

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

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

November 2019
On behalf of Karbon Homes

Carter Jonas

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1.0 INTRODUCTION

- 1.01. This Hearing Statement is made for and on behalf of Karbon Homes (KH) and responds to selected questions set out within Matter 2: The Housing Strategy the spatial distribution of housing of the Inspector's Matters, Issues and Questions.
- 1.02. The Inspector's Issues and Questions are included in bold for ease of reference. Where a specific Question is not covered KH has no comment at this stage as part of this Statement of Case.
- 1.03. The following responses are pursuant to and should be read in conjunction with our comments upon the Proposed Modifications, dated June 2019. Carter Jonas on behalf of KH is scheduled to attend and participate in the examination hearing session for Matter 2: The Housing Strategy the spatial distribution of housing of the Inspector's Matters, Issues and Questions.
- 1.04. KH is promoting a 100% affordable housing scheme on land at Boroughbridge Road, (the site) and has progressed an Option Agreement with the owners of the land. The land is site reference 779 in the 2018 Strategic Housing Land Availability Assessment (SHLAA) and formerly ref. ST29 in the 2014 City of York Local Plan and associated Site Selection Paper Addendum (September 2014).

2.0 MATTERS 2 MIQS

The Housing Market Area (HMA): Spatial Distribution

2.01 We focus our responses on the spatial distribution only.

Question 2.8 The Plan's development strategy is set out in Policy SS1. This provides five spatial principles to guide the location of development through the plan. In broad terms, is this the most appropriate spatial strategy?

2.02 In very broad terms the spatial strategy identified within Policy SS1 and the five spatial principles set out within this policy provide a clear focus for the location of development across the City in line with the sustainability objectives of the NPPF (paragraphs 7 – 16). The policy does however lack detail in relation to the distribution of housing growth across the Plan period.

2.03 We do however have considerable concerns that the proposed Plan does not follow the spatial strategy set out within Policy SS1 due to the reliance on major regeneration sites and the identification of garden villages (or stand-alone settlements) such as ST7 - Land East of Metcalfe Lane, ST14 - Land West of Wigginton Road and ST15 – Land West of Elvington Lane as a preference over the release of more sustainable urban extension sites such as our clients site - land at Boroughbridge Road.

2.04 Due to flaws the Green Belt review identified within our representation to the Proposed Modifications, dated June 2019 and highlighted within our Matter 3 Hearing Statement, we consider that this strategy may not be the most appropriate. It should be reviewed once the Council has a clear understanding of current/future growth needs for the City of York and the capacity of the existing urban areas (suitable brownfield sites and underutilised land) to enable the amount of Green Belt land required for de-allocation (to facilitate sustainable growth) to be determined, along with the amount of safeguarded land required. At this point the Council will be in a position to determine the most appropriate spatial strategy based on a robust evidence base.

Question 2.9 Policy SS1 says that the location of development will be guided by the five spatial principles. However, the Plan strategy does not quantify the spatial distribution of new housing across the Plan area.

a) What is the overall distribution of new housing proposed through the Plan? Should it be clearer in this regard? Does the Key Diagram provide sufficient illustration of the broad distribution of new housing across the Plan Area?

2.05 Policy SS1 does not identify the overall spatial distribution of new housing proposed through the Plan and should be clearer in this regard. The Key Diagram identifies Strategic Sites only. These Strategic Sites comprise 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.

b) What level of new housing is directed towards the City Centre and other parts of the Plan Area?

2.06 The level of housing directed towards the City Centre and other parts of the Plan Area is not identified within Policy SS1. 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.

2.07 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.

c) How has this distribution been arrived at and what is the justification for it?

2.08 Paragraphs 3.4 – 3.12 of the Publication Draft refers 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 or robust justification for the proposed distribution that has been arrived at within the context of this information.

2.09 As mentioned above once the Council has a clear understanding of the current/future growth needs for the City of York and the capacity of the existing urban areas (suitable brownfield sites and underutilised land) to enable the amount of Green Belt land required for de-allocation (to facilitate sustainable growth) to be demined, along with the amount of safeguarded land required. At this point the Council will be in a position to determine the most appropriate spatial strategy based on a robust evidence base.

d) Is the distribution consistent with the overall approach set out in Policy SS1?

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 (or stand-alone settlements) as a preference over the release of more sustainable urban extension sites such as our client's site - land at Boroughbridge Road, is not a sustainable option and demonstrates the flaws within the Council's retrofitted approach to the location development through the plan.

e) Is the distribution of housing supported by the SA and will it lead to the most sustainable pattern of housing growth?

- 2.11 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). 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 identified.
- 2.12 It is also clear that there are flaws with the scoring of Sustainability Appraisal as there are various scores which underplay the significance of the effect of development of a number of the 'garden villages' (or stand-alone settlements) 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 objective. 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 I – 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.
- 2.13 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 identification of 'garden villages' (or stand-alone settlements) such as ST7, ST14 and ST15 as a preference over the release of more sustainable urban extensions to existing settlements such as our clients site - land at Boroughbridge Road is not a sustainable approach to future development. The Council even acknowledge in paragraph 7.1.9 of their Sustainability Appraisal that *"whilst there are no other single sites which have been identified or considered to be a viable or deliverable alternative to ST15 (within the context of the NPPF), a combination of other strategic sites could provide the growth equivalent to that proposed"*. Despite this acknowledgement there appears to be no evidence to demonstrate that the Council have considered an alternative combinations of sites that would be more sustainable.

f) Has the Green Belt and/or any other constraints influenced the distribution of housing and, if so, how?

- 2.14 Whilst the Council have undertaken a Green Belt review (Topic Paper 1: Approach to Defining York's Green Belt (May 2018), Addendum (May 2019) and Approach to the Green Belt Appraisal (2003)) it is based on evidence which is out of date, going back as far as 2003, preceding the 2012 NPPF. We consider that the Council has sought to retrofit the Green Belt Review to their chosen distribution of housing rather than identifying

the current/future growth needs for the City of York and working logical through a methodical approach to arrive at a sustainable and robust spatial strategy and distribution of development.

2.15 Our Matter 3 Hearing Statement sets out our detailed response to Green Belt matters.

2.16 As mentioned above paragraphs 3.4 – 3.12 of the Publication Draft refers 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. However there is no clear or robust justification for the proposed distribution that has been arrived at within the context of this evidence.

2.17 Given the technical information available it is concerning that site ST15 has been identified given its location within a Green Infrastructure Corridor and a third of the site is a Nature Conservation Site. We therefore question the weight that the Council has given to the technical information.

2.18 We also question the validity of the Sustainability Appraisal which we also assume the Council have used to influence the distribution of housing as there are sites such as ST7 which have been identified as having significant negative effects due to potential interruption to views towards the Minster.

Question 2.10 Overall, is the spatial distribution of housing justified and is the Plan sound in this regard?

2.19 Given the above comments it is considered that the spatial distribution of housing is not justified. It is not sustainable in line with the objectives of the NPPF and as a result the Plan is fundamentally unsound in this regard.