalton Terrace	459313	451127	City Centre	13/03595/FUL	15/05/2014	Under Construction	N/A	0	4	4	4	4 No flats	1 x 1 & 3 x 3 bed	New	No	BF	0.027
Clifton		Bert Keech Bowling Club Sycamore Place	459653	452395	Urban	13/03727/FUL	07/01/2016	Not yet started	07/01/2019	0	5	5	5	4 No town houses, 1 No detached house	4 x 5 bed town houses, 1 x 6 bed detached house	New	No	GF	0.222
HewW	HewW	QED Books 1 Straylands Grove	461832	453509	Urban	14/00098/FUL	12/03/2014	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	GDN	0.070
Rural W	Copmanthorpe	105 Temple Lane Copmanthorpe	457748	446020	Rural	14/00099/FUL	22/10/2014	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 3 bed	Conv	No	BF	0.170
Strensall	Stren & To	Middleton House 2 Redmayne Square Strensall	463784	461237	Large Village	17/00308/FUL	05/04/2017	Not yet started	05/04/2020	0	1	1	1	1 No detached house	1 x 5 bed	New	No	GDN	0.090
Accomb		1 Wetherby Road	456990	451497	Sub-Urban	14/00511/REM	10/06/2014	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	GDN	0.060
Fulford	Fulford	Raddon House 4 Fenwicks Lane	460846	449312	Sub-Urban	14/00613/FUL	26/11/14	Under Construction	N/A	0	1	1	0	1 No detached house	1 x 5 bed	New	Yes (demolish -1)	BF	0.940
Rural W	Upper Pop	37 Station Road Upper Poppleton	455892	453757	Large Village	14/00929/FUL	26/08/2014	Under Construction	N/A	0	1	1	0	1 No detached house	1 x 4 bed	New	Yes (demolish -1)	BF	0.100
Bishopthor	Copmanthorpe	Mar-Stan Temple Lane Copmanthorpe	458081	445880	Rural	17/00248/FUL	19/04/2017	Not yet started	19/04/2020	0	1	1	0	1 No detached bungalow	1 x 3 bed	New	Yes (demolish -1)	BF	0.170
Skel/Rawd	Skelton	Del Monte Skelton Park Trading Estate Skelton	456799	455860	Village	14/01478/OUTM	09/03/2016	Not yet started	09/03/2019	0	60	60	60	Not yet confirmed	Not yet confirmed	New	No	BF	2.290
Westfld		G1 Newbury Avenue	457830	450303	Urban	14/01517/GRG3	08/10/2014	Not yet started	08/10/2017	0	9	9	9	9 No flats	1 x 1, 8 x 2 bed	New	No	BF	0.282

Derwt	Holby	Piker Thorn Farm Bad Bargain Lane	465016	454232	Rural	14/01761/FUL	16/09/2014	Under Construction	N/A	0	1	1	0	1 no detached bungalow	1 x 2 bed	New	Yes (demolish -1)	GDN	0.026
Fisher		1-12 Kensal Rise	460937	450731	Urban	14/01857/FUL	09/01/2015	Not yet started	09/01/2018	0	6	6	6	6 No flats	2 x 1, 4 x 2 bed	Conv	No	BF	0.150
Hax & Wig	Haxby	The Memorial Hall 16 The Village Haxby	460834	458229	Large Village	14/01982/FUL	09/01/2015	Under Construction	N/A	0	3	3	3	3 No town houses	3 x 2 bed	New	No	BF	0.050
Raw & Cliff	Rawcliffe	North Lodge Clifton Park Avenue	458481	453848	Sub-Urban	16/01173/FULM	02/12/2016	Under Construction	N/A	0	14	14	14	14 No flats	2 x 1, 12 x 2 bed	New	No	BF	0.127
Guilhi		1 Paver Lane	460893	451554	City Centre	17/01637/FUL	15/09/2017	Under Construction	N/A	0	2	2	2	2 No town houses	1 x 1, 1 x 2 bed	COU	No	BF	0.020
Dring & Wthp		306 Tadcaster Road	458910	450128	Urban	14/02074/FUL	15/09/2016	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 2 bed	Conv	No	BF	0.040
Wheldrake	Wheldrake	Wheldrake Hall Farm 6 Church Lane Wheldrake	468350	444879	Rural	17/00636/ABC	15/05/2017	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	COU	No	GF	0.040
Bishopthorpe	Bishopthorpe	Site of Ferry Cottage 6 Ferry lane Bishopthorpe	459846	447665	Rural	17/02304/FUL	06/02/2018	Not yet started	06/02/2021	0	1	1	0	1 No detached house	1 x 3 bed	New	yes (demolish -1)	BF	0.214
Rural W	Nether Poppleton	Barn South of Greystones Church Lane Nether Poppleton	456327	454999	Large Village	14/02531/FUL	08/01/2015	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	Conv	No	BF	0.380
Mick		Villa Italia 69 Micklegate	459918	451604	City Centre	14/02546/FUL	13/11/2015	Under Construction	N/A	0	4	4	4	3 No flats, 1 No detached house	2 x 1, 1 x 2 bed flats, 1 x 2 bed detached house	COU/New	No	BF	0.020
Bishopthorpe	Bishopthorpe	Manor Farm Bishopthorpe Road	460029	449213	Rural	14/02859/ABC3	05/02/2015	Under Construction	N/A	0	1	1	1	1 No town house	1 x 3 bed	COU	No	GF	0.010
Strensall	Earswick	OS Field 2424 Wisker Lane Earswick	463262	457225	Rural	15/00060/ABC3	04/03/2015	Not yet started	04/03/2020	0	3	3	3	3 No town houses	3 x 2 bed	COU	No	GF	0.100
Holgate		Gateway 2 Holgate Park Drive	458515	451715	City Centre Ext 1	15/00150/ORC	17/03/2015	Not yet started	17/03/2020	0	0	0	0	TBA	TBA	COU	No	BF	0.272
Westfild		Co-op 47 York Road Acomb	457658	451434	Urban	15/00238/FUL	02/07/2015	Under Construction	N/A	0	1	1	1	1 No flat	1 x 1 bed	COU	No	BF	0.013
Heworth		First Floor Flat 126 Haxby Road	460604	453218	Urban	15/00254/FUL	07/04/2015	Under Construction	N/A	0	1	1	1	1 No flat	1 x 2 bed	COU	No	BF	0.015
Strensall	Stren & Tom	Middleton House 2 Redmayne Square Strensall	463779	461250	Large Village	15/00362/FUL	29/05/2015	Not yet started	29/05/2018	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.040
Holgate		Direct Workwear 158 Poppleton Road	458152	452144	Urban	15/00385/FUL	23/04/2015	Not yet started	23/04/2018	0	1	1	1	1 No flat	1 x 1 bed	COU	No	BF	0.006
Hax & Wig	Wigginton	OS Field 0005 Sutton Road Wigginton	459033	460295	Rural	15/00449/FUL	14/05/2015	Under Construction	N/A	0	1	1	0	1 No detached bungalow	1 x 3 bed	New	Yes (demolish -1)	BF	0.070
Holg		Orchard House 8 Hamilton Drive East	458913	451166	Urban	15/00561/FUL	28/05/2015	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 2 bed	New	No	GDN	0.087
Wheldrake	Elvington	The Barn Dauby Lane Elvington	469492	448599	Rural	15/00638/ABC3	19/05/2015	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 3 bed	COU	No	GF	0.010
Fisher		Friars Rest Guest House 81 Fulford Road	460840	450812	Urban	15/00677/FUL	17/06/2015	Not yet started	17/06/2018	0	1	1	1	1 No town house	1 x 5+ bed	COU	No	BF	0.020
Skelt/Rawd	Rawcliffe	11A Rosecroft Way	458395	453912	Sub-Urban	15/00708/FUL	16/09/2015	Not yet started	16/09/2018	0	1	1	1	1 No town house	1 x 3 bed	New	No	GDN	0.069
Dring & Wthp		257 Thanel Road	457888	450042	Urban	15/00709/FUL	29/05/2015	Not yet started	29/05/2018	0	1	1	1	1 No detached Bungalow	1 x 3 bed	New	No	GDN	0.016
Rural W	Askham Bryan	107 Main Street Askham Bryan	455114	448357	Small Village	15/00889/FUL	24/06/2015	Under Construction	N/A	0	1	1	0	1 No detached house	1 x 4 bed	New	Yes (demolish -1)	BF	0.100
Wheldrake	Naburn	Pear Tree Cottage	459857	445562	Small Village	15/01037/FUL	22/10/2015	Under Construction	N/A	0	1	1	0	1 No detached house	1 x 4 bed	New	Yes -1	BF	0.077
Mick		7 Charlton Street	460204	450903	Urban	15/01083/FUL	28/07/2015	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 1 bed	New	No	GDN	0.010
Strensall	Earswick	6 Willow Grove Earswick	462140	457288	Small Village	15/01152/FUL	10/12/2015	Not yet started	10/12/2018	0	2	2	1	2 No detached bungalows	2 x 3 bed	New	Yes	GDN	0.126
Guilhi		68 Bootham	459810	452422	City Centre	15/01157/FUL	16/10/2015	Not yet started	16/10/2018	0	1	1	1	1 No detached house	1 x 3 bed	New	No	BF	0.040
Mick		4 Scarcroft Lane	459825	451211	Urban	17/01722/FUL	22/09/2017	Not yet started	22/09/2020	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.012
Heworth		York House 62 Heworth Green	461328	452681	Urban	15/01196/FUL	10/08/2015	Not yet started	10/08/2018	0	3	3	2	3 No flats	1 x 2, 2 x 3 bed	COU/Conv	Yes -1	BF	0.076
Acomb		Site to R/O 1-3 Backfield Lane	458912	451585	Sub-Urban	16/02269/FULM	18/10/2017 Won on appeal	Under Construction	N/A	0	11	11	11	No semi-detached bungalows, 1 No detached bungalow	town houses, 2 x 3 bed semi-detached bungalows, 1 x 3 bed detached bungalow	New	No	GDN	0.270
Heworth		Former Londons 31a Hawthorne Grove	461290	452513	Urban	17/00088/FULM	31/07/2017	Under Construction	N/A	0	10	10	10	10 No flats	8 x 1, 2 x 2 bed	COU	No	BF	0.070
Wheldrake	Elvington	Oak Trees Elvington Lane Elvington	468469	448239	Rural	17/01376/REM	16/08/2017	Not yet started	16/08/2019	0	1	1	1	1 No detached bungalow	1 x 4 bed	New	No	BF	0.780
Hunt & Nel	New Earswick	Land to North and West of 41 & 43 Park Avenue New Earswick	460636	456038	Sub-Urban	15/01390/FUL	11/02/2016	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GF	0.115
Hax & Wig	Haxby	Vacant Land South of 39 Sandringham Close Haxby	460281	457055	Large Village	17/00614/FUL	16/06/2017	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	GF	0.043
Hax & Wig	Wigginton	Wigginton Grange Farm Corban Lane Wigginton	458978	458765	Rural	15/01441/FUL	07/09/2015	Under Construction	N/A	0	1	1	0	1 No detached house	1 x 6 bed	New	Yes (demolish -1)	BF	0.013
Strensall	Stockton on Forest	Church Farm 84 The Village Stockton on Forest	465681	456066	Small Village	15/01446/FUL	25/02/2016	Under Construction	N/A	0	3	3	3	3 No detached houses	1 x 3, 2 x 4 bed	New	No	GF	0.170
Guilhi		6 Peckitt Street	460362	451464	City Centre	15/01447/FUL	14/09/2015	Not yet started	14/09/2018	0	1	1	1	1 No town house	1 x 4 bed	COU	No	BF	0.010
Guilhi		Barry Crux 20 Castlegate	460414	451605	City Centre	15/01522/FUL	22/01/2016	Not yet started	20/01/2019	0	2	2	2	2 No flats	1 x 1, 1 x 2 bed	COU	No	BF	0.023
Westfild		Beau & Joli Ltd 1st & 2nd Floors 43 York Road Acomb	457670	451437	Urban	15/01578/RFPFR	10/09/2015	Not yet started	10/09/2020	0	1	1	1	1 No flat	1 x 2 bed	COU	No	BF	0.018

Hax & Wig	Haxby	14 The Avenue Haxby	461016	457701	Large Village	15/01598/FUL	06/11/2015	Not yet started	06/11/2018	0	1	1	1	1 No detached house	1 x 2 bed	New	No	GDN	0.026	
Guilhi		Site to Rear of 22a Huntington Road	460940	452668	Urban	15/01752/FUL	02/10/2015	Not yet started	02/10/2018	0	2	2	2	2 No semi-detached houses	2 x 2 bed	New	No	BF	0.020	
Rural W	Rufforth &	Land to East of Orchard Vale Wetherby Road Rufforth	452908	451529	Small Village	15/01808/FUL	11/12/2015	Not yet started	11/12/2018	0	1	1	1	1 No detached house	1 x 5 bed	New	No	GF	0.085	
Copmanthorpe	Copmanthorpe	Station Cottages Station Road Copmanthorpe	456668	446507	Village	15/01886/FUL	18/05/2016	Not yet started	18/05/2019	0	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	GDN	0.050	
Strensall	Stren & To	42 Middlecroft Drive Strensall	462878	460386	Large Village	15/01895/FUL	08/03/2016	Not yet started	08/03/2019	0	1	1	1	1 No semi-detached house	1 x 2 bed	New	No	GDN	0.012	
Guilhi		Fire Station 18 Clifford Street	460360	451493	City Centre	15/02155/FULM	02/09/2016	Under Construction	N/A	0	14	14	14	7 No town houses, 7 No flats	5 x 2, 2 x 3 bed flats, 7 x 4 bed town houses	New	No	BF	0.140	
Mick		Car Parking Area Holgate Road	459499	451253	City Centre	15/02295/FUL	01/03/2016	Not yet started	01/03/2019	0	6	6	6	6 No flats	6 x 1 bed	New	No	BF	0.032	
Fuiford & Heslington	Heslington	24 Main Street Heslington	462856	450204	Sub-Urban	15/02532/FUL	23/05/2016	Under Construction	N/A	0	1	1	-1	1 No town house	1 x 6 bed	Conv	Yes -1	BF	0.057	
Clifton		St Marys Hotel 16-17 Longfield Terrace	459633	452211	Urban	15/02544/FUL	05/01/2016	Not yet started	05/01/2019	0	2	2	2	2 No town houses	1 x 3, 1 x 4 bed	COU	No	BF	0.025	
Mick		5 Cherry Hill Lane	460279	451139	Urban	15/02576/FUL	23/03/2016	Not yet started	23/03/2019	0	2	2	1	2 No semi-detached bungalows	2 x 1 bed	Conv	Yes -1	BF	0.019	
Hunt & Neighbourhood	Huntington	2 Meadow Way Huntington	461903	455735	Sub-Urban	15/02617/FUL	16/02/2016	Not yet started	16/02/2019	0	1	1	1	1 No detached bungalow	1 x 2 bed	New	No	GDN	0.025	
Heworth Without		206 Stockton Lane	462421	453266	Sub-Urban	15/02624/FUL	11/03/2016	Not yet started	11/03/2019	0	4	4	4	3 No detached houses, 1 No detached bungalow	all 4 bed properties	New	No	GDN	0.190	
Osbaldwick	Osbaldwick	15 Murton Way	463657	451931	Sub-Urban	15/02650/FUL	20/05/2016	Not yet started	20/05/2019	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.070	
Fisher		Melbourne Hotel 6 Cemetery Road	460935	450963	Urban	15/02739/FUL	01/04/2016	Under Construction	N/A	0	6	6	6	4 No flats, 2 No town houses	1 x 1 & 3 x 2 bed flats, 2 x 3 bed town houses	COU/New	No	BF	0.036	
Guilhi		Maccdonalds 19-22 Fossgate	460567	451766	City Centre	15/02760/FUL	05/02/2016	Under Construction	N/A	0	5	5	5	1 No flat, 4 No town houses	1 x 1 bed flat, 1 x 2 & 3 x 3 bed town houses	COU	No	BF	0.116	
Guilhi		Colin Hicks Motors Garage & Yard to R/O 33 Bootham	460061	452367	City Centre	17/01546/FUL	23/01/2018	Not yet started	23/01/2021	0	14	14	14	14 No flats	13 x 1, 1 x 2 bed	New	No	BF	0.050	
Osb & Dennington	Dunnington	8 Petercroft Lane Dunnington	467161	452737	Village	15/02813/FUL	06/05/2016	Not yet started	06/05/2019	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.031	
Acomb		4 Jorvik Close	457082	452286	Sub-Urban	15/02825/FUL	16/06/2016	Under Construction	N/A	0	1	1	1	1 No town house	1 x 3 bed	New	No	GDN	0.017	
Strensall	Earswick	Fossbank Boarding Kennels Strensall Road	461850	457772	Rural	16/02792/OUT	07/02/2017	Not yet started	07/02/2020	0	4	4	4	4 no detached houses	2 x 3, 2 x 5 bed	New	No	BF	0.320	
Heworth		Wall to Wall Ltd 71 East Parade	461494	452574	Urban	15/02878/FUL	02/03/2016	Not yet started	02/03/2019	0	1	1	1	1 No detached bungalow	1 x 2 bed	COU	No	BF	0.016	
Raw & Cliff	Rawcliffe	Site to Side of 2 Holyrood Drive fronting onto Manor Lane	457981	455023	Sub-Urban	16/02230/FUL	20/17 Won on a	Under Construction	N/A	0	4	4	4	4 No semi-detached houses	4 x 3 bed	New	No	GF	0.084	
Mick		Hudson House Toft Green	459759	451619	City Centre	17/00576/FULM	23/08/2017	Under Construction	N/A	0	127	127	127	127 No Flats	49 x 1, 73 x 3, 5 x 3 bed	New	No	BF	0.550	
Mick		23 Nunnery Lane	459930	451281	Urban	16/00123/FUL	23/03/2016	Under Construction	N/A	0	1	1	1	1 No flat	1 x 2 bed	COU	No	BF	0.009	
Mick		14 Priory Street	459883	451464	City Centre	16/00261/FUL	17/05/2016	Under Construction	N/A	0	2	2	1	2 no flats	1 x 2, 1 x 3 bed	Conv	Yes -1	BF	0.011	
Guilhi		Marygate Orthodontic Practice 64 Marygate	459784	452144	City Centre	16/00500/FUL	03/05/2016	Not yet started	03/05/2019	0	1	1	1	1 No town house	1 x 4 bed	COU	No	BF	0.016	
Strensall	Stockton on	Carlton Cottage Old Carlton Farm Common Lane Warthill	467176	456592	Rural	16/02604/FUL	04/01/2017	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 2 bed	Conv	No	BF	0.070	
Guilhi		36 Clarence Street	460295	452670	Urban	16/00799/FUL	16/06/2016	Under Construction	N/A	0	4	4	4	4 No flats	4 x 1 bed	New	No	GDN	0.011	
Mick		Newington Hotel 147 Mount Vale	459252	450772	Urban	16/00833/FUL	14/06/2016	Under Construction	N/A	0	7	7	7	7 No town houses	2 x 2, 1 x 3, 2 x 4, 2 x 5 bed	COU/New	No	BF	0.204	
Dining & Whyp		Land Between 8 & 12 White House Gardens	459039	450518	Urban	16/00870/FUL	08/07/2016	Not yet started	08/07/2019	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.045	
Osbaldwick	Kexby	Woodhouse Farm Dauby Lane Kexby	468905	449631	Rural	16/02558/FUL	16/01/2017	Under Construction	N/A	0	1	1	1	1 No semi-detached bungalow	1 x 3 bed	Conv	No	BF	0.086	
Hull Rd		47 Osbaldwick lane	462683	451621	Urban	16/00988/FUL	29/07/2016	Not yet started	29/07/2019	0	1	1	1	1 No town house	1 x 2 bed	New	No	GDN	0.015	
Mick		2 Culance Walk	459982	451232	Urban	16/01011/FUL	19/09/2016	Under Construction	19/06/2016	19/09/2019	0	4	4	2	4 No flats	4 x 1 bed	Conv	Yes -2	BF	0.020
Westfield		Mustelgear Ltd 43 Front Street Acomb	457306	451280	Sub-Urban	16/01014/FUL	21/06/2016	Not yet started	21/06/2019	0	2	2	2	2 No flats	2 x 1 bed	New	No	BF	0.016	
Guilhi		Stonebow House The Stonebow	460548	451853	City Centre	16/01003/FUL	10/10/2016	Under Construction	N/A	0	5	5	5	5 No flats	1 x 1, 4 x 3 bed	COU	No	BF	0.173	
Guilhi		Stonebow House The Stonebow	460548	451853	City Centre	16/01018/ORC	17/06/2016	Under Construction	N/A	0	15	15	15	15 No flats (indicative)	5 x 1, 7 x 2, 3 x 3 bed (indicative)	COU	No	BF	0.173	
Heworth W/HewW		306 Stockton Lane	462930	453578	Sub-Urban	16/01154/FUL	26/09/2016	Not yet started	N/A	0	1	1	1	1 no detached bungalow	1 x 2 bed	New	No	GDN	0.025	
Guilhi		Crook Lodge 26 St Marys	459732	452301	City Centre	16/01177/FUL	30/06/2016	Not yet started	30/06/2019	0	1	1	1	1 No town house	1 x 7 bed	COU	No	BF	0.028	
Copmanthorpe	Copmanthorpe	134 Temple Lane Copmanthorpe	457935	445895	Rural	16/01185/FUL	08/07/2016	Under Construction	N/A	0	2	2	2	2 No semi-detached houses	2 x 1 bed	Conv	No	BF	0.100	
Fisher		Flat 1 8 Wenlock Terrace	460788	450439	Urban	16/01188/FUL	05/07/2016	Not yet started	05/07/2019	0	9	9	4	9 No flats	9 x 1 bed	Conv	Yes -5	BF	0.020	
Strensall	Stren & To	The Firs Lords Moor Lane Strensall	463846	460870	Large Village	16/01239/REM	20/07/2016	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.117	
Guilhi		Herbert Todd & Son Percys Lane	460925	451611	City Centre	16/01263/FULM	26/08/2016	Under Construction	N/A	0	38	38	38	26 No Flats 12 No Town Houses	20 x 1, 6 x 3 bed flats, 4 x 5, 8 x 6 bed town houses	New	No	BF	0.160	

Rural W	Rufforth &	Rufforth Aerodrome Bradley Lane Rufforth	453699	450614	Rural	16/01303/REM	02/08/2016	Not yet started	20/05/2019	0	1	1	1	1	1 No detached house	1 x 4 bed *not yet confirmed	New	No	GF	0.010
Acomb		23 The Green Acomb	457158	451396	Sub-Urban	16/01306/FUL	03/08/2016	Under Construction	N/A	0	1	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.050
Wheldrake	Deighton	Ackroyds Restaurant Meats Deighton	462444	445659	Rural	16/01318/FUL	12/08/2016	Not yet started	12/08/2019	0	1	1	1	1	1 No detached house	1 x 5 bed	COU	No	BF	0.150
Wheldrake	Wheldrake	Garth Cottage 8 Church Lane Wheldrake	468373	444973	Small Village	16/01353/FUL	01/09/2016	Under Construction	N/A	0	1	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.019
Guilhl		Unidec Systems Ltd Manor Chambers 26a marygate	459900	452257	City Centre	16/01428/ORC	23/09/2016	Not yet started	23/09/2021	0	3	3	3	3	3 No flats	3 x 2 bed	COU	No	BF	0.037
Heworth		140 Fourth Avenue	462132	452243	Urban	16/01459/FUL	17/08/2016	Not yet started	17/08/2019	0	1	1	1	1	1 no town house	1 x 3 bed	New	No	GDN	0.027
Guilhl		Garage Court Agar Street	460799	452375	City Centre	16/01469/FUL	10/08/2016	Under Construction	N/A	0	3	3	3	3	3 No town houses	3 x 2 bed	New	No	BF	0.074
Westfld		Acomb Jewellers 10 Acomb Court Front Street	457516	451411	Sub-Urban	16/01497/FUL	24/08/2016	Not yet started	24/08/2019	0	1	1	1	1	1 No flat	1 x 1 bed	COU	No	BF	0.003
HewW	HewW	440 Malton Road	463554	454909	Rural	16/01622/FUL	21/09/2016	Not yet started	21/09/2019	0	1	1	0	0	1 No detached House	1 x 4 bed	New	Yes (demolish -1)	BF	0.115
Heworth		People Energies Ltd 106 Heworth Green	461517	452748	Urban	16/01625/ORC	16/09/2016	Not yet started	16/09/2021	0	1	1	1	1	1 No semi-detached house	1 x 4 bed	COU	No	BF	0.068
Dring & Wthp		2 Farmands Road	457795	449720	Sub-Urban	16/01719/FUL	13/09/2016	Under Construction	N/A	0	1	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.024
Dring & Wthp		13 Highmoor Road	457742	449878	Sub-Urban	16/01265/FUL	02/11/2016	Under Construction	N/A	0	1	1	1	1	1 No Detached house	1 x 3 bed	New	No	GDN	0.020
Copmanthorpe	Copmanthorpe	Land to R/O 9-11 Tadcaster Road Copmanthorpe	456904	447499	Village	16/01673/FUL	04/11/2016	Under Construction	N/A	0	4	4	4	4	4 no detached houses	2 x 4, 2 x 5 bed	New	No	GDN	0.370
Mick		211 Bishopthorpe Road	460041	450149	Sub-Urban	15/00820/FUL	15/11/2016	Under Construction	N/A	0	1	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.017
Westfld		36 Danesfort Avenue	457551	450662	Sub-Urban	16/01496/FUL	15/11/2016	Under Construction	N/A	0	1	1	1	1	1 No town house	1 x 2 bed	New	No	GDN	0.014
Bishopthorpe	Bishopthorpe	3 Beech Avenue Bishopthorpe	459213	447343	Village	17/00817/FUL	01/06/2017	Not yet started	01/06/2020	0	2	2	2	2	2 No semi-detached houses	2 x 2 bed	New	Yes (demolish -1)	GDN	0.043
Rural W	Upper Pop	Crossfields Main Street Upper Poppleton	455611	454584	Large Village	16/01181/FUL	02/06/2017	Under Construction	N/A	0	3	3	2	2	3 No detached houses	2 x 5, 1 x 6 bed	New	Yes (demolish -1)	GDN	0.154
Clifton		12 Water End	459197	452993	Urban	15/00405/FUL	02/12/2016	Not yet started	02/12/2019	0	1	1	1	1	1 No detached bungalow	1 x 2 bed	New	No	GDN	0.060
Guilhl		26-30 Swingate	460384	451954	City Centre	16/01532/FUL	07/10/2016	Not yet started	07/10/2019	0	8	8	8	8	8 No flats	3 x 1, 5 x 2 bed	COU	No	BF	0.058
Holgate		128 Acomb Road	458099	451433	Urban	16/00680/FUL	04/11/2016	Under Construction	N/A	0	10	10	10	10	10 No flats	6 x 1, 4 x 2 bed	COU/S	No	BF	0.042
Guilhl		51 Huntington Road	460923	452849	Urban	16/01835/FUL	04/11/2016	Not yet started	04/11/2019	0	1	1	1	1	1 No town house	1 x 3 bed	New	No	BF	0.018
Rural W	Askham Br	Brackenhill Askham Bryan Lane Askham Bryan	456117	449308	Rural	18/00061/FUL	28/03/2018	Not yet started	28/03/2021	0	1	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	BF	0.140
Guilhl		Ryedale House 58-60 Piccadilly	460639	451481	City Centre	18/00103/ORC	15/03/2018	Not yet started	15/03/2023	0	79	79	79	79	79 No flats	12 x 1, 51 x 2, 16 x 3 bed	COU	No	BF	0.240
Strensall	Stockton on	Sandburn Farm Malton Road Stockton on Forest	466473	459174	Rural	16/02305/ABC3	15/12/2016	Not yet started	16/12/2021	0	2	2	2	2	2 No detached houses	1 x 3, 1 x 5 bed	COU	No	GF	0.140
Rural W	Hessay	Giebe farm Hessay to Moor Bridge Hessay	451559	453294	Rural	16/02202/FUL	28/11/2016	Not yet started	28/11/2019	0	2	2	2	2	2 No semi-detached houses	2 x 3 bed	New	No	GF	0.120
Rural W	Upper Pop	Dutton Farm Boroughbridge Road	453611	453981	Rural	17/00501/FUL	2017 Won on a	Not yet started	20/11/2020	0	1	1	1	1	1 No detached house	1 x 5 bed	New	No	GF	0.900
Osbaldwick	Dunnington	The Barns Manor Farm Elvington Lane Dunnington	465308	451422	Rural	17/01478/FUL	16/08/2017	Under Construction	N/A	1	3	2	2	2	2 No town houses	2 x 4 bed	COU	No	GF	0.150
Hunt & New Earswick	New Earswick	Land to South of 41 Park Avenue New Earswick	460655	456028	Sub-Urban	17/00200/FUL	25/07/2017	Not yet started	25/07/2020	0	1	1	1	1	1 No detached house	1 x 3 bed	New	No	GF	0.049
Guilhl		Santader 19 Market Street	460340	451795	City Centre	16/01940/FUL	01/12/2016	Not yet started	01/12/2019	0	1	1	1	1	1 No flat	1 x 2 bed	COU	No	BF	0.013
Guilhl		Rowntree Wharf Navigation Road	460835	451729	City Centre	17/01888/FUL	06/12/2016	Under Construction	N/A	28	39	11	11	11	11 No flats	11 x 1 bed	COU	No	BF	0.475
Guilhl		Rowntree Wharf Navigation Road	460835	451729	City Centre	17/01905/FULM	04/12/2017	Under Construction	N/A	0	14	14	14	14	14 No flats	14 x 1 bed	COU	No	BF	
Guilhl		Granville House 21 Granville Terrace	461386	451468	City Centre Ext2	16/02152/FUL	01/12/2016	Under Construction	N/A	0	3	3	3	3	3 No flats	2 x 1, 1 x 2 bed flats	Conv	No	BF	0.015
Guilhl		The Art Shack 4-6 Gillgate	460126	452280	City Centre	15/02517/FUL	08/12/2016	Not yet started	08/12/2019	0	4	4	3	3	4 No flats	2 x 1, 2 x 2 bed	COU/Conv	Yes -1	BF	0.037
Hax & Wig	Haxby	107 York Road Haxby	460841	457472	Large Village	16/01374/FUL	06/01/2017	Under Construction	N/A	0	1	1	0	0	1 No detached house	1 x 3 bed	New	Yes (demolish -1)	BF	0.100
Fulford & H	Fulford	Fishergate County Garage 14 Heslington Lane	460996	449432	Sub-Urban	16/02665/FUL	16/01/2017	Under Construction	N/A	0	1	1	1	1	1 No town house	1 x 4 bed	COU	No	BF	0.022
Wheldrake	Deighton	Springwell Main Street Deighton	462665	444348	Small Village	16/02831/FUL	03/03/2017	Under Construction	N/A	0	1	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	GDN	0.075
Strensall	Earswick	Land Between 121 and 125 Strensall Road	462005	457068	Small Village	15/02950/FUL	06/03/2017	Not yet started	06/03/2020	0	1	1	1	1	1 No detached house	1 x 4 bed	New	No	GDN	0.028
Hunt & New Earswick	New Earswick	39 Park Avenue New Earswick	460678	456048	Sub-Urban	16/01871/FUL	07/03/2017	Under Construction	N/A	0	1	1	1	1	1 No detached bungalow	1 x 2 bed	New	No	GDN	0.032
Bishopthorpe	Bishopthorpe	84 Montague Road Bishopthorpe	459437	447291	Village	16/02861/FUL	08/03/2017	Not yet started	08/03/2020	0	1	1	1	1	1 No detached bungalow	1 x 4 bed	New	No	GDN	0.030
HewW		Garden to R/O 79-85 Stockton Lane	462161	453428	Urban	16/02923/FUL	11/08/2017	Not yet started	11/08/2020	0	9	9	9	9	7 No detached houses, 2 No detached bungalows	2 x 2 bed detached bungalows, 2 x 3, 3 x 3 & 2 x 5 bed detached houses	New	No	GDN	0.590
Raw & Cliff	Clifton Wtd	Proposed Development Site at Clifton Technology Centre	459049	454891	Sub-Urban	16/01533/FUL	18/01/2017	Under Construction	N/A	0	3	3	3	3	3 No town houses	3 x 2 bed	New	No	BF	0.037

Guilhi		Coal Yard 11 Mansfield Street	460990	452131	City Centre Ext 2	17/02702/FULM	15/03/2018	Not yet started	15/03/2021	0	23	23	23	23 No Flats (Clusters)	7 x 1, 3 x 5, 13 x 6 bed	New	No	BF	0.156
Mick		Oliver House Bishophill Junior	459974	451417	City Centre	15/02645/FULM	25/11/2016	Under Construction	N/A	0	34	34	34	34 No flats	5 x 1, 29 x 2 bed	New	No	BF	0.196
Guilhi		G&G Fisheries 64 Clarence Street	460317	452711	Urban	16/01960/FUL	27/01/2017	Under Construction	N/A	0	3	3	2	3 No flats	3 x 1 bed	Conv/New	Yes-1	BF	0.019
Raw & Clift W		The Diocese of York Diocese House Aviator Court	458850	455060	Sub-Urban	17/00083/ORC	17/03/2017	Under Construction	N/A	8	25	17	17	17 No flats	7 x 1, 10 x 2 bed	COU	No	BF	0.350
Hunt & Ne	Huntington	Guilford Construction Ltd 10 Roland Court Huntington	461314	455121	Sub-Urban	16/02747/ORC	28/04/2017	Not yet started	24/04/2022	0	2	2	2	2 No flats	1 x 1, 1 x 2 bed * not confirmed	COU	No	BF	0.007
Raw & Clift Clifton W		British Red Cross 5-6 Marsden Park	459182	454846	Sub-Urban	17/01075/ORC	07/07/2017	Under Construction	N/A	0	4	4	4	4 No flats	TBA	COU	No	BF	0.032
Mick		95-97 Micklegate	459832	451541	City Centre	17/02625/FUL	12/02/2018	Under Construction	N/A	0	6	6	5	6 No flats	2 x 1, 4 x 2 bed	Conv/New	Yes -1	BF	0.023
Hunt & Ne	Huntington	Sunny Lands North Lane Huntington	464324	456410	Rural	16/01561/FUL	03/04/2017	Not yet started	03/04/2020	0	1	1	0	1 No detached house	1 x 4 bed	New	Yes (demolish -1)	BF	0.189
Fulford & H	Heslington	Pool Bridge Farm Wheldrake Lane Cockey Hill	464121	446360	Rural	17/00411/OUT	19/05/2017	Not yet started	19/05/2020	0	1	1	1	1 No detached house	1 x 2 bed	COU	No	GF	0.055
Hunt & Ne	Huntington	25 New Lane Huntington	461804	455516	Sub-Urban	15/02677/FUL	27/06/2017	Not yet started	27/06/2020	0	5	5	5	5 No detached houses	2 x 3 bed, 3 x 4 bed	COU/New	No	GF	0.280
Osbaldwick	Dunnington	Lodge Farm Hull Road Dunnington	468309	451491	Rural	17/01088/FUL	04/07/2017	Not yet started	04/07/2020	0	3	3	3	2 No detached houses, 1 No detached bungalow	2 x 4 bed detached houses, 1 x 2 bed detached bungalow	COU	No	GF	0.481
Clifton		St Raphael Guest House 44 Queen Anne's Road	459724	452497	Urban	17/00331/FUL	04/04/2017	Not yet started	04/04/2020	0	1	1	1	1 No town house	1 x 5+ bed	COU	No	BF	0.013
Copmanthorpe	Copmanthorpe	27 Horseman Lane Copmanthorpe	456403	447226	Village	17/00055/FUL	06/04/2017	Under Construction	N/A	0	1	1	0	1 no detached house	1 x 4 bed	New	Yes (demolish -1)	BF	0.083
Rural W	Askham Bryan	110 Main Street Askham Bryan	454943	448369	Small Village	17/00718/FUL	25/05/2017	Not yet started	25/05/2020	0	1	1	0	1 No detached house	1 x 5 bed	New	Yes (demolish -1)	BF	0.205
Guilhi		Pizza Hut Ltd 10 Pavement	460479	451774	City Centre	17/00835/FUL	09/06/2017	Not yet started	09/06/2020	0	8	8	8	8 No flats	8 x 1 bed	COU	No	BF	0.029
Raw & Clift Clifton W		Buildmark House George caley Drive	459205	454817	Sub-Urban	17/00732/FUL	09/06/2017	Not yet started	09/06/2020	0	8	8	8	8 No flats	4 x 1, 4 x 2 bed	New	No	BF	0.113
Clifton		24 Filey Terrace	460122	453206	Urban	17/00909/FUL	13/06/2017	Under Construction	N/A	0	2	2	1	2 No flats	1 x 1, 1 x 2 bed	Conv	Yes -1	BF	0.008
Dring & Wthp		Aldersyde House Aldersyde	458345	449101	Sub-Urban	16/02511/FUL	14/06/2017	Not yet started	14/06/2020	0	2	2	2	2 No town houses	2 x 2 bed	Conv	Yes -1	BF	0.062
Guilhi		Hill Giftware Ltd 46 Goodramgate	460462	452098	City Centre	17/00321/FUL	19/06/2017	Not yet started	19/06/2020	0	1	1	1	1 No flat	1 x 3 bed	COU	No	BF	0.008
Fisher		134 Lawrence Street	461610	451316	City Centre Ext 2	17/01045/FUL	20/06/2017	Not yet started	20/06/2020	0	2	2	2	2 No flats	2 x 2 bed	Conv	No	BF	0.027
Dring & Wthp		5 Mayfield Grove	458745	449814	Urban	16/00725/FUL	11/07/2017	Not yet started	11/07/2020	0	3	3	2	2 No semi-detached houses, 1 No detached bungalow	2 x 3 bed semi-detached houses and 1 x 2 bed detached bungalow	New	Yes (demolish -1)	GDN	0.061
Westfld		61a Gale Lane	457284	450825	Sub-Urban	17/00555/FUL	31/08/2017	Not yet started	31/08/2020	0	7	7	6	5 No flats, 2 No semi-detached bungalows	5 x 1 bed flats, 2 x 2 bed semi-detached bungalows	New	Yes (demolish -1)	GDN	0.094
Dring & Wthp		11 Highmoor Road	457759	449850	Sub-Urban	17/01435/FUL	18/08/2017	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 2 bed	New	No	GDN	0.019
Strensall	Stockton on Forest	Laurel House The Village Stockton on Forest	465629	455898	Small Village	17/00726/FUL	29/09/2017	Not yet started	29/09/2020	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.111
Hax & Wg	Haxby	87 Greenshaw Drive Haxby	460547	457924	Large Village	17/01697/FUL	06/10/2017	Under Construction	N/A	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.021
Guilhi		Hilary House St Saviours Place	460665	451993	City Centre	16/00701/FUL	22/06/2017	Not yet started	22/06/2020	0	1	1	1	1 No flat	1 x 3 bed	Conv	No	BF	0.110
Mick		198 Mount Vale	459193	450768	Urban	17/00716/FUL	30/06/2017	Not yet started	30/06/2020	0	1	1	1	1 No flat	1 x 1 bed	Conv	No	BF	0.010
Fulford & H	Fulford	Cemetery Lodge Fordlands Road	461279	448653	Rural	17/00861/FUL	25/07/2017	Not yet started	25/07/2020	0	1	1	0	1 No flat	1 x 1 bed	COU/Conv	No	BF	0.050
Guilhi		G&G Fisheries 64 Clarence Street	460335	452740	Urban	17/01237/FUL	26/07/2017	Under Construction	N/A	0	2	2	2	2 No flats	2 x 1 bed	New	No	BF	0.010
Wheldrake	Elvington	Home Lea Elvington Lane Elvington	467908	448792	Rural	17/00712/FUL	18/08/2017	Under Construction	N/A	0	1	1	1	1 No detached bungalow	1 x 2 bed	COU	No	BF	0.075
Clifton		Bedingham & Co 1b Newborough Street	459965	452903	Urban	17/01600/FUL	25/08/2017	Not yet started	25/08/2020	0	2	2	2	2 No flats	2 x 1 bed	COU	No	BF	0.014
Strensall	Stockton on Forest	Garage at 30 The Limes Stockton on Forest	465422	455752	Small Village	17/01418/FUL	25/08/2017	Not yet started	25/08/2020	0	1	1	1	1 No detached bungalow	1 x 2 bed	New	No	BF	0.030
Strensall	Stockton on Forest	Hermitage Farm House Malton Road Stockton on Forest	465208	457733	Rural	17/01016/FUL	31/08/2017	Not yet started	31/08/2020	0	1	1	0	1 No detached house	1 x 4 bed	New	Yes (demolish -1)	BF	0.150
Guilhi		12 Castlegate	460398	451619	City Centre	17/01562/FUL	04/09/2017	Under Construction	N/A	0	3	3	-6	3 No town houses	2 x 3, 1 x 5 bed	Conv	Yes - 9	BF	0.024
Fulford & H	Fulford	Former Saxon House 71-73 Fulford Road	460813	450842	Urban	15/02888/FUL	14/09/2017	Under Construction	N/A	0	10	10	10	10 No flats	5 x 1, 4 x 2, 1 x 3 bed	COU	No	BF	0.053
Bishopthorpe	Bishopthorpe	Cavendish Jewellers Ltd Garth Cottage Sim Balk Lane	459095	447979	Rural	17/01182/FUL	11/08/2017	Not yet started	11/08/2020	0	1	1	1	1 No detached house	1 x 3 bed	COU	No	BF	0.070
Guilhi		First Floor Flat 24 Gillygate	460160	452324	City Centre	17/01451/FUL	20/09/2017	Not yet started	20/09/2020	0	3	3	2	3 No flats	1 x 1, 2 x 2 bed	Conv	Yes -1	BF	0.027
Clifton		2 Ratcliffe Street	459977	453314	Urban	17/01787/FUL	26/09/2017	Not yet started	26/09/2020	0	1	1	1	1 No detached bungalow	1 x 1 bed	New	No	BF	0.006
Westfld		Wards Newsagents 45 York Road Acomb	457664	451436	Urban	17/01608/FUL	29/09/2017	Under Construction	N/A	1	3	2	2	2 No flats	2 x 1 bed	Conv	Yes -1	BF	0.012
Guilhi		Monkgate Guest House 65 Monkgate	460786	452476	City Centre	17/01596/FUL	03/10/2017	Not yet started	03/10/2020	0	1	1	1	1 no town house	1 x 6 bed	COU	No	BF	0.010
Fisher		Alma House 15 Alma Terrace	460764	450524	Urban	17/01763/FUL	31/10/2017	Not yet started	31/10/2020	0	7	7	6	7 No flats	1 x 1, 6 x 2 bed	COU/Conv	Yes -1	BF	0.041

Guilth		The Fleeting Arms 54 Gillygate	460219	452399	City Centre	17/00580/FULM	06/10/2017	Under Construction	N/A	0	18	18	17	18 No flats (studio units)	18 x 1 bed	COU/Conv	Yes -1	BF	0.072
Westfld		83 Green Lane Acomb	457646	451081	Urban	17/00884/FUL	06/10/2017	Not yet started	06/10/2020	0	4	4	3	1 No detached house, 2 No semi-detached houses, 1 No detached bungalow	1 x 2 bed detached bungalow, 1 x 2 bed detached bungalow	New	Yes (demolish -1)	GDN	0.098
Westfld		24 Kir Crescent	457372	451034	Sub-Urban	17/01440/FUL	10/10/2017	Not yet started	10/10/2020	0	1	1	1	1 No town house	1 x 2 bed	New	No	GDN	0.017
Holgate		9 Holly Bank Grove	458703	450739	Urban	17/01912/FUL	06/11/2017	Not yet started	06/11/2020	0	1	1	1	1 No town house	1 x 3 bed	New	No	GDN	0.020
Hunt & Ne	Huntington	Arabesque House Monks Cross Drive Huntington	462443	455162	Sub-Urban	17/01369/ORC	31/07/2017	Not yet started	31/07/2022	0	56	56	56	56 No flats	54 x 1, 2 x 2 bed	COU	No	BF	0.183
Guilth		Smiths Gore 48 Bootham	459955	452355	City Centre	17/01541/ORC	17/08/2017	Not yet started	17/08/2022	0	11	11	11	11 No flats	11 x 2 bed	COU	No	BF	0.118
Raw & Cliff	Clifton W	Environment Agency Coverdale House Aviator Court	458892	454985	Sub-Urban	18/00172/ORC	02/10/2017	Not yet started	02/10/2020	0	34	34	34	34 No flats	34 x 1 bed	COU	No	BF	0.484
Raw & Cliff	Clifton W	Home Housing Association Ltd 131 Brailford Crescent	459435	453903	Urban	17/02119/FUL	08/11/2017	Not yet started	08/11/2020	0	2	2	2	2 No flats	2 x 1 bed	COU	No	BF	0.026
Mick		The Falcon Tap 94 Micklegate	459842	451594	City Centre	17/01468/FULM	13/11/2017	Not yet started	13/11/2020	0	11	11	10	11 No flats	10 x 1, 1 x 3 bed	Conv/New	Yes -1	BF	0.041
Guilth		Rear of 25 Bootham	460080	452317	City Centre	17/01445/FUL	15/11/2017	Not yet started	15/11/2020	0	8	8	8	8 No flats	5 x 1, 3 x 2 bed	New	No	BF	0.043
Rural W	Skelton	Woodstock Lodge Corban Lane Wigginton	456123	459074	Rural	17/01702/FUL	17/11/2017	Not yet started	17/11/2020	0	1	1	0	1 No detached house	1 x 6 bed	Conv	Yes -1	BF	0.500
Mick		4 Bridge Street	460163	451623	City Centre	17/01816/FUL	24/11/2017	Not yet started	24/11/2020	0	1	1	1	1 No Flat	1 x 2 bed	COU	No	BF	0.008
Mick		Holmea Guest House 6 Southlands Road	460032	450734	Urban	17/01257/FUL	28/11/2017	Not yet started	28/11/2020	0	1	1	1	1 No town house	1 x 5 bed	COU	No	BF	0.009
Guilth		Bank of Scotland 6 Nessgate	460328	451657	City Centre	17/02451/ORC	11/12/2017	Not yet started	11/12/2022	0	16	16	16	16 No flats	16 x 1 bed	COU	No	BF	0.041
Guilth		23 Piccadilly	460662	451543	City Centre	17/02624/ORC	28/12/2017	Not yet started	28/12/2022	0	24	24	24	24 No flats	9 x 1, 15 x 2 bed	COU	No	BF	0.107
Guilth		Yh Training Services Ltd York House 15 Clifford Street	460370	451583	City Centre	17/02925/ORC	05/02/2018	Not yet started	05/02/2023	0	4	4	4	4 no flats	4 x 2 bed	COU	No	BF	0.026
Raw & Cliff	Clifton W	Land to West of Block D Aviator Court	458918	455075	Sub-Urban	17/03067/FUL	05/03/2018	Not yet started	05/08/2021	0	6	6	6	6 No flats	4 x 1, 2 x 2 bed	New	No	BF	0.133
Osbaldwick	Osbaldwick	Land to South of 78 Osbaldwick Lane	462993	451696	Sub-Urban	17/01800/FUL	17/11/2017	Not yet started	17/11/2020	0	1	1	1	1 No detached bungalow	1 x 3 bed	New	No	GDN	0.040
Heworth Without		7 Woodlands Grove	462134	453241	Urban	17/01890/FUL	17/11/2017	Not yet started	17/11/2020	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.020
Hunt & Ne	Huntington	1 Meadow Way Huntington	461869	455736	Sub-Urban	17/02397/FUL	30/11/2017	Not yet started	30/11/2020	0	1	1	1	1 No detached bungalow	1 x 2 bed	New	No	GDN	0.019
Westfld		21 Stirrup Close	456774	449898	Sub-Urban	17/01453/FUL	01/12/2017	Not yet started	01/12/2020	0	1	1	1	1 No town house	1 x 3 bed	New	No	GDN	0.012
Rural W	Upper Pop	49 Station Road Upper Poppleton	455940	453665	Large Village	17/02143/FUL	30/11/2017	Under Construction	N/A	0	1	1	0	1 No detached bungalow	1 x 3 bed	New	Yes -1	GDN	0.095
Guilth		Proposed Hotel 46-50 Piccadilly (Residential Part of Sch)	460615	451538	City Centre	17/00429/FULM	18/12/2017	Not yet started	18/12/2020	0	8	8	8	8 No flats	8 x 2 bed	New	No	BF	0.067
Fulford & H	Heslington	Little Hall Main Street Heslington	462764	450243	Sub-Urban	17/01867/FUL	20/12/2017	Not yet started	20/12/2020	0	1	1	1	1 No town house	1 x 3 bed	Conv	No	BF	0.184
Mick		Swinton Insurance 1 Bishopthorpe Road	460171	451066	Urban	17/02575/FUL	20/12/2017	Not yet started	20/12/2020	0	1	1	1	1 No flat	1 x 2 bed	COU	No	BF	0.073
Westfld		71 Green Lane Acomb	457650	451025	Urban	17/02293/FUL	08/12/2017	Under Construction	N/A	0	1	1	1	1 No flat	1 x 2 bed	COU	No	BF	0.096
Clifton		Doctors Surgery 32 Clifton	459619	452725	Urban	17/02290/FUL	10/01/2018	Not yet started	10/01/2021	0	2	2	2	2 No town houses	2 x 1 bed	COU	No	BF	0.012
Guilth		Fiesta Latina 14 Clifford Street	460335	451555	City Centre	17/02224/FUL	12/01/2018	Not yet started	12/01/2021	0	10	10	10	10 No flats	4 x 1, 6 x 2 bed	COU	No	BF	0.037
Clifton		Archbishop Holgate Boathouse Sycamore Terrace	459504	452136	Urban	17/02717/FUL	12/01/2018	Not yet started	12/01/2021	0	1	1	1	1 No detached house	1 x 4 bed	New	No	BF	0.060
Mick		20 Priory Street	459897	451451	City Centre	17/01238/FUL	15/01/2018	Not yet started	15/01/2021	0	2	2	1	2 No flats	2 x 1 bed	New	Yes (demolish -1)	BF	0.010
Heworth		Heworth Court Hotel 76 Heworth Green	461405	452725	Urban	17/02492/FUL	01/02/2018	Not yet started	01/02/2021	0	2	2	2	2 No town houses	2 x 4 bed	COU	No	BF	0.122
Clifton		338 Burton Stone Lane	460122	453949	Urban	17/02798/FUL	02/02/2018	Not yet started	02/02/2021	0	1	1	1	1 No detached bungalow	1 x 2 bed	New	No	GDN	0.021
Osbaldwick	Dunnington	The Ridings 95 York Street Dunnington	466499	452324	Village	16/02663/FUL	8/2/18 Won on Appeal	Not yet started	08/02/2021	0	1	1	1	1 no detached bungalow	1 x 2 bed	New	No	GDN	0.037
Strensall	Stockton on Forest	Whitcroft Sandy Lane Stockton on Forest	466056	456506	Small Village	17/02292/FUL	12/02/2018	Not yet started	12/02/2021	0	1	1	1	1 No detached house	1 x 3 bed	New	No	GDN	0.055
Dring & Wthp		26 Tadcaster Road Dringhouses	458759	449783	Urban	15/02726/FULM	09/03/2018	Not yet started	09/03/2021	0	11	11	11	3 No detached houses, 2 No detached bungalows, 6 No town houses	2 x 4, 1 x 5 bed detached houses, 2 x 3 bed detached bungalows, 6 x 3 bed town houses	New	No	GDN	0.520
Copmanthorpe	Copmanthorpe	Land to R/O 15 Tadcaster Road Copmanthorpe	456867	447475	Village	17/03069/FUL	15/03/2018	Not yet started	15/03/2021	0	1	1	1	1 No detached house	1 x 5 bed	New	No	GDN	0.120
Guilth		Abbeyfield Veterinary Centre 49 Clarence Street	460271	452713	Urban	17/02739/FUL	06/02/2018	Not yet started	06/02/2021	0	2	2	2	2 no flats (student cluster units)	2 x 10 bed (cluster units)	COU	No	BF	0.040
Rural W	Askham RA	Askham Fields Farm York Road Askham Richard	453306	447595	Rural	17/02997/FUL	08/02/2018	Not yet started	08/02/2021	0	2	2	0	1 No detached house & 1 No flat	1 x 4 bed detached house, 1 x bed flat	New	Yes (demolish -2)	BF	0.280
Guilth		93 Union Terrace	460289	452802	City Centre	17/00722/FUL	12/02/2018	Not yet started	12/02/2021	0	2	2	1	2 No flats	2 No flats	Conv	Yes (-1)	BF	0.017
Guilth		Grove House 40-48 Penneys Grove Street	460593	452567	Urban	17/01129/FULM	13/02/2018	Not yet started	13/02/2021	0	32	32	32	32 No Flats	28 x 1, 1 x 2, 3 x 3 bed	COU	No	BF	0.250
Holgate		107 Carr Lane	457619	451885	Sub-Urban	17/02973/FUL	14/02/2018	Not yet started	14/02/2021	0	5	5	4	5 No flats	4 x 1, 1 x 2 bed	Conv	Yes (-1)	BF	0.028

Osbaldwick	Holtby	Sycamore Cottage Main Street Holtby	467385	454304	Small Village	17/02966/FUL	15/02/2018	Not yet started	15/02/2021	0	1	1	1	1	1 no detached bungalow	1 x 2 bed	Conv	No	BF	0.170
Guilth		The Jorvik Hotel 52 Marygate	459821	452189	City Centre	17/02250/FUL	23/02/2018	Not yet started	23/02/2021	0	2	2	2	2	2 No town houses	2 x 5+ bed	New	No	BF	0.077
Fisher		1B Wolsley Street	461167	451125	City Centre Ext 2	17/03024/FUL	27/02/2018	Not yet started	27/02/2021	0	1	1	1	1	1 No flat	1 x 2 bed	COU	No	BF	0.008
Westfld		HSBC 19 York Road Acomb	457768	451456	Urban	17/02912/RFP	15/03/2018	Not yet started	15/03/2023	0	1	1	0	0	1 No town house	1 x 4 bed	COU/Conv	Yes (-1)	BF	0.034
Heworth		81 Fifth Avenue	461423	452107	Urban	18/00058/FUL	12/03/2018	Not yet started	12/03/2021	0	2	2	1	2	2 No town houses	2 x 2 bed	Conv	Yes (-1)	BF	0.029
Guilth		147 Lawrence Street	461673	451359	City Centre Ext 2	17/03063/FUL	26/03/2018	Not yet started	26/03/2021	0	4	4	3	4	4 No flats	1 x 1, 3 x 2 bed	Conv	Yes (-1)	BF	0.017
Fulford & H Fulford		Adams House Hotel 5 main Street Fulford	460922	449602	Urban	16/02737/FUL	08/03/2017	Not yet started	08/03/2020	0	1	1	1	1	1 No detached house	1 x 5+ bed	COU	No	BF	0.065

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Skelt/Raw & ClifW	Clifton Without	The Grain Stores Water Lane	459367	454429	Urban/sub-urban	15/00121/REM	12/05/2015	Under Construction	N/A	122	215	93	93	44	44 No detached houses, 10 No semi-detached houses, 39 No Town Houses	4 bed semi-detached houses, 5 x 2, 27 x 3, 4 x 4, 3 x 5 bed town houses	New	No	BF	6.000
Mick		Former Terrys Factory Bishopthorpe Road Phase II	459961	449909	Urban	14/01716/FUL	24/02/2015	Under Construction	N/A	41	230	189	189	150	150 No flats, 7 No detached houses, 32 No town houses	2 x 3, 5 x 4 bed detached houses, 5 x 2, 27 x 3, 16 x 1, 134 x 2 bed flats	New	No	BF	
Mick		Former Terrys Factory Bishopthorpe Road Phase III	459961	449909	Urban	15/00456/FUL	22/07/2015	Under Construction	N/A	161	163	2	2	2	2 No flats	2 x 2 bed	COU	No	BF	
Fulfrd		Germany Beck Site East of Fordlands Road	461663	449121	Sub-Urban	12/00384/REMN	09/05/2013	Under Construction	N/A	0	655	655	655	houses, 25 No detached bungalows, 197 Town houses, 76 No flats	houses, 25 No detached bungalows, 197 Town houses, 25 x 2 bed detached bungalows, 150	New	No	GF	16.600	
Osbaldwick	Osbaldwick	(Phase 3 & 4) Land to West of Metcalfe Lane Osbaldwic	462913	452260	Sub-Urban	12/01878/REMN	13/03/2013	Under Construction	N/A	189	299	110	110	houses, 2 No detached bungalows, 2 No semi-detached bungalows, 65 No town houses, 24 No flats	x 4 bed semi-detached houses, 6 x 2 bed semi detached bungalows, 40 x 3 & 9 x 4 bed	New	No	GF		
Osbaldwick	Osbaldwick	(Phase 4 - amended) Land to West of Metcalfe Lane Os	462913	452260	Sub-Urban	16/00342/FULM	18/11/2016	Under Construction	N/A	0	36	36	36	4 No detached houses, 10 No semi-detached houses, 22 No town houses	bed semi-detached houses, 18 x 3, 4 x 4 bed town houses	New	No	GF		
Guilth		Hungate Development Site (Blocks D, F, & H)	460784	451839	City Centre	15/01709/OUTM	18/07/2006	Not yet started	N/A	0	466	466	466	662 No flats (Block D = 186 Flats, Block F = 101 flats, Block H = 179 flats)	both reserved matters (Block D: 97 x 1, 81 x 2, 8 x 3 bed and Block F: 52 x 1, 35 x 2 and 14 x	New	No	BF	4.100	
Guilth		Hungate Development Site (Block G)	460784	451839	City Centre	17/03032/REMN	19/02/2018	Not yet started	20/12/2020	0	196	196	196	196 Flats	129 x 1, 67 x 2 bed	New	No	BF		
Fishergate		St Josephs Convent of Poor Clare Collentines Lawrence	461372	451321	City Centre Ext 2	14/02404/FULM	09/03/2015	Under Construction	N/A	526	542	16	15	16	16 No flats	15 x 1, 1 x 3, bed clusters	New/COU	Yes -1	BF	2.560
Fulford & H Fulford		Royal Masonic Benevolent Institute Connaught Court St	460688	449521	Sub-Urban	13/03481/FULM	13/06/2016	Not yet started	13/06/2019	0	14	14	14	14 No detached houses	2 x 4, 8 x 5, 4 x 6 bed	New	No	GF	1.100	
Fishergate		York Barbican Paragon Street	460848	451211	City Centre Ext 2	13/02135/FULM	24/08/2017	Not yet started	24/08/2020	0	187	187	187	187 No flats	57 x 1, 130 x 2 bed	New	No	BF	0.960	
Guilth		The Cocoa Works Haxby Road	460535	453542	Urban	17/00284/FULM	14/09/2017	Not yet started	14/09/2020	0	258	258	258	258 Flats	37 x 1, 205 x 2, 16 x 3 bed	COU	No	BF	2.350	

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	Housing Allocation Site
	Greenfield Site
	Garden Infill Site
	ORC - Office Residential Conversion
	Student Accommodation
	Retirement Living Accommodation

Appendix 5

Draft Plan Allocations Trajectory

Appendix 2

Housing Allocations Trajectory

Ref	Site	Site Area	Yield	Timing	Density	Years 1 to 5	Years 6-10	Years 11-15	Years 16-21
H1	Former Gas Works, 24 Heworth Green (Phase 1)	2.87	271	Short Term (Years 1 -5)	94.43	271			
H1	Former Gas works, 24 Heworth Green (Phase 2)	0.67	65	Medium Term (Years 6-10)	97.01	65			
H3	Burnholme School	1.90	72	Short Term (Years 1 -5)	37.89	72			
H5	Lowfield School	3.64	162	Short to Medium term (Years 1 -10)	44.51	80	82		
H6	Land R/O The Square Tadcaster Road	1.53	0	Short to Medium Term (Years 1 -10)	0.00				
H7	Bootham Crescent	1.72	86	Short to Medium Term (Years 1 -10)	50.00	46	40		
H8	Askham Bar Park & Ride	1.57	60	Short Term (Years 1 -5)	38.22	60			
H10	The Barbican	0.96	187	Short Term (Years 1 -5)	194.79	187			
H20	Former Oakhaven EPH	0.33	56	Short Term (Years 1 -5)	169.70	56			
H22	Former Heworth Lighthouse	0.29	15	Short Term (Years 1 -5)	51.72	15			
H23	Former Grove House EPH	0.25	11	Short Term (Years 1 -5)	44.00	11			
H29	Land at Moor Lane Copmanthorpe	2.65	88	Short to Medium Term (Years 1 -10)	33.21	88			
H31	Eastfield Lane Dunnington	2.51	76	Short to Medium Term (Years 1 -10)	30.28	76			
H38	Land RO Rufforth Primary School Rufforth	0.99	33	Short to Medium Term (Years 1 -10)	33.33	33			
H39	North of Church Lane Elvington	0.92	32	Short to Medium Term (Years 1 -10)	34.78	32			
H46	Land to North of Willow Bank and East of Haxby Road, New Earswick	2.74	104	Short to Medium Term (Years 1 -10)	37.96	104			
H52	Willow House EPH, Long Close Lane	0.20	15	Short Term (Years 1 -5)	75.00	15			
H53	Land at Knapton Village	0.33	4	Short Term	12.12	4			
H55	Land at Layerthorpe	0.20	20	Short Term (Years 1 -5)	100.00	20			
H56	Land at Hull Road	4.00	70	Short Term (Years 1 -5)	17.50	70			
H58	Clifton Without Primary School	0.70	25	Short Term (Years 1 -5)	35.71	25			
H59	Queen Elizabeth Barracks – Howard Road, Strensall			Short to Medium term (Years 1 -10)					
ST1	British Sugar/Manor School	46.30	1200	Lifetime of the Plan (Years 1-16)	25.92	0	600	600	
ST2	Former Civil Service Sports Ground Millfield Lane	10.40	266	Short to Medium Term (Years 1 -10)	25.58	166	100		
ST4	Land adj. Hull Road & Grimston Bar	7.54	211	Short to Medium Term (Years 1 -10)	27.98	111	100		
ST5	York Central	35.00	1700	Lifetime of the Plan and Post Plan period (Years 1-21)	48.57	0	500	600	600
ST7	Land East of Metcalfe Lane	34.50	845	Lifetime of the Plan (Years 1 -16)	24.49	200	295	350	
ST8	Land North of Monks Cross	39.50	968	Lifetime of the Plan (Years 1 -16)	24.51	250	300	418	
ST9	Land North of Haxby	35.00	735	Lifetime of the Plan (Years 1 -16)	21.00	150	285	300	
ST14	Land to West of Wigginton Road	55.00	1348	Lifetime of the Plan and Post Plan period (Years 1 -21)	24.51	200	400	400	348
ST15	Land to West of Elvington Lane	159.00	3339	Lifetime of the Plan and Post Plan period (Years 1 -21)	21.00	300	900	900	900
ST16	Terrys Extension Site – Terry's Clock Tower (Phase 1)	2.18	22	Short to Medium Term (Years 1-5)		22			
ST16	Terry's Extension Site – Terry's Car Park (Phase 2)		33	Short to Medium Term (Years 1 – 10)			33		
ST16	Terry's Extension Site – Land to rear of Terry's Factory (Phase 3)		56	Short to Medium Term (Years 1 – 10)			56		
ST17	Nestle South (Phase 1)	2.35	263	Short to Medium Term (Years 1 -10)	111.91	100	163		
ST17	Nestle South (Phase 2)	4.70	600	Medium to Long Term (Years 6 – 15)	127.66		300	300	
ST31	Land to the South of Tadcaster Road, Copmanthorpe	8.10	158	Short to Medium Term (Years 1-10)	19.51	50	108		
ST32	Hungate (Phases 5+)	2.17	328	Short to Medium Term (Years 1-10)	151.15	128	200		
ST33	Station Yard, Wheldrake	6.00	147	Short to Medium Term (Years 1-10)	24.50	47	100		
ST35**	Queen Elizabeth Barracks, Strensall	28.80		Medium to Long Term (Years 6-15)	0.00				
ST36**	Imphal Barracks, Fulford Road	18.00	769	Post Plan period (Years 16-21)	42.72				600
		525.51	14440			3054	4562	3868	2448

