

# York Local Plan (YLP) – EiP Hearing Statement

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**Our ref** 50730/01/MHE/AWi  
**Date** 29 November 2019  
**To** Carole Crookes (York Local Plan Programme Officer)  
**From** Lichfields (on behalf of Bellway Homes)

## **Subject Matter 2: The Housing Strategy - Spatial Distribution of Housing**

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### **1.0 Introduction**

- 1.1 This Statement is submitted on behalf of Bellway Homes in respect of the spatial distribution element of the Inspectors' Matters, Issues and Questions. Bellway Homes have also submitted a separate hearing statement in respect of other questions set out in Matter 2, forming a joint statement with Taylor Wimpey UK Limited and Persimmon Homes.
- 1.2 This statement is to be read alongside the joint submission and in conjunction with previous submissions on the YLP on the Housing Strategy and other matters.
- 1.3 Set out below are responses to the Spatial Distribution questions of Matter 2.

### **2.0 The Housing Strategy: Spatial Distribution**

***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?***

***2.9 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?***

- 2.1 Throughout the Local Plan there is a lack of clarity on what has informed the distribution of housing and what the actual distribution is. The accompanying Key Diagram only identifies the proposed 'Strategic Sites' and the 'main built up areas' of the City, alongside the general extent of the proposed Green Belt. It is clear from the general extent of the proposed Green Belt that there is very limited opportunity to deliver housing on the edge of any urban area without building within the Green Belt. Similarly, the Key Diagram highlights the lack of any future opportunities for development beyond the plan period due to the tightly drawn Green Belt boundary.
- 2.2 Policy SS1 sets out that the location of development will be guided by five 'spatial principles'. It is not clear what has informed these spatial principles other than seeking to avoid the constraints of heritage assets and green corridors, prioritising the use of brownfield land, managing flood risk and promoting sustainable modes of transport.
- 2.3 What the spatial principles do not consider is the relative sustainability of individual settlements and areas, the level of available services and facilities and the infrastructure requirements that

might be available or required to deliver development in the proposed locations, including the benefits which can accrue through growth of individual settlements.

**b. What level of new housing is directed towards the city centre and other parts of the Plan Area?**

2.4 YCC to respond.

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

2.5 The distribution appears to have been devised with reference to the five ‘spatial principles’ although it is noted that the Sustainability Appraisal does not consider any reasonable alternatives, specifically an approach founded upon the principles of sustainable development.

2.6 Paragraph 151 of the Framework (2012) sets out that:

*“Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development.”*

2.7 Because Policy SS1 fails to consider the three dimensions of sustainable development set out within the Framework, or consider any alternative distribution which is clearly founded upon such a principle within the Sustainability Appraisal, it is not possible to conclude that the strategy is ‘justified’ and reasonable alternatives have not been assessed to demonstrate it is the ‘most appropriate’ strategy.

2.8 It is noted that the earlier, withdrawn, Core Strategy (2011) did include a settlement hierarchy based upon the relative sustainability of settlements and their capacity for growth. We have not reviewed all of the evidence that informed the previous settlement hierarchy but such an approach does provide a more understandable starting point to the location of development over the plan period.

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

2.9 The Spatial Distribution is overly reliant upon the development of new settlements in relatively isolated locations which do not have a baseline of services and facilities. There are more suitable sites, including Bellway’s site to the east of Strensell Road, Earswick which benefit from the variety of existing services and facilities in the area. Development will also support their continued sustainable growth.

2.10 As such it cannot be concluded that the distribution is consistent with the overall approach set out in Policy SS1.

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

2.11 The distribution is broadly supported by the SA, although it cannot be concluded it will lead to the most sustainable pattern of housing growth. Our view is that it will not lead to the most sustainable pattern of housing growth. The SA has not considered reasonable alternatives and does not seek to align with the presumption in favour of sustainable development. Consequently, the strategy is not justified in the context of the Framework.

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

2.12 The Local Plan and relevant evidence base does not provide clarity on whether or not the Green Belt has influenced the distribution of housing over the plan period. On the basis that there are more suitable locations for housing development (east of Strensell Road, Earswick), it seems likely that the Green Belt has been an influence although we await the Council's response on this question.

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

2.13 In consideration of the responses to the above questions, it cannot be concluded that the spatial distribution of housing in the plan is justified and the plan is not sound. The distribution as proposed is based solely on the five listed 'spatial principles' which do not align in all respects with the need to address the requirements of sustainable development.

2.14 The accompanying Sustainability Appraisal fails to appropriately consider alternatives and it cannot be considered that the strategy set out in Policy SS1 is the 'most appropriate' strategy.

2.15 It is our opinion that a strategy which is more aligned with the principles of sustainable development and focused on appropriate growth of existing urban areas, including Earswick, would constitute a more appropriate strategy to housing distribution over the plan period.