

**CITY OF YORK LOCAL
PLAN EXAMINATION
HEARING STATEMENT**

**MATTER 2 - HOUSING
STRATEGY: SPATIAL
DISTRIBUTION**

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1.0 INTRODUCTION

- 1.01. The following hearing statement is made for and on behalf of L&Q Estates (L&QE). This statement responds to selected questions set out within Matter 2: The Housing Strategy: spatial distribution of housing of the Inspector's Matters, Issues and Questions and Matters 2.8 – 2.10 in particular.
- 1.02. The Inspector's Issues and Questions are included in bold for ease of reference. Where a specific Question is not covered L&QE has no comment as part of this hearing statement. Turley has covered Matters 2.1 – 2.7 in respect of the housing market area, OAN and the housing requirement.
- 1.03. This hearing statement is pursuant to and cross-references with previous representations by Carter Jonas and Turley in respect of the Pre-Publication Draft (Regulation 18) and Main Modifications (Regulation 19) consultations in July 2019.

2.0 MATTERS, ISSUES AND QUESTIONS RESPONSES

MIQ 2.8: The Housing Strategy: Spatial Distribution

- 2.01 In broad terms we consider the spatial strategy identified within Policy SS1 to be in line with the sustainability objectives of the NPPF (paragraphs 7 – 16) and consider that the five spatial principles set out within this policy will help to provide a focus for the location of development. However, more clarity on how housing growth should be distributed is required.
- 2.02 It is interesting to note that the wording of the five spatial principles remains unchanged from the 2014 draft plan but the focus of delivery and distribution has shifted toward freestanding new settlements (“garden villages”) and higher densities on previously developed land.
- 2.03 As it stands, we are concerned that due to heavy reliance on major regeneration sites and garden villages as a preference over the release of more green belt land from the inner boundary for sustainable urban housing allocations, the Plan as proposed will not deliver the most sustainable growth strategy that Policy SS1 seeks to achieve. A more detailed approach to the location of housing growth would form part of a more appropriate spatial strategy.

MIQ 2.9a

- 2.04 Policy SS1 does not articulate the overall spatial distribution strategy of new housing proposed through the Plan. This is a fundamental absence and which must be addressed. The Key Diagram identifies Strategic Sites only and excludes all of the other housing sites, as listed at Table 5.1 within the housing chapter. These Strategic Sites are comprised of sites for housing and employment or a mix of the two. The distribution of new housing across the City of York is therefore not clear from the Key Diagram.

MIQ 2.9b

- 2.05 The level of housing directed towards the City Centre and other parts of the Plan Area is not clearly identified within the plan. Policy SS3 which relates to York City Centre identifies sites ST32, ST20 and ST5 for allocation however there is no clearly identified figure for new housing in the city centre within this policy either. For example, the plan does not make clear how much of the estimated yield for ST5: York Central will be within the land falling within the designated city centre boundary or the larger part of the allocation, to the west. Furthermore, it does not identify how much of the 1,700 total would be delivered beyond the plan period.
- 2.06 The level of housing within other parts of the Plan Area is not clearly identified within Policy SS1 nor is it clearly identified within other policies within the Plan.

MIQ 2.9c

2.07 Paragraphs 3.4 – 3.12 of the Publication Draft cover Factors Which Shape Growth and refer to the technical information in relation to The Character and Setting of the City, Green Infrastructure, Nature Conservation, Green Corridors and Open Space, Nature Conservation and Flood Zones which the Council has relied upon to inform the distribution of growth. However there is no clear justification for the proposed distribution that has been arrived at (as represented by the Strategic Sites) within this evidence.

2.08 Once a robust OAN and housing land requirement have been arrived at and the amount of green belt release understood, the spatial distribution criteria and the previous growth options as considered at the Preferred Options stage should be revisited:

- *Option 1: Prioritise development within and/or as an extension to the urban area and through the provision of a single new settlement;*
- *Option 2: Prioritise development within and/or as an extension to the urban area and through provision in the villages subject to levels of services;*
- *Option 3: Prioritise development within and/or as an extension to the urban area and through the provision of new settlements;*
- *Option 4: Prioritise development within and/or as an extension to the urban area along key sustainable transport corridors.*

2.09 We consider that Option 2 represents one element of a more appropriate spatial strategy compared to the spatial distribution as reflected by the proposed Strategic Sites.

MIQ 2.9d

2.10 The distribution of development is not consistent with the overall approach set out in Policy SS1. As mentioned above the identification of garden villages as a preference over the release of potentially more sustainable urban extension sites within the York Outer Ring Road (such as our client's site at North Field) is not a sustainable option and demonstrates the flaws within the Council's retrospective approach to the location of development throughout the plan.

2.11 We cross-refer to the Turley report dated July 2019: Proposed Modifications to the York Local Plan: OAN Critique. Not only does the report challenge the unreasonably low OAN proposed by the Council, it also indicates that, based on the split of existing dwellings across the city, a split on 84% houses to 16% flats/apartments is necessary to deliver the type and size of homes "needed across all tenures in the 2016 SHMA".

2.12 We are concerned that the Strategic Sites and some of the higher densities that are necessary to help meet even the proposed OAN of 790dpa will not deliver sufficient family housing in sustainable locations. This will be

in breach of the Policy SS1 aims and objectives of “addressing the housing and community needs of York’s current and future population.

MIQ 2.9e

- 2.13 We consider that the Sustainability Appraisal does not support the proposed distribution of housing as there are a range of negative and significant negative effects that have been identified for a number of the ‘garden villages’ (or stand-alone settlements). For example ST15 scores poorly overall with 4 of the Objectives Scoring as significant negative effects (SA02, SA03, SA10, SA013), two as significant/negative effects (SA014 and SA015), one as negative effect (SA08), two as no significant effect/clear link to policy (SA04) and SA012), two as depends upon Policy implementation (SA05 and SA06), one as negative/positive effect (SA09), one as a positive effect (SA07) and once as significant positive effect (SA1).
- 2.14 The scoring therefore implied that the only clear significant positive effect from the development of ST15 as a stand-alone settlement would be that it would assist in meeting the housing needs of York in a sustainable way. How sustainable a development on greenfield land, detached from the main urban area with no services or facilities would actually be is debatable given the negative effect identified within the Sustainability Appraisal scoring.
- 2.15 It is also clear that there is flaws with the scoring of the Sustainability Appraisal as there are various scores which underplay the significance of the effect of a number of the ‘garden villages’ such as ST7, ST14 and ST15. For example the majority of ST15 (just over two thirds) is greenfield and there will be a significant negative effect from the loss of this land (SA09) whereas it has been scored as likely to have a positive effect and also a negative effect on SA objectives. We assume that this is due to the site including an element of the Elvington Airfield brownfield site. In relation to SA Objective 06 Access to Transport, the site scores “1 – depends upon Policy implementation”. This should be identified as a significant negative effect as at present there are no frequent bus services, or access to train services with walking/cycling distance.
- 2.16 Overall it is considered that the distribution of housing identified within the Plan will not lead to the most sustainable pattern of housing growth. As mentioned above, the allocation of ‘garden villages’ such as ST14 in preference to the release of more sustainable urban extensions adjacent to existing settlements (for example, land at North Field between the York Outer Ring Road at Poppleton and the edge of Acomb) is not the most sustainable approach to future development. This represents a reasonable alternative that has not evidently tested within the Sustainability Appraisal.

MIQ 2.9f

- 2.17 As set out in our Matter 3 statement, we consider that, whilst the Council has undertaken a Green Belt review (Topic Paper 1: Approach to Defining York’s Green Belt plus 2019 Addendum), the approach taken has been based on a collection of evidence which is largely out of date, going back as far as 2003 and lacking a common

and robust methodology. Given a city like York where almost all of the undeveloped land is within the General Extent of Green Belt we consider that a robust green belt review can only be undertaken when an accurate OAN and housing land requirement are in place. Only then can the amount of land needed to be released from the green belt for housing and as safeguarded land be fully understood.

- 2.18 We consider that the distribution of housing has been significantly influenced by the green belt review and the over-emphasis placed on the council on preserving the historic character of York, and does not fully appreciate or make the most of more sustainably located sites. In summary, green belt protection and restraint have been evidently prioritised over growth. This has led to the need to increase housing densities for allocations on previously developed land and a move away from urban extension allocations on the inner edge of the green belt to free-standing new settlements.
- 2.19 In respect of “other constraints” and as mentioned above, paragraphs 3.4 – 3.12 of the Publication Draft refer to technical information in relation to The Character and Setting of the City, Green Infrastructure, Nature Conservation, Green Corridors and Open Space, Nature Conservation and Flood Zones which the Council has relied upon to inform the distribution of growth.

MIQ 2.10

- 2.20 The testing and identification of a spatial distribution strategy and identification of suitable sites for allocation should be done through a robust iterative process, taking account of constraints, a Sustainability Appraisal testing various options and sites, and a comprehensive and clear Green Belt review, amongst other pieces of evidence. This process has not clearly been followed or it is unclear to unpick this from the evidence to demonstrate the proposed identification of sites is the most appropriate strategy.
- 2.21 Given the above comments, it is clear that there is no clearly articulated spatial distribution strategy for housing and the identification of sites to meet the spatial principles is not justified. The proposed distribution of housing and sites are not sustainable in line with the objectives of the NPPF and as a result the Plan is fundamentally unsound in this regard.