

# Examination of City of York Local Plan

## Phase 1 Hearings

### Statement by Julian Sturdy – MP for York Outer 2010-19 and Parliamentary candidate for York Outer at 2019 general election

#### Matter 1 – Legal requirements

It has been brought to my attention that the Plan may not be legally compliant as it goes against the Yorkshire and Humberside RSS revocation order and RSS saved policies, through redefining Green Belt Boundaries that are already detailed at and beyond the Outer Green Belt Boundary. This is evidenced by the treatment of the Wheldrake Green Belt boundary in the Topic Paper 1: Addendum document, in relation to ST33.

I feel consideration may have to be given as to whether this site needs to be revised or removed in order for the overall Plan to be sound.

#### **Matter 2 – The housing strategy: the objectively assessed need for housing, the housing requirement and the spatial distribution of housing**

##### The housing strategy: spatial distribution

On the basis of meetings and extensive correspondence with local residents, as detailed in earlier submissions during this overall process, I remain concerned about the level of housing proposed to the North of York. I believe there has to be rigorous scrutiny of whether the proposed spatial distribution is justified and sound, given the risk of placing significant new pressure on local infrastructure and services as a result of the cumulative impact of the substantial developments at ST8, ST9 and ST14, especially in view of the pressure local infrastructure is already under here.

Given this potential impact, I feel there are serious questions to ask about whether the level of development here is consistent with the approach of policy SS1; specifically does this spatial distribution properly reflect the 5 spatial principles set out in SS1. To avoid adverse impacts, infrastructure has to be improved to accommodate the volume of new residents as part of the development process, and the 5 principles are arguably not being adhered to if development proceeds before measures to mitigate this impact are well advanced.

The number of new dwellings could cast doubt on the ability for the Plan to meet the two spatial principles “*preventing unacceptable levels of congestion, pollution and/or air quality*” and “*ensuring accessibility to sustainable modes of transport and a range of services*” due to the impact on the A1237 Outer Ring Road. This is already over-capacity, with significant problems of congestion and air pollution from idling engines indicated by the fact that the average speed on this national speed limit road is under 20mph. Funding to dual the A1237

has now been secured, but this forthcoming improvement will arguably only mitigate the existing capacity issues, and does not include scope to address the further burden of increased traffic from this large number of additional dwellings near it. The scale of development to the North of York could blunt the positive impact of dualling the Ring Road here, contributing to the continuance of problems of congestion and pollution. The scale of development also risks exacerbating existing congestion problems on the Moor Lane and Usher Park access roads in the vicinity of Haxby and Wigginton.

The impact on local schools and health services also must be considered to avoid departing from the principle of ensuring accessibility of services. For instance, Haxby's local doctors' surgery already faces demand pressures, and this and other services across the North of the city will need additional resources to cope with additional population

The distribution of development North of York could also call into question whether the spatial principle "*ensuring flood risk is appropriately managed*" is being adhered to, unless appropriate mitigation measures are taken. For example, Haxby and Wigginton already faces considerable challenges related to surface water drainage, flooding, and raw sewage backing up through drains. Unless development is accompanied by improvements to drainage capacity and flood risk management, it is hard to see how the flood risk spatial principle is met.

Therefore, I remain concerned as to whether this distribution of housing will lead to the most sustainable pattern of housing growth North of the city, and request this is something that is very carefully examined.

### **Matter 3 – Green Belt: principles, the approach to defining the Green Belt boundaries, exceptional circumstances and the approach to identifying land to be 'released' from the Green Belt for development**

After receiving feedback from local residents, I have some concerns that the Plan's approach to the Green Belt may not meet the conditions of soundness set out in the NPPF.

It is my understanding that the definition of the Green Belt boundary in relation to ST33 (Station Yard, Wheldrake) in the Council's Topic Paper 1 on the Green Belt : Addendum [EX/CYC/18] is incorrect, and therefore unsound. This is because it shows land in between the Cranbrooks and Valley View (D80) as Green Belt, when in fact this land had already been removed from the Green Belt and allocated for housing according to Appendix J of the 2005 draft Local Plan on which [EX/CYC/18] is based.

I submit that the exceptional circumstances invoked for altering the Green Belt Boundary in relation to ST33 are weak and potentially irrelevant. The employment circumstance arguably doesn't exist as the lost of high-quality agricultural land will affect agricultural employment, there will most likely have to be restrictions on the type of employment allowed at the nearby industrial estate because of noise complaints from the new housing, and a local 15 year old business will also be lost as a result of development. The educational circumstance also is moot, as this only becomes operational if the development goes ahead. This leaves the

housing need exceptional circumstance, which is both not enough in itself, and could be met by the other Wheldrake site available which is not Green Belt.

Therefore, I feel consideration may have to be given as to whether this site needs to be revised or removed in order for the overall Plan to be sound.